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Comments: I greatly appreciate the opportunity to comment on the June 2024 Draft Environmental Impact Statement (DEIS) concerning the Amendments to Land Management Plans for Old-Growth Forests across the National Forest System.

As you know, the DEIS aims to support President Biden's 2022 Earth Day executive order to conserve and restore America's mature and old-growth forests. This initiative is crucial because mature and old-growth forests play a key role in providing clean water, absorbing carbon, and supporting wildlife. The federal government manages around 32 million acres of old-growth (18% of federally managed forest land) and 80 million acres of mature forests (45% of federally managed land), totaling 112 million acres.

Regrettably, the DEIS does not fully align with the Biden administration's objectives for two main reasons.

First, it focuses solely on old-growth forest management and neglects mature forests, failing to create a national framework for managing forests that are likely to become future old-growth. This oversight contradicts the administration's directive and undermines the long-term preservation of old-growth forests. Protecting and preserving mature forests is essential for mitigating climate change impacts, as older trees are more fire-resistant. Strengthening protections for these trees will not hinder the U.S. Forest Service's wildfire management efforts.

Second, the DEIS does not impose a ban on logging old-growth forests, instead offering numerous loopholes for timber harvesting. This approach contradicts the Biden administration's mandate and jeopardizes old-growth forests. The DEIS should be revised to restrict logging in old-growth areas, permitting it only when absolutely necessary for forest protection or human health.

I am particularly interested in the Old-Growth Forest Amendments DEIS because the Superior National Forest (SNF) includes approximately 100,000 acres of old-growth and 460,000 acres of mature forest, as outlined in the most recent Land and Resource Management Plan. The 2004 plan notes that many stands meeting old-growth criteria could still be subject to timber management, risking the reduction of these valuable areas.

If the DEIS does not expand to protect mature forests and strengthen prohibitions on harvesting, the U.S. Forest Service will fail to meet the Biden administration's goals, jeopardizing both existing old-growth and future generations of these vital forests.

Kind regards,

James Henderson