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Organization:

Title:

Comments: Greetings and happy reading!

Thank you for the opportunity to comment. Fortunately you are required to do so, even though it causes you a lot more work on the tax payer dollar. And you will get a better result by taking in comments. Yes you are public servants and I am grateful. The executive order you are addressing recognizes the critical importance of America's mature and old growth forests to combat the climate and biodiversity crises, and directs federal agencies to conserve remaining (no thanks to you), mature and old growth forests on federal lands. It speaks of increasing the amount of old growth

Your draft amendment does not address this adequately -- not even a mention of mature forest (future old growth), and full of loopholes leaving things to your discretion, such as the broad generalization of "forest health", "wildlife conservation", "wildfire mitigation"..... all of which need more specific definitions of what they mean and guidelines of how they can be applied.

Let me start with the know benefits of old growth and mature forest:

Public health: clean water, clean air, and flood and erosion reduction

Fighting climate change: one of the most affordable and effective tools for doing this. Old growth usually possess features that are more resistant to fire -- big old trees with thicker bark and often self pruning of lower branches.

Biodiversity: generally more biodiverse and refuges for many at risk species. Biodiversity should be one of the measures of designating old growth.

I am not a scientist but my comments should be taken into consideration as a concerned citizen!

These above three general benefits are generalizations having plenty of scientific evidence/documentation, which other comments will submit in reams.

Specific things I would like to see in the amendment:

1) Stop cutting old growth trees in any forest type! Only a demonstrated imminent risk to public safety or a requirement of Native American traditional and customary use, or as required by treaty/statute.

2) No commercial logging of any form in old growth and greatly reduced logging in mature forests.

3) Once an area is identified as old growth leave it alone even if your definition changes.

4) As per executive order set guidelines that require you to protect large areas of mature trees that will be allowed to become old growth.

5) Set aside more areas of old growth and mature forest to be considered by Congress for wilderness designation. In my part of the country, GMNF, much of the wilderness designation is too high or steep to cut. Let's expand wilderness areas.

6) In consideration of climate change, require yourselves to account for all carbon emissions caused by your logging projects and provide quantified estimates for all carbon pollution resulting from a project. Also provide information to understand how long it will take the "treated" project area to provide carbon sequestration services as existed prior to the project initiation in the project area.

7) Stop prioritizing hunted species that like early succession forest over old growth and mature forest. Non hunted threatened or endangered species must have the highest priority, which is not always the case, albeit is is mandated that it should be. Sure some of the endangered/threatened species may also like early successional forest (of which there is plenty in the NE and probably elsewhere) on private land. Yes, we/you could consider the bigger picture outside public forest, and even inside public forest, as typically only the project area is addressed.

8) No more new roads in any old growth stand, or in large roadless areas of mature forest.

You already know the consequences of new roads, and except for getting timber out they are overridingly bad.

9) Recreation! I am an avid recreationist/sportsman on public land! Nevertheless I do not want/need any new trails of any kind through the interior of existing old growth. "Interior" is subjective and could be better defined. Trails on the periphery are enough for people to experience the majesty of big old trees -- good for the mind and soul.

10) We don't seem to be able to stop the deforestation of the Amazon basin. We can stop deforestation on public lands in the US by not logging old growth in the National Forests -- i.e. lead by example.

Thank you,

Sincerely submitted,

Alan Coulter