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Comments: I respectfully request that the amendment that will be crafted in response to President Biden's directive to preserve old growth forests will protect both old growth and mature trees and forests from logging, with no exceptions. As written, the amendment allows logging to reduce fire risk. Old growth trees in intact forests are the most resistant to fire, and with regard to fire risk to human habitations, the most effective means is to harden the home and outbuildings as described in the Firewise Program. The Forest Service should be urging homeowners to follow this program instead of designing projects that include the logging of old and mature trees.

Oddly, the amendment also allows exceptions for old growth logging as long as the primary purpose behind it is not "economic." In all my years of perusing forest plans and project proposals, I have yet to see an EA or EIS in which the primary purpose for the logging was for economic reasons. Providing saw-logs to local mills is invariably in last place in the list of purposes and needs of a project, as if the millions of board feet that will come out of the forest are but a byproduct of purportedly necessary "restoration" work. I would much prefer that the Forest Service be honest about their motives. In any case, these exceptions should be eliminated from the final version of the amendment.

I need not enumerate all the benefits of saving old growth, as the Forest Service certainly is aware of these. But to mention a few: habitat for old growth-dependent species, enhanced biodiversity, water filtration and regulation of runoff, intact ground covers and understory vegetation, tourism and public enjoyment. The value of old and mature forests, and intact forests in general, to capturing and storing carbon that would otherwise worsen the climate crisis cannot be overestimated.

The fact that old growth stocks now comprise a small percentage of what they were in most forests, and are almost entirely absent in some, is the direct result of the Forest Service's timber-cutting program. In my own Yaak Valley, it is estimated that about 10% of the original old growth remains, in a forest that in some scientists' opinions may well have been composed of as much as 50% old growth. It is now the Forest Service's responsibility to do everything that can be done to preserve what old growth remains, and to nurture the mature component of our forests so that it becomes old growth in time.

Unfortunately, since the President's directive and throughout this lengthy process, from the rulemaking comment period to the development of the amendment, the Forest Service continues to propose and execute projects that involve cutting old and mature trees. This should stop immediately. I advocate a moratorium on cutting old growth until the amendment is finalized; and after that, a complete ban on cutting old and mature trees and forests.

I would also argue that Green et al, the 30-year-old standard for defining old growth, be updated using input from the public and from the greater scientific community. Put simply, the Forests Service has had, and continues to have, a voracious appetite for cutting trees, including a great deal of old growth. The President has ordered this to stop. But who decides what is old growth--which by order of the President is off limits to logging-- and what is not, and thereby may be logged? The Forest Service, of course. There is something rotten here. We need new definitions of old growth, relative to forest types, based on the generally agreed-upon best available science, plus input from the public.

Increasing the amount of old growth and mature forest in each Forest should be a major objective, and the amendment should include some means of monitoring that amount, as it changes over the years. I look forward to the day when promotions within the agency are dependent on progress toward increasing the percentage of old growth within the Forest (as well as other ecological objectives), instead of the number of board feet of timber

removed from the Forest.

Thank you for the opportunity to comment on this issue.