

Data Submitted (UTC 11): 9/19/2024 4:00:00 AM

First name: Dee

Last name: Tvedt

Organization:

Title:

Comments: In regards to the plan for old growth forest conditions: #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.

Ideally, you would implement 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. The Forest Service needs to get out of the logging business and back into the forest-saving business.