

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

First name: Dawn

Last name: Murray

Organization:

Title:

Comments: Dear Director Linda Walker,

I am an Environmental Studies Professor at Antioch University in California. America's old-growth forests are critical to the health and vitality of our public lands and cherished as recreation destinations by our community. The National Old-Growth Amendment can provide a strong foundation to promote the stewardship of U.S. forests and enhance the quality of our old-growth trees in particular. While the amendment represents a step in the right direction, it will not adequately protect our old-growth forests.

We appreciate the Forest Service's prioritization of combating wildfires and improving resilience through proactive forest management. However, the amendment currently allows forest managers to do the bare minimum to preserve old-growth forests and creates loopholes that could lead to the continued or even increased logging of old-growth trees. We need more robust protections and creative incentives to address these threats. Further, we ask that the amendment require the implementation of robust monitoring systems to track the health and extent of old-growth forests.

Unfortunately, the amendment lacks a clear framework for protecting mature trees, which are necessary for the recruitment of future old-growth forests. Harvesting mature trees without restriction would seriously diminish our ability to preserve old-growth forests and their benefits for future generations.

Finally, the amendment applies a one-size-fits-all approach that does not accommodate the diversity of our National Forests. We urge the Forest Service to implement regional strategies that allow a tailored approach to forest management and incorporate the unique features of forests across the country.

Please take action to strengthen the National Old-Growth Amendment so that future generations are able to enjoy the countless benefits that these irreplaceable forests provide.

Sincerely,

Dawn Murray, PhD