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Comments: Thank you for taking action to conserve our old-growth forests with the first ever nationwide forest plan amendment. This is a significant and much-needed step forward in efforts to conserve our national forests for future generations.

However, the current draft of the amendment is not strong enough to make a meaningful impact in conserving old-growth forests from current threats.

Most significantly, the current draft omitted Standard 1 that was included in the previous Notice of Intent-meaning management practices that degrade old-growth quality are not explicitly prohibited. As the Forest Service reduces the unnatural build-up of young trees and brush that is attributed to a century of fire suppression, it's imperative that the agency aim to create ecologically intact forests in the process and leave our oldest trees standing. This absence is a major flaw that could inadvertently promote ill-informed logging in old-growth that could destroy this unique and important ancient ecosystem. To achieve the dual goals of making our forests more resilient to wildfire while also restoring ecologically intact forests, Standard 1 MUST be restored in the final amendment.

Proactive management is often needed to restore ecological conditions, particularly dry, fire-prone forests where fuel loads are unnaturally high. However, in moist forest-types where fire is relatively infrequent, proactive forest management may not be the best option to restore old-growth conditions. Rather, a passive stewardship approach where moist forests naturally grow old and restore themselves is best. We urge you to explicitly articulate in the final plan components that passive stewardship is a management option alongside proactive management.

Additionally, I urge you to heed Tribal input and consider given feedback as you finalize and implement the amendment.

Finally, the amendment needs to establish a collaborative, equitable and science-based process to identify and recruit an adequate amount of potential future old-growth in every national forest. Conservation of the remaining old-growth estate is not enough-restorative stewardship of forests on their way of becoming old-growth is needed to ensure the wellbeing of future forest health and integrity in the face of climate change.

The current threats are too severe and the moment too urgent to continue with business as usual. Please take the strongest possible action to safeguard old-growth forests before it's too late.