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First name: Troy

Last name: Mason

Organization:

Title:

Comments: I strongly support the vision of creating a resilient system of old-growth forests across the National Forest System, as outlined in the Draft National Old-Growth Amendment. However, I believe the current Draft Amendment falls short of achieving this vision. To truly protect and enhance old-growth forests, the Desired Conditions should explicitly include goals for increasing the amount of old-growth forests across the landscape. Currently, there is a significant deficit of old-growth forests, and any effective plan must address this shortfall by not only preserving existing old-growth but also by ensuring the expansion and restoration of these critical ecosystems.

One of the most critical oversights in the current Draft Amendment is the absence of an alternative that considers the conservation of mature forests or at least a portion of them. Mature forests serve as essential buffers and stepping stones to the development of future old-growth stands, and their conservation should be integral to any comprehensive strategy. I urge the Forest Service to incorporate an alternative in the Final Environmental Impact Statement that prioritizes the conservation of mature forests to support the long-term resilience of old-growth ecosystems.

Moreover, while proactive stewardship is vital for some forest types, it is inappropriate for others, particularly old-growth forests west of the Cascade Crest. These forests have developed their unique characteristics over centuries, and passive management-essentially leaving them undisturbed-should be the approach. The amendment's language must be revised to reflect this need for passive management in these regions. Additionally, the standards as currently written, particularly Standard 2c in the preferred alternative, allow for too many exceptions that could result in the significant loss of old-growth forests. While I recognize the importance of exceptions for tribal use, all other exceptions should be removed to ensure the protection of these irreplaceable ecosystems.

Regards,

Troy R. Mason