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Comments: Out of the three alternatives, #3 offers the strongest protection for ancient forests. However, even under this option, logging, thinning and prescribed burning could be done "non-commercially" under the guise of habitat restoration. The rule should have measurable, enforceable standards that end all old-growth logging, thinning, and burning on the national forests.

Old-growth, unlike every other forest type, cannot be created, managed, or "proactively restored" by human beings. It is the result of decades, often hundreds of years, of ecological self-management. You can read policy director Jeff Juel's incredibly researched paper on old-growth [here](#).

Ideally, both a moratorium on logging any forest landscapes over 80 years of age and setting science-based old-growth targets for each forest would ensure old-growth protection and recruitment nation-wide.

In addition, lower federal timber production targets would lower the incentive for the agency to log old-growth in the first place. We need to get the Forest Service out of the logging business.

The agency's preferred alternative (number 2) would actually reduce protections on the Nez Perce and Clearwater National Forests.

The USFS is seriously misleading the public on old-growth science and the presented range of alternatives is very biased toward logging.

Thank you.