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Organization:

Title:

Comments: To whom it may concern,

I'm writing in protest of the new Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356.

My concerns are many - first and foremost are the discrepancies between the BLM and Federal government's definition of "old growth" and the count/size of land mass the old growth stands represent with that of other scientists and their definitions and measurements.

According to an article in SCIENCE (<https://www.science.org/content/article/how-much-u-s-forest-old-growth-it-depends-who-you-ask>) the size of the old growth forest to be managed and the specific trees defined as old growth are vastly different from the numbers estimated by scientists outside these agencies. This lack of a shared definition of what constitutes old growth and the discrepancy in size (apparently vastly underestimated by the government) means that it will be far too easy to cut even more old growth stands.

It appears that the accuracy around what is to be managed depends upon 1) the financial benefit that logging provides and 2) the oversight of the state in which these stands reside. The underestimating of the resource, the motivation of the individual state involved and its economic goals, combined with a lack of oversight make for inconsistent application of the ruling and enable massive clearcutting. This obfuscation of the facts looks to the public intentional.

The removal of these stands of trees doesn't just disrupt the carbon sequestration they provide but it alters the landscape they inhabit increasing the likelihood of flooding and landslides, destroys essential habitat for other species, and reduces the benefits these trees provide to the watershed (uptake of toxins, clearer and cooler water essential for fish to thrive). Their destruction also removes valuable genetic material that has enabled these trees to survive centuries and which can no longer be distributed to subsequent generations of trees. Logging/Clearcutting may provide short-term financial gain, but it also leads to monocultures at increased risk of massive infestation and disease. How is any of this "a public good?"

If I can find a positive here, it would be that there appears at least an intention to finally listen to the tribes for their innate knowledge - knowledge that had successfully allowed these incredible species to survive unfettered for centuries until we came along.

Thank you for your consideration.