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First name: James & Mary

Last name: Costello

Organization:

Title:

Comments:

Please accept these comments on the Draft Environmental Impact Statement (DEIS) for the Forest Services' proposed Amendment to Land Management Plans to Address Old-Growth Forests Across the National Forest System.

Although President Biden has directed you to protect the remnants of old-growth forests and mature trees that remain on forest service lands to help combat climate change, this management plan has many obvious flaws that need to be remedied.

As residents of Northwest Montana who live adjacent to national forests, and recreate extensively on four national forests (Kootenai, Lolo, Panhandle, and Coeur d' Alene), we have a personal connection and a stake in how our forests are managed now and in the future. One of us is a retired career land management professional who has worked for both the National Park Service and the US Forest Service, and one of us was trained as an avian ecologist.

We have seen extensive log sales targeting mature and old-growth forests-some of which have been legally challenged and stopped, and others that have been, and are being, carried out at a dizzying speed. We also have seen the Forest Service allow large swaths of mature and old-growth forests to be burned, including roadless areas with wilderness characteristics, especially at higher elevations, at the expense of the protection of human structures in the valleys.

A plan that prioritizes the protection of our old-growth and mature forests is critical to combat climate change, protect biodiversity, and ensure healthy watersheds and ecosystems. An alternative that reflects this need and accomplishes the goals set out in the President's Executive Order 14072 regarding old forest conservation, the President's commitments to the Paris Climate Agreement, and the Glasgow Leaders' Pledge to end deforestation and forest degradation is needed.

Our main concerns with the plan, as outlined in the DEIS, are that it fails to protect old-growth forests by continuing to allow road-building and logging of old-growth trees, and, at the same time, fails to protect mature forests, which are the source of future old-growth trees. These are both serious omissions, which undercut the intended purpose of the plan.

We disagree with the assertion that thinning old-growth protects it from fire. This is "junk science" used to promote logging and has been debunked by experts in fire ecology. Denser, mature forests burn at lower intensities, while forests that are thinned and logged for fuel reduction generally burn hotter because the stand has been opened up to sun and desiccation.

It is time for the Forest Service to move away from its intense focus on "getting out the cut" at all costs, and to start viewing our forests in a broader, holistic manner as ecosystems that store carbon and help slow down climate change, provide healthy watersheds, and protect biodiversity. Creating a land management plan that actually protects old-growth and mature forests from commercial logging, fire, and disease will help accomplish this goal. Now is the time to act as our climate continues to warm.

Thank you for considering our comments.