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Comments: Comment on: "Amendments to Land Management Plans to Address Old-Growth Forests Across the

National Forest System Draft Environmental Impact Statement" (2024 DEIS)

- 1. Thinning or logging should not be used in Old Growth forests as they do not protect the forest. See below.
- 2. Thinning (especially) and logging reduce carbon sequestration and utilization of the biomass is not carbon neutral.
- 3. Please stick to prescribed burns for fire management in old growth.

This quotation from the article (Bartowitz, Kristina J., Eric S. Walsh, Jeffrey E. Stenzel, Crystal A. Kolden, and Tara W. Hudiburg. "Forest carbon emission sources are not equal: Putting fire, harvest, and fossil fuel emissions in context." Frontiers in Forests and Global Change 5 (2022): 867112.) provides references for these positions:

While prescribed fire has been shown to decrease fire risk (Kolden, 2019) and increase carbon storage (Wiedinmyer and Hurteau, 2010), removal of biomass through large-diameter tree thinning or logging produces mixed outcomes for fire risk mitigation and forest resilience (Sohn et al., 2016) and reduces forest carbon storage and sequestration for decades to centuries (Campbell et al., 2012; Bartowitz et al., 2019; Stenzel et al., 2021). The misconception that trees need to be saved from wildfire through harvest (Zinke, 2018; Infrastructure Investment and Jobs Act, 2021; Table 2) may lead to unintended consequences through increased logging. These consequences include increased fire risk, a decreased forest carbon sink, decreased forest resiliency, and loss of the forest as a natural climate solution (Hudiburg et al., 2013; Law et al., 2018; Zald and Dunn, 2018; Stephens et al., 2020).