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Comments: Hello,

1. Alternative 3 is the best option (with amendments)

Out of the three alternatives, #3 offers the strongest protection for ancient forests. However, even under this option, logging, thinning, and prescribed burning could be done "non-commercially" under the guise of habitat restoration. The rule should have measurable, enforceable standards that end all old-growth logging, thinning, and burning on the national forests.

Old-growth, unlike every other forest type, cannot be created, managed, or "proactively restored" by human beings. It is the result of decades, often hundreds of years, of ecological self-management.

Ideally, both a moratorium on logging any forest landscapes over 80 years of age and setting science-based old-growth targets for each forest would ensure old-growth protection and recruitment nationwide.

In addition, lower federal timber production targets would lower the incentive for the agency to log old growth in the first place. We need to get the Forest Service out of the logging business.

The agency's preferred alternative (number 2) would reduce protections on the Nez Perce and Clearwater National Forests.

The Nez Perce and Clearwater National Forests (NPCNF) are governed by plans created in 1987. These plans have meaningful protections in place, including a minimum of 10% old-growth habitat forest-wide. These rules have allowed the public to hold this forest accountable, including when we blocked the Hungry Ridge and End of the World projects because they did not fully measure old growth impacts.

This amendment would supplant these existing rules, and would likely erase the measurable standards that exist. Ultimately, the forest service is abusing this process to decrease protections on the NPCNF, not increase, as was Biden's initial aim.

The USFS is seriously misleading the public on old-growth science

Independent science shows us that mature and old-growth forests are incredibly biodiverse, rare, and under direct threat from harvest and other "management tools". The draft environmental impact statement uses biased agency science to create a narrative that old-growth is under siege by fire, insects, and disease, and only large-scale timber management (logging) can save them.

This narrative is not based on current science. Fire can degrade old-growth habitats, but even large fires are beneficial to the ecosystem. Logging degrades old-growth while increasing the risk of fire, releasing tons of planet-heating carbon, reducing biodiversity, polluting streams, and compressing soils.

The "cure" of logging is much worse than the "disease" of a wild forest. If your doctor recommended an amputation to prevent sunburn, would you go through with it?

The presented range of alternatives is very biased toward logging.

All options, as written, allow for logging in old-growth. That should not be the case. Logging for "noncommercial purposes" is still logging and degrades mature and old-growth forests. Refusing to even entertain a strong alternative shows a serious lack of analysis on the part of the USFS.

What would be the impacts of protecting 100% of old-growth AND selecting certain over-logged areas to be left alone for 200 years? We don't know, because the agency hasn't looked into it.

This is a moment for bold, visionary policy, not veiled gifts to the timber industry.

In short, amid the biodiversity and climate crises, all forests capable of providing water, habitat, and carbon storage should be protected forever.