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First name: Alison

Last name: Gallensky

Organization:

Title:

Comments: Thank you for preparing the Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement. I strongly support the conservation and recruitment of old-growth forests.

I urge you to strengthen this Amendment by addressing the fact that the best way in many cases to conserve old-growth forests and recruit future old-growth is through a hands-off approach. The current draft emphasizes proactive stewardship and Standard 2.a defines proactive stewardship as vegetation management. When the best available science and indigenous knowledge indicate that no vegetation management is needed for a specific forest type and location, then that should be documented in the Adaptive Strategy for Old-Growth Forest Conservation. In those cases, the requirement in Objective 2 for proactive stewardship projects is not appropriate and could lead to inappropriate vegetation management that reduces old-growth character instead of conserving it.

I suggest you either expand the definition of proactive stewardship beyond vegetation management to perhaps include research and monitoring and/or remove the requirement in Objective 2 for "at least three proactive stewardship projects/activities[hellip]"

Thank you for the opportunity to engage in this important initiative. I appreciate the time and effort you have put into this process. I am hopeful that we can continue to enjoy the benefits of existing and new old-growth forests now and far into the future.