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Comments: I am writing as a concerned citizen who loves our old-growth forests and wants to do everything we can to protect them. If we do not, our land will look like most of Europe, which clear cut its beautiful forests years ago and now has little old-growth left.

In addition to their beauty and their importance as part of the ecosystem in our Wilderness, our mature and old-growth forests play an important part in mitigating the effects of climate change.

Executive Order 14072 noted that MOG forests "play an irreplaceable role in reaching net-zero greenhouse gas emissions" and promised to "retain and enhance carbon storage" in MOG forests. The draft Environmental Impact Statement (EIS) fails to comply with these promises and does not provide an adequate range of alternatives.

The EIS fails to offer protection of mature forests, which comprise most of the carbon-rich forests in the Western U.S. The proposed alternatives would allow the sale and removal of mature and old-growth trees, such that not a single acre of these biodiverse, carbon-rich forests would be protected from logging. Moreover, the EIS ignores research findings that show that thinning emits about three times more CO₂ per acre than wildfire alone does for equal energy produced. Also, thinning kills significantly more trees than it prevents from being killed. The Forest Service's own research shows that increased logging will undermine atmospheric carbon draw-down substantially and will compromise the goal of reaching net-zero emissions. Moreover, that same research shows that protecting forests from logging will reduce atmospheric carbon by 84 million tons of CO₂ annually.

The Old-Growth Amendment needs to recognize the critical biogeographic differences among the nation's forests, particularly the ecological differences between moist and dry forests. For example, the draft EIS focuses on "proactive stewardship" to speed the development of old-growth characteristics. This strategy is useful only for tree plantations and should not be applied to moist mature and old-growth forests, because these older forests are already well on their way toward (or have already become) old-growth and the stress of intervention will delay or harm natural forest development. Proactive stewardship in mature and old-growth dry forests could include invasive plant removal, thinning small trees, or limbing trees to reduce the risk of canopy fires. Proactive stewardship in mature and old-growth moist forests should be strictly limited to invasive plant removal, without thinning or limbing.

Increased logging will disproportionately impact and unjustly impact many communities that will suffer severe health impacts. These communities are already subject to environmental injustices and do not deserve to suffer further negative effects..

In summary, none of the proposed alternatives faithfully implement President Biden's April 2022 Executive Order on mature and old-growth forests. That order promised to "conserve America's mature and old-growth forests on Federal lands." Accordingly, we hope you will take this opportunity to reconsider the proposed alternatives and instead, implement plans that will fully protect mature and old-growth forests from logging.