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Comments: In your own words, the goal of this amendment is to "foster the long-term resilience of old-growth forests and their contributions to ecological integrity across the National Forest System". In my opinion, and in the opinion of many of those who actually spend a significant amount of time in federal forested areas, the biggest threat to mature and old-growth forests currently is the hands-off management approach that the U.S. Forest Service has taken in recent years.

My family has run cattle on the Giant Sequoia National Monument since 1895, predating the Forest Service. We have watched the forest respond to variable management approaches for over 100 years. Most notable is the rapid decline in forest health after designation of the monument in April of 2000. This magnificent landscape was decimated in the 2021 Windy Fire. Due to an unnecessary surplus of fuel, what started as a normal lightning strike grew to a raging inferno that could only be put out by fall rains and old burn scars. Over 1,000 giant sequoias were killed in this fire.

This fire is the perfect case study with which to make more informed decisions and better policy because it took place in an area with a high population of very old trees that have been "protected" by some of the most stringent policies federal forest management has to offer. As its name implies, the Giant Sequoia National Monument was once home to nearly half of the world's giant sequoias, a tree which would surely be included in anyone's definition of "old growth". Due to this area's unique abundance of ancient giants, then-president Bill Clinton decided in 1999 to give it a special designation in hopes to "counteract the effects of a century of fire suppression and logging". What many do not realize, or simply fail to acknowledge, is that at the time Clinton signed Proclamation 7295 and established the monument, these giant sequoias were already protected. Therefore, the monument designation did nothing to prevent logging of giant sequoias. It simply placed more stringent rules on all logging in the vicinity of the giant sequoias, which led to rapid fuel accumulation. As a result, the tree that has long been regarded as fire-resistant has succumbed to fire, and it is our own fault.

To me, the path forward is not simple. With decades of mismanagement, we have dug ourselves a grave that cannot be filled with a generalized, one-size-fits-all amendment. True forestry is not simple. It is a science and a very important profession. Any honest forester will tell you that good management must vary by ecosystem and location. Further, the term "old growth" is far too nebulous to be the pillar for future management efforts. What many would consider "old growth" in California, the giant sequoia, is far older than what might be considered "old growth" in Idaho, where the trees as a whole are much younger and have a very different species composition. The Forest Service will be hard-pressed to develop a formal definition of "old growth" that applies to all tree species and all Forest Service regions, which makes the goal of this amendment nearly unattainable.

Increasing restrictions and red tape will do nothing to improve our forest health. We would be wise to consult professional foresters rather than radical environmentalists on our quest toward more responsible management and a healthier forest. We have let the environmentalists make the rules for years, and look where it has gotten us. Restricting logging, as they suggest, is the last thing we should be considering. Fuel accumulation is a far

greater danger to old trees than the presence of logging equipment and industry. We know this because the forests of the 1900s, when logging was embraced, were much healthier than the forests of today. I say consult the professional foresters, and I'm sure they will agree.