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Comments: Mature and old growth forests are our legacy resource, providing irreplaceable services century after century. They cool and add humidity to our diverse climates, also helping to mitigate climate change by storing vast amounts of carbon and drawing down carbon from the atmosphere. In these ways, they help to minimize wildfire threats as well. They filter the water on which all life depends. They stabilize soils, preventing landslides and erosion. And they are host to a vast range of biological diversity from plants and animals to ferns, fungi, lichens, bacteria and habitat for diverse wildlife.

The US Forest Service has proposed a nationwide amendment to all 128 forest plans to restrict logging of old-growth forests, and begin guiding stewardship of future old-growth forests. However, the draft fails to prohibit logging of old growth; this is its most glaring deficiency, which must be corrected before all else.

USFS further enlarges this deficiency by using definitions to exclude forests that should qualify for protection and by allowing "de minimis" exemptions.

The agency's reliance on weasel words like "proactive (or adaptive) stewardship" and "climate adaptation" merely sugarcoat its intent to authorize commercial logging of old growth forests. Here in the real world, where these policies play out, this puts all life at risk for short term profit.

I urge USFS to make the following changes.

The final record of decision should adopt a modified Alternative 3:

End the cutting of old-growth trees in all national forests and all forest types and end the cutting of any trees in old-growth stands in moist forest types.

End any commercial exchange of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill. (Alternative 3 includes a "no commercial exchange" provision.)

Remove the exception that allows for "de minimis" logging of old-growth trees.

Eliminate the agency discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals.

Thank you for the opportunity to comment for the record.