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Comments: Comments for consideration of USDA Forest Service, and advisory committee.

The DEIS's analysis that wildfires are the leading threat to mature and old-growth forests is contradicted by recent studies. Berner et al. (2017) and Harris et al. (2016) found that logging accounts for a far larger share of forest carbon loss compared to wildfires and insects. Logging-related emissions are five times greater than those from wildfires in regions such as Oregon, Washington, and California (Hudiburg et al., 2019). By allowing logging under the pretense of proactive stewardship, the DEIS disregards the significant carbon costs associated with timber harvests and the critical role of these forests in meeting the 30x30 conservation goals outlined in Executive Order 14072.

Additionally, the DEIS lacks a clear framework for identifying and protecting mature and old-growth forest areas, leaving these ecosystems vulnerable to degradation. The document should include specific guidelines for using Geographic Information System (GIS) and other penitent styles of mapping to precisely delineate old-growth areas and ensure transparent management practices. The absence of such detailed forest inventories and the reliance on statistical sampling methods undermine the potential for effective conservation. Implementing a science-based, spatially explicit strategy would support the recovery and expansion of old-growth characteristics across national forests, as suggested by Law et al. (2021) and the USDA Forest Service (2024).

To address these issues, I recommend that the DEIS be revised to explicitly prohibit all commercial logging in mature and old-growth forests, including those that have not yet been fully inventoried or mapped.

The Forest Service must prioritize the protection of mature and old-growth forests as a national and global imperative. Strengthening the DEIS to fully safeguard these ecosystems from commercial exploitation will demonstrate the United States' commitment to addressing the climate crisis and preserving biodiversity. It is imperative that the final version of the NOGA reflects a proactive approach to conserving these irreplaceable natural resources.

Thank you,