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

First name: A

Last name: Simonson

Organization:

Title:

Comments: Dear Chief Moore,

The National Old-Growth Amendment Draft Environmental Impact Statement (EIS) is a positive move forward in recognizing the values of mature and old-growth forests. However, the draft lacks the means-- the intent of providing the teeth--of real, on-the-ground, region by region, forest district-by-district protection of our most mature trees and forests.

The dangerous precedent of continued logging of our nation's remaining older forests- has already been set in motion by still allowing harvest of old growth trees. In the Western U.S. these old growth harvests occur by timber sales using the Forest Service's own prescribed "silvicultural or forest treatments." Logging of old growth and very mature trees keeps happening under various types of timber sale units.

These forest lands with mature trees often provide key habitat corridors, or were supposed to be previously set aside for their roadless area, wildlife, botanical and riparian habitats, or clean water and fish populations. Some were conserved as Late Successional Reserves (LSRs) that include some of the nation's last older forests. Some were supposed to be conserved Bureau of Land Management (BLM) forests. These mature forest lands-- some which had already been reduced to literal islands of biodiversity, surrounded by past immense clearcuts-- need immediate protection---not harvesting for timber production, even under the guise of fire resilience.

Here in the U.S., we already have plenty of land devoted to timber production; let's not mess with the small amount of remaining old growth template. We really shot ourselves in the foot during the rampant unsustainable levels of timber harvest in the past decades, shipping every fifth old growth log overseas. Short-sighted and gross overharvest, supplying an international market out of our nation's beautiful forests and short-term profit has most certainly forfeited our future sustainable supply and local jobs. Now we are in a bind, especially as we learn more about the tremendous value of forests in fighting climate change!

Decades of scientific research and data have shown the multitude of other, long-term values of why we shouldn't be harvesting our nation's oldest forests and individual trees.

Protection of older mature trees and forests is not only about conserving habitat, species diversity, and watersheds. It is way beyond that--in terms of absorbing and storing carbon, and helping against climate change; we must look ahead and stop cutting all old growth trees.

The Final EIS also needs to provide stronger protection for mature trees in all riparian areas. Water quality and the role of mature forests are intertwined, and our future depends on protections put in place now.

The Final EIS of the National Old-Growth Amendment should more clearly describe the actual protections, and mandate all remaining old growth TREES not be harvested, in any unit-- of any timber sale-- in the United States of America.