

Data Submitted (UTC 11): 8/6/2024 10:06:44 PM

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Comments: I support the goals of the Amendments to Land Management Plans to Address Old Growth Forests Across the National Forest System, primarily "maintaining and developing old-growth forests" (page 7). I am, however, skeptical that "proactive stewardship" in the form of "vegetation management" that includes timber harvest and mechanical treatments will best achieve that goal. I think a better approach would be "to grow existing forests intact to their ecological potential," as recommended by William Moomaw (<https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2019.00027/full>). Kristina Berkowitz has demonstrated that restoration thinning and timber harvest increase carbon emissions relative to wildfire, suggesting that reducing fossil fuel emissions (including those generated by timber harvest and mechanical treatment) will do more for climate mitigation and reduction of wildfire potential than increasing extractive harvest to prevent fire emissions ([https://www.lib.uidaho.edu/digital/etd/items/bartowitz\\_idaho\\_0089e\\_12277.html](https://www.lib.uidaho.edu/digital/etd/items/bartowitz_idaho_0089e_12277.html)). Accordingly, I think the best course would be to minimize the use of vegetation management and require that each USFS old-growth forest stewardship project demonstrate carbon-neutral or carbon-negative impact. As a second choice, I prefer Alternative 3 (no commercial timber harvest) to Alternative 2 (proactive stewardship may include commercial timber harvest). One cannot ignore the fact that, historically, commercial logging has destroyed much old growth forest, making it a questionable tool of restoration. I believe that the conflict of interest between the commercial timber industry and the public interest is more acute and dangerous than the DEIS supposes (page 107). It is not certain that carbon will be stored in forest products, in part due to dependency on private industry (page 125). My views expressed above have been informed by the NGO, Forest Service Employees for Environmental Ethics. I was disappointed not to see that group referenced in the DEIS.