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Comments: Thank you for the opportunity to submit comments on my thoughts and suggestions related to the National Old-Growth Amendment DEIS Position Statement of August 2024. I believe it is imperative to conserve and steward old-growth forests in all units of the lands managed by the USDA Forest Service across our country. Further action is needed to conserve mature trees and maintain conditions to support their growth as they age into old-growth forests stands. To do that it will be necessary to monitor the condition of such stands as they grow and to manage them to support their growth.

While alternative 2 has many admirable components to it, I believe it should be revised to support proactive stewardship of old-growth trees in a way that would support the composition, structure, pattern and ecological processes necessary for old growth forest to be resident, adaptable to stressors that develop over time and into the future such actions as are needed are practiced by forestry staff.

Commercial tree harvesting should be prohibited in all old-growth forest areas. Timber sales too generate revenue and can be supportive of local economies, but the actions needed for harvesting can cause significant damage to the trees themselves and the areas where they are growing. Consequently timber harvesting should not be a driving factor when making decisions about management practices in areas of old-growth trees.

Mature trees can develop into old-growth trees over time and consequently will need management direction that fosters their protection. Guidelines for designating stands of mature trees as potential old-growth trees need to be developed and included in this document. A proper representation of all forest tree types within each management area must be maintained.

The DEIS seems to view climate change impacts as being detrimental the health of old-growth trees. While increasing temperatures, large scale fires, and changes in the amount of precipitation could be negative factors for the growth of old-growth trees, it is important to recognize that the conservation of these trees can significantly mitigate the impacts of climate change. Old-growth trees store large amounts of carbon by sequestering it in their biomass, roots, and the soil beneath their canopy. They retain a high level of nutrients , consequently there is less transport of nutrients in surface runoff, which leads to higher quality water in nearby streams and they release that water slowly which extends the time period of stream flow from their growth areas. Old-Growth forests provide an opportunity to combat the impacts from climate change. This fact should be included and explained throughout the document.

I would suggest that Standard 1 from the Notice of Intent which stated that management activities must not degraded or impair old-growth forest be incorporated through out the document. A requirement that areas of old-growth forest continue to meet the definition of old-growth forests managed for the purpose of proactive stewardship should also be found throughout the document.