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Comments: Old growth is very important to me and should be preserved for both ecological and spiritual reasons. Please do not make a decision on how to manage old growth forests without having first walked through one. During your walk you will notice, as I noticed during a special walk through an old growth forest in Eastern Oregon at the base of a tiny crater lake in the volcanic region, the special silence and stillness and energy of the ancient trees that can be found nowhere else other than possibly a sacred ancient religious structure. Other types of forests do not provide this majestic experience. In addition, this type of forest which takes more than 80 years to grow provides many other necessary aspects of the greater ecosystem that less mature forests with smaller trees can not provide. For example:

Mature and old-growth forests ensure carbon storage and sequestration to mitigate climate-change and related impacts like the dry conditions and high winds that lead to damaging wildfires. Large trees store and sequester more carbon than small trees and saplings.

Mycorrhizal fungi and other essential ecosystem processes occur in the soil around old-growth trees. Ground disturbance will impair vital functions of these organisms and processes and The DEIS ignores this fact.

Bird and animal species like black-backed and three-toed woodpeckers thrive in mature snag forests. Salvage logging in old-growth and mature forests removes their habitat.

Old, large trees are the most fire resistant trees in the ecosystem. Protecting old growth therefore supports the Department of Agriculture's Wildfire Crisis Strategy.

Mature and old-growth forests enhance and preserve habitat which increases necessary biodiversity.

For the above reasons, I ask that the Forest Service please consider doing the following as it evaluates its old growth policy:

Reinstate Standard 1 in the final version of NOGA. Standard 1 from the Notice of Intent mandated that agency activities "must not degrade or impair" old-growth forests. Standard 1 was removed from the Draft Environmental Impact Statement (DEIS). Without a strong standard to protect the integrity of old-growth forests, NOGA offers little protections for old-growth forests and the wildlife that rely on them to survive.

Not removed Old-growth areas from old-growth status for any reason. The DEIS does not require managers to preserve old-growth conditions. Management activities are allowed to destroy old-growth forests when "managed for the purpose of proactive stewardship." "Proactive stewardship" includes a laundry list of loopholes allowing agencies to degrade and impair old-growth forests to the point of losing old-growth status. Agencies must preserve and increase old growth not destroy it.

Do not permit commercial logging, burning, or ground disturbance in old-growth forests. Eliminate all exceptions that allow commercial logging of old-growth forests.

Do not count Old-growth trees towards politically derived timber output requirements for public lands. Decades of political pressure to meet unreasonable and unsustainable timber mandates forces agencies to log old-growth and mature trees that should be left standing.

Do include strong protections for mature forests. Mature trees are the future of old-growth forests. They must be protected to recruit future old growth. The Executive Order calls for protection of BOTH mature and old-growth forests, but mature forests are not protected or even mentioned in the current draft Environmental Impact Statement.

Have the Amendment consider commercial logging to be the number one threat to old-growth forests. A comprehensive study demonstrates that far more tree mortality is caused by logging than by wildfires and insects. Logging is the one mortality factor that is completely controllable.

Provide clear and measurable criteria for old growth that agencies and the public can use to identify old growth.

Considered Old-growth forests as essential to carbon storage and set them aside as climate refugia. NEPA analysis does not adequately account for or compare carbon emissions due to logging and roadbuilding versus wildfire. A full accounting of carbon sequestration loss and carbon emissions from logging activities using the best available science must be analyzed and disclosed to the public.

Note that the Forest Service's current old-growth and mature forest inventory is not accurate and does not rely on the best available science. The analysis ignores a recent study using more precise information to identify old-growth and mature forests across the lower 48.