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Comments: I commend the Forest Service for recognizing the important role played by old growth forests in carbon storage and mitigation of climate change. I am a retired BLM national Program Manager/Division Chief for Wildlife and Forestry and worked in four Forest Service Regions in the West. The condition of old growth forests in each region varies considerably as does its response to management. I support Alternative 2 of the DEIS with the following modifications:

Commercial timber harvest should be restricted to fire-dependent forest ecosystems that are outside the normal fire return intervals and should emphasize thinning from below to retain the largest trees and forest structure. Coastal forests in the Pacific Northwest and Alaska are not fire dependent and any human intervention should be minimal.

Standard 2 b, that allows for cutting within old growth forests when "incidental to the implementation of a management activity" should be restricted to management activities that protect health and safety and not for general forest management projects such as road construction or recreational facilities. I encourage the Forest Service to replace this standard with Standard 1 from the NOI, which required management activities to not degrade or impair old-growth forests unless required for human health and safety.

With less than 10 percent of historical old growth forests remaining outside of Alaska, additional attention and management direction is needed for mature forests, as potential future old growth forests. Managing some percentage of mature forests to increase the likelihood that they achieve the structure and age classes needed for replacement old growth is important in light of the current impacts of climate change on remaining old growth forests. Additional management direction should be incorporated to designate and manage mature stands with the highest likelihood of developing old growth characteristics.

Thank you for the opportunity to provide comments on this important forest management activity.