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Comments: The draft proposal released by the Forest Service outlines four potential pathways (referred to as Alternatives) that they may follow when putting together the final policy.

Alternative 1, in which no action is taken (no national-level old-growth policy implemented)

Alternative 2, in which old growth forests are proactively managed for climate adaptation, which may include logging for restoration purposes;

Alternative 3, in which all commercial timber harvest is restricted in old growth forests;

Alternative 4, which permits timber production and commercial logging in old growth forests without requiring it be for ecological or restoration purposes.

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. I support the provision in this alternative that does not allow commercial exchange of trees. However, I recommend that the Forest Service adopt a modified Alternative 3 that:

Reduces opportunities for the cutting of old-growth and mature 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. I recommend not allowing "proactive stewardship" to be applied in a way that reduces the amount of old-growth and mature forests.

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. This is crazy.

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.

Alternative 2 has been designated as the US Forest Service's preferred Alternative, but there are serious issues with how the policy allows "proactive stewardship" to result in old-growth forests being logged and allowing the commercial sale of these trees.

Alternatives 1 and 4 don't offer any added protections for old-growth forests and increase the threats to these forests.

I encourage you to emphasize the need for the policy to eliminate commercial logging in old-growth stands, highly limit exceptions to non-commercial cutting, and expand our recruitment of future old-growth forests by protecting mature forests now from logging.