

Data Submitted (UTC 11): 9/20/2024 6:33:38 PM

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Comments: Although I support the VISION of the USFS Draft National Old Growth Amendment, I DO NOT support the amendment as it is written because it will not lead the way to achieving a system resilient old-growth forests. Specifically:

--The Desired Conditions should address the current deficit of old-growth throughout the USFS system by including language about INCREASING the amount of old-growth forests.

--The plan should require conservation of mature forests now, so they can become old-growth for the future.

--Intensive management of old-growth in wet climates (i.e. west of the Cascade Crest) is unnecessary and harmful to forest structure and understory. Management of old-growth forests should be fine-tuned based on forest type and climate.

--The standards as currently written in the preferred alternative Standard 2c. allow for too many inappropriate exceptions that could lead to meaningful loss of old-growth forests. While exceptions for tribal use are appropriate, all of the others should be removed from the plan.

--The Amendment should recognize that new wood product technologies, such as cross-laminated timber, can achieve forest restoration and fire resilience goals, while supporting local timber-related jobs.