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Comments: Thank you for inviting comments on the June 2024 Draft Environmental Impact Statement ("DEIS") regarding Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System ("Old-Growth Forest Amendments").

As you are aware, the Old-Growth Forest Amendments DEIS was intended to conserve and restore America's mature and old-growth forests. Mature and old-growth forests are vital to providing clean water, absorbing carbon pollution, and supplying habitat for wildlife. This initiative is important because the federal government manages approximately 32 million acres of old-growth (18% of federally managed forest land) and 80 million acres of mature forests (45% of federally managed forest land), for a total of 112 million acres on federal land.

First, the Old-Growth Forest Amendments DEIS limits itself to the management of old-growth forests, and not mature forests, thereby failing to provide a national structure for the management of forests that have a strong likelihood of becoming the next generation of old-growth forests. It is imperative that we emphasize the protection and preservation of tomorrow's old-growth forests-mature forests-as a tool to protect against ongoing and future impacts from climate change. Moreover, older trees are more fire resistant and stronger protections for mature trees would not materially impact the U.S. Forest Service's ability to address and plan for wildfire risk.

Please attend to the loopholes included in the 2024 DEIS that will invite "stretching" the opportunities for logging.

I have an interest in the Old-Growth Forest Amendments DEIS given that the SNF has approximately 100,000 acres of old-growth forest and 460,000 acres of mature forest, according to its most recent Land and Resource Management Plan. (See 2004 Superior National Forest Land and Resource Management Plan at Appendix A-23). Sadly, as noted in that 2004 Forest Management Plan, "[m]any of the stands meeting existing old growth criteria, and others that have high potential for meeting these criteria in the not too distant future, would be available for timber management activities. Therefore, the pool of stands with old growth potential could be reduced, perhaps substantially." Id.

Unless the Old-Growth Forest Amendments DEIS is broadened to include the protection of mature forests and strengthened to categorically prohibit the harvesting of such aforementioned forests except in the most necessary instances, the U.S. Forest Service will fail the American people by slowly eroding existing old-growth forests and not protecting the next generations' old-growth forests.