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Comments: Thank you for considering the future of old-growth forests in revising the forest plans of US National Forests. I am a botanist and hiker with forestry inventory experience, who relies on our public lands forests for my mental and bodily health.

I support an alternative you didn't create--a modification of Alternative 3 that provides additional clarity to the protection of old growth, and supplements this with protection for mature forests.

My concerns are not with the integrity of the public officials involved, as I believe the USFS is generally serious about this effort. My concerns lie primarily with the vagueness that remains in this directive, and the fact that this vagueness will allow political and economic pressure to be exerted on public officials to act outside the spirit of the plan direction.

To minimize the influence of such pressures, please modify Alternative 3 as follows:

1) End all commercial exchange of old-growth trees. If old-growth trees must be cut, allow them to remain on site, so that there is no chance that profit will be made from rules being bent. A side benefit is that down trees on site will continue to provide benefits to wildlife habitat and soil.

2) Rather than leave the definition of mature and old growth up to local officials, use a system based on the best available science that will provide officials an objective basis for delineating stands meeting the criteria, such as Barnett et al in <https://doi.org/10.3389/ffgc.2022.1070372>.

Furthermore, to ensure that old-growth forests persist in the future, please modify Alternative 3 additionally as follows:

3) Provide explicit protection to mature forests. Without a continuing source of recruitment to old-growth, we will see a continuing decline, which we can no longer afford. Any management occurring in mature forests must be primarily focused on resilience and encouraging old-growth characteristics, rather than providing wood products. Assessments of such management needs should be made using the best available science.

4) Incorporate rules in the planning process that ensure that timber sales are implemented according to the guidance. The Secret Creek sale on the Rogue River-Siskiyou NF was recently withdrawn because it was found to have not complied with the Upper Briggs EA. The violations were apparently discovered only when pointed out by private citizens with the Klamath Forest Alliance. Whether the improper marking was due to an oversight or not, given how little old-growth remains due to past USFS practices, we cannot continue to lose it.

5) Better, due to the seeming difficulty of ensuring that old-growth in sale areas will not be cut, and the ecological damage due to fragmentation, introduction of exotic species, disturbance to wildlife, etc., in old-growth due to logging in immediately adjacent areas, no commercial timber sales of any kind should be performed in areas where old-growth trees are present.

Thank you for the opportunity to comment.