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Comments: Please accept the following comments regarding the draft EIS on the FS old growth analysis. I am very supportive of the program initiated by the Biden Executive Order 14072, Apr. 22, 2022. My comments on the draft FS EIS following an initial inventory of "old growth forests" will focus on the following points:

(1) Terminology: In order to dispel the general perception by the public that "old growth" forests are simply old trees, I believe the term "primary" forests as used by the UN Food and Agricultural Organization (FAO) would be more applicable. "Primary" forests are "naturally regenerating forests of native species where there are no clearly visible indications of human activities and ecological processes are not significantly disturbed." "Secondary" forests, i.e. forests with structurally complex vegetation that have been stable for long periods of time resulting in minimal disturbance of sensitive and endemic species, could replace or supplement the term "mature" forests.

(2) Inventory of primary and secondary forests: The initial nation-wide inventory of these forests needs to be refined to illustrate more site-specific forest details of the kind and actual geographic extent of the forests based on type of vegetation and using additional field and aerial data. These more detailed inventories must be completed prior to any "management" practices established by the Forest Service.

(3) Forest Management: "Climate smart management" should be utilized in primary and secondary forests rather than "pro-active" management. "Climate smart" management recognizes the re-generating and sustaining qualities of primary and secondary forests with "complex biodiversity" which includes: (a) inter-connected forest floor plant communities, (b) carbon producing ecosystem, (c) water retention and storage and thereby flood protection, and (d) protection of rare and endemic plant communities. The FS "pro-active management" (as defined by the FS Deputy Chief Chris French) involves automatic logging of old growth forests to avoid losing more trees. Yet excessive logging is the very reason so few old growth forests remain. The trees in old growth or "primary" forests should not be viewed as potential lumber to meet FS timber quotas. Instead "proforestation" should occur; where primary forests are managed to remain intact to allow them to grow to their full complex ecological potential.

(4) New Roads: New roads should not be constructed to "manage" old growth or mature forests. Of course, new roads would automatically disqualify "roadless" areas and prevent mature forests surrounding "roadless" areas from expanding the defined roadless areas and thereby expanding the valuable old growth forests. The creation of new roads increases CO2 emissions by removing carbon-generating vegetation, causes erosion in previously well-balanced ecosystems, harms the water retention capacity of old growth forests, and leads to vehicle emissions (i.e. increased CO2 emissions). New roads will automatically lead to increased use by motorized recreational vehicles leading to increased CO2 emissions. New roads and their resulting new access by recreational vehicles could also lead to an increase in human-caused wildfires in primary and secondary forests.

In summary, the best way to comply with the Biden Executive Order 14072, "to improve and expand the abundance and distribution of old-growth forests and protect them from the increasing threats posed by climate

change, wildfire, insects, and disease" is to permit primary ("old-growth") and secondary forests to thrive in their natural state without logging and construction of new roads.