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Comments: Your management of old growth forests is biased toward commercial timber sales, and against Eastern forests.

The FS excludes forests in the entire eastern half of the United States from protection. Eastern deciduous forests from the Appalachians to the Ozarks play a crucial role in absorbing carbon from the atmosphere and storing it in the soil, and mature forests (which typically means "ready for harvest" to the agency) as well as old-growth must be protected under this important plan amendment. Instead, the FS proposes to continue their plans for logging and burning these forests, motivated by the money Congress gives them and conflating ecological health with the economic productivity of timber.

The FS fails to recognize that their own management is the root of the problem. Many of the national forests in the Eastern US were established in the early 1900s, and a major factor in establishing these forests was because timber and railroad companies had almost entirely clearcut the entire eastern half of the continent. A century of continued logging under the management of the US Forest Service has kept these forests in a degraded early-successional state due to repeated disturbances. Yet the FS insists that commercial logging is an ecological management tool, in an effort to justify continuing their mismanagement of our public forests. Mature forests must be allowed to grow to old growth status to meet the goals of Executive Order 14072.

The FS seeks to impose the same fire management techniques on eastern deciduous broadleaf forest ecosystems as those used in Western conifer forests, where fire plays a very different role. Our eastern forests are better suited for holding water and cooling the planet, and need to be allowed to do so.