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Title:
Comments: Dear Secretary Vilsack,

Please accept these comments on the Draft Environmental Impact Statement for the proposed amendment to the National Forest land management plans regarding mature and old-growth forest protection. These proposed amendments represent a once in a generation opportunity to provide substantial and long overdue protections for current old growth trees as well as recruitment for future old growth through protection and enhancement of mature trees and forests. Given the variety of forests within the National Forest System this is not a simple task. I live in the wet west side of the Cascade Mountains in Oregon, so my comments reflect the conditions our forests face in this part of the system.

I recognize that management options will vary with different regions however I think the following should hold true for all mature and old growth forests in order to meet the intent of Executive Order 14072. I support Alternative 3 with the following comments/changes:

* End the cutting of mature and old-growth trees in all national forests and across all forest types. The Draft EIS minimizes the impacts of logging as a threat however here in the Pacific NW we continue to see logging of mature and old-growth trees, especially if part of a mixed forest sale. Logging not only threatens individual trees but increases the likelihood of soil compression, introduction of invasive species, reduction in biodiversity and soil drying. All these lead to increased stress on trees and ecosystems and increased vulnerability to the threats identified in the document. The Draft EIS needs to recognize the overarching and critical threat from logging, not minimize it.

* End all commercial exchange of mature and old-growth trees, including post-fire. Even if removed for safety reasons the trees should be left standing to the extent possible (i.e. remove only as much as necessary to reduce the hazard), or, if fully cut for safety reason, the tree should be left in the forest. This will sequester carbon as long as possible while also providing important habitat and protect water quality. Any allowed removal of mature or old-growth trees post fire or for safety reasons should be the exception.

* Provide clear guidelines for recruitment of trees for future mature and old growth. This process for recruitment was very unclear in the draft EIS. There needs to be an expansion on this process and a clearer map for how future old-growth will be recruited.

* Close loopholes in management plans that allow for discretionary removal of mature and old growth trees. "Fuel reduction", "fire prevention" and "proactive stewardship" are examples of vague terms that are too discretionary for true protection.

* Rely less on active intervention (aka "stewardship") and more on management restraint. Many of these mature forests are in a state of balance and less active intervention is wiser and less costly.

* Thinning should only be used in tree plantations and then based on regional science-based desired future conditions for mature or successional forest planning. Thinning should not be used as an excuse or loophole for commercial logging.

* Remove Standard 2.b that allows for "incidental" removal of old-growth trees. This is a huge loophole and is contrary to the Executive Order.

* Remove Standard 2.c.iv that allows for "de minimus" use (removal) of old growth trees for local community purposes. It is unclear what this would be and why this exception is needed.

Thank you for the opportunity to provide comments on this critical amendment.