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Comments: As a forest ecologist, advocate for the ecological and spiritual worth of old-growth forests, and frequent visitor to USFS lands, I recommend that the USFS adopt Alternative Three (with modifications detailed below) as the work on the National Old-Growth Amendment moves forward.

Old-growth forests on National Forest land are part of our American heritage and deserve rigorous protection from proposals that would place temporary, short-sighted economic gain over the preservation of biological diversity and ecological integrity.

I encourage the Forest Service to adopt a policy which will explicitly eliminate commercial logging in old-growth stands, strictly limit exceptions to non-commercial cutting, and expand our recruitment of future old-growth forests by protecting more mature forests now from logging. I am copying relevant text from the website of the Old-Growth Forest Network below:

Alternative 3 offers the strongest protections around old-growth forests, which are needed because of the enormous historic losses of these forests from logging over the past centuries and our dire need for their outsized climate and biodiversity benefits. We support the provision in this alternative that does not allow commercial exchange of trees. However, we recommend that the Forest Service adopt a modified Alternative 3 that:

Reduces opportunities for the cutting of old-growth trees and in particular, the cutting of any trees in old-growth stands that are in moist forest types.

Removes the exception for "de minimis" logging of old-growth trees, which means that some old-growth trees could still be cut for "research" or "local community purposes." This language is too vague and could leave too many old-growth trees vulnerable to being sent to the mill.

In addition to the above comments specific to Alternative 3, the entire amendment proposal should be improved to address these concerns:

There are no measurable goals for retaining old-growth or recruiting future old-growth from mature forests.

"Proactive Stewardship" could allow changes to a forest that would mean it no longer meets the definition of old-growth, then removing it from being protected from this very policy. Managing these forests in a way that removes their old-growth character goes against the very spirit of the policy. We recommend not allowing "proactive stewardship" to be applied in a way that reduces the amount of old-growth forest.

The Technical Guidance for Standardized Silvicultural Prescriptions for Managing of Old-Growth Forests suggests that they will need to be treated (e.g. mechanical thinning, harvest, prescribed fire) even if they already represent the desired condition. If it ain't broke, don't fix it!

Additionally, that guidance document provides a pathway for old-growth forest to be cleared entirely as a last resort to "move the stand toward desired conditions and/or improve ecological integrity." Ecological integrity is not defined in these documents and could be dangerously vague. Stand-replacing cuts (clear cuts) in old-growth forest does not contribute to its health, resilience, or conservation nor is it a climate-smart practice.