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Comments: Commercial Logging is an Inappropriate Management Goal, not a Legitimate Tool for Protecting Old-Growth And Mature Forests

The USFS claims that commercial logging is an ecological management tool in old-growth forests. The absurdity of this claim is difficult to overstate. There is absolutely no ecological equivalent to a timber sale. Even in the most catastrophic windstorm or wildfire, there is no natural set of circumstances whereby the big sawlogs are removed from the system entirely.

Today's logging on our national forests is motivated by the proceeds from sale of the timber from our public forests, with an attempt to cloak their intent behind a veil of ecological justifications. The agency is allowed to keep the money from the commercial sale of timber, yet nationwide, the US Forest Service loses an average of \$44 million per year on their commercial timber sale program. This makes commercial logging a cumbersome management tool indeed.

The agency claims to "teach the forests resilience" but one cannot train an ecosystem like a dog or a horse. Old-growth forests are naturally resilient; they have to be, in order to survive the myriad pressures and changes that an ecosystem faces over time.

Scientists continue to discover ways that forests, especially forests in the eastern United States, play an important role in mitigating not only the near-term effects of climate change, but also provide a crucial part of the solution to drawing down excess carbon from the atmosphere. An important study published February 2024 shows that a century of forest restoration, much of which can be credited to the Weeks Act of 1911 which created most of the National Forests in the eastern US, is responsible for an "anomalous warming hole" due to the power of forests, young and old, to cool the planet. In order to keep this carbon safely stored out of harm's way, and to maximize CO2 sequestration capacity, those forests must be allowed to grow naturally, recognizing that natural disturbance is part of the process of natural regeneration.

There is a growing effort to develop ways to calculate the value of a given acre of forest, in terms of its ability to absorb carbon from the atmosphere. The value of that hypothetical acre is further enhanced by the discovery that microbes on the bark of trees absorb methane, a greenhouse gas far more potent and problematic than carbon dioxide. This significantly changes those calculations. Frequent, low-intensity fires would scorch this bark habitat, affecting microbe populations and negatively affecting this methane-absorbing capacity.

Instead, the USFS imposes a slash-and-burn prescription upon forests that are trying to grow as cool and shady

as possible, nature's way of conserving the water that all life depends upon. USFS prescriptions to create open, "oak-dominated" canopy habitat in a response to the "threat" of mesophication - the very cooling mechanism we need to address the climate crisis - are the very opposite of how we need to be managing the 31 national forests included in Regions 8 and 9, and other areas where deciduous broadleaf forest habitat is found. The industrial-scale approach to using fire as a management tool encompasses thousands of acres at a time, at a rate of frequency that is simply not found in nature. Instead of reducing the risk of fire, their use of fire as a management tool ensures that fires will be more frequent in these eastern forests, the natural and necessary interconnected result of forcibly adapting the forest to accommodate fire. In the densely populated eastern US, this is as disastrous as it is foolish and prideful.

I am writing on my own behalf to urge the USFS to stop commercial logging and burning on our National Forests. The climate and our survival are literally at stake.