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

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Comments: I am writing in response to the Forest Service Draft Environmental Impact Statement (DEIS) to

protect old-growth and mature trees.

Protecting mature and old-growth trees throughout America is vital to our future. These trees and forest ecosystems are unique and invaluable in many ways. They protect our climate by absorbing and storing carbon, are more resistant to wildfire, regulate temperatures and provide cooling through evapotranspiration, recharge aquifers and prevent erosion, filter drinking water, increase biodiversity of plants and wildlife, and provide recreational and spiritual opportunities for people of all ages. Logging them deprives us of the many unique benefits that old-growth trees provide.

Cutting down old-growth trees to allegedly save communities from potential wildfire threat is a false solution. It has been shown that clearcutting allows winds to blow embers farther thus spreading wildfire faster, and replacement trees of the same size and age are far more likely to burn than older trees of diverse sizes and ages. Old-growth trees are worth far more standing.

The DEIS fails to protect old-growth trees and forests. The proposal allows old-growth trees to be sent to the mill and allows agency staff to manage old-growth out of existence in pursuit of "proactive stewardship" goals. The draft also contains ambiguous language that could be used to justify continued commercial logging of old growth forests.

The DEIS also fails to protect mature trees and forests. Mature forests and trees - future old growth - must also be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

The final record of decision should:

1. End the cutting of old-growth trees in all national forests and forest types and end the cutting of any trees in old-growth stands in moist forest types.

2. End any commercial sales of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill. It should instead remain in the forest and be allowed to slowly decompose, providing food and nutrients to other forest life.
I urge you to take this opportunity to protect our oldest trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores 500,000+ public comments the agency received on last summer's advance notice of proposed rulemaking.
Thank you.