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Comments: I submit the following comments for your consideration:

- 1. Add to Management Approach 1.b on page 23 an additional purpose of: "To increase carbon sequestration", to be consistent with Executive Order 14702 which notes in section 2 "My Administration will manage forests on Federal lands, which include many mature and old-growth forests, to promote their continued health and resilience; retain and enhance carbon storage;"
- 2. Add to Standard 2.a on page 29 an additional bullet regarding proactive stewardship of "enhancing carbon storage", for the same reasons noted in item 1 above.
- 3. Modify the description of Ecological Functions on page 80 to clarify that old-growth forests not only store carbon, but also continue to remove CO2. As noted in Stephenson, N., Das, A., Condit, R. et al. Rate of tree carbon accumulation increases continuously with tree size. Nature 507, 90-93 (2014). https://doi.org/10.1038/nature12914: "Thus, large, old trees do not act simply as senescent carbon reservoirs but actively fix large amounts of carbon compared to smaller trees; at the extreme, a single big tree can add the same amount of carbon to the forest within a year as is contained in an entire mid-sized tree."
- 4. Add to the list of unique ecological consequences of the various alternatives starting on page 103 the impact on carbon sequestration, since carbon sequestration is clearly an ecosystem service, as noted in the DEIS on page 82 which notes that "national forests and grasslands contribute to communities by providing ecosystem services (ranging from clean water, carbon sequestration, and biodiversity to subsistence foods, recreation opportunities, and inspiration);" Additionally, doing so is consistent with Council on Environmental Quality, 2023. National Environmental Policy Act on Consideration of Greenhouse Gas Emissions and Climate Change. Federal Register Vol. 88, No. 5, January 9th, 2023, which states that "when conducting climate change analyses in NEPA reviews, agencies should consider: (1) the potential effects of a proposed action on climate change, including by assessing both GHG emissions and reductions from the proposed action; [hellip]"