

Data Submitted (UTC 11): 9/18/2024 4:00:00 AM

First name: Byron Drew

Last name: Foley

Organization:

Title:

Comments: Dear USDA Forest Service,

Summary: Please stop cutting ALL old-growth trees in the Daniel Boone National Forest and in all other national forests. How did forests "manage" themselves before 1492? They did so in a natural way, or maybe they were managed by indigenous people. The bottom line is that North American forests required almost no "management" prior to the arrival of colonists. They require "management" only because western civilization arrived. So, let's "give nature a chance" to re-establish the forests that our civilization has destroyed. Let's especially focus on not cutting any old-growth trees because of the many benefits and protections they provide to humans and all other life.

The NOGA draft environmental impact statement sets important and necessary goals for protecting the Nation's climate-critical forests. As proposed, however, it would still allow logging of old-growth, and it does nothing to protect mature forests and trees - the old-growth of the future - from logging.

To successfully achieve protection for old-growth forests, the final NOGA must:

1. Eliminate exceptions and end all logging of old-growth trees (except in rare cases for public safety and indigenous cultural uses), including in the Tongass National Forest.
2. End logging in moist and infrequent fire old-growth stands. Younger trees in old-growth stands that burn on longer fire cycles do not need to be removed for ecosystem restoration or wildfire mitigation.
3. Protect old-growth trees in cases when logging may be necessary in frequent fire forests. Young trees in fire suppressed old-growth stands may need to be removed, but old-growth trees should be left standing.
4. Prohibit sending old-growth trees to the timber mills. The economic incentive for logging old-growth must be removed. If the logged tree cannot be sold or exchanged, it will likely prevent all but truly rare removals of old-growth trees.

5. Set the stage for durable protections for mature trees and stands. This is paramount to the future of old-growth. If we do not also protect mature trees, we will fail to recover old-growth forests across the country. Mature trees will grow into old trees over the next several decades and as many of them as possible must remain standing.

6. Be consistent with the need to address wildfire. Protecting older trees and forests can increase forest resilience to wildfires and can also combat climate-change related impacts such as flooding and drought. Protecting our oldest trees supports the Department of Agriculture's Wildfire Crisis Strategy.

Thank you for all the hard and complex work you do to protect our forests. Hopefully, protecting old-growth trees will become your highest priority.