

Data Submitted (UTC 11): 9/1/2024 1:21:45 AM

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Comments: The Forest Service should adopt a modified version of 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. USFS should remove 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.

There are serious issues with how the Alternative 2 allows "proactive stewardship" to result in old-growth forests being logged and allowing the commercial sale of these trees.