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Comments: I applaud the U.S. Forest Service for undertaking this process to protect the nation's Old Growth forests. As a 70 year-old African American (AA) man who has lived in Alaska as an army brat and a current resident of Colorado, I've had opportunities to hike and play in a number of national forests - an experience not typical of many AA people likely due to complex histories of travel restrictions aimed at AAs. Besides the multiple personal benefits that accrue when one visits a national forest, I am also aware of the important roles that old growth forests play in mitigating climate change.

With that background in mind, I'm recommending that Standard 3 be revised to specify that proactive stewardship in old-growth forests shall not result in commercial timber harvest. As currently proposed, proactive stewardship including vegetation management could include timber harvesting as long as timber harvesting is not the (primary) purpose of proactive stewardship activities. Without strict restrictions to commercial timber harvesting, I fear that it will be too tempting for some to use this loophole to cut old growth trees under the guise of proactive stewardship. I'd like to believe that by strictly prohibiting commercial timber harvesting in old growth forests, these forests will be enjoyed by AAs in a more just future and can continue their function in mitigating climate change.