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Comments: Dear Chief Moore,

Abstract: Section 2(c)(ii) of Executive Order 14072 directed the Department of Agriculture to develop policies to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands.

In order to accomplish this, the National Old-Growth Amendment must end the cutting of mature and old-growth trees in all national forests and all forest types. Allowing the continued commercial exchange of old growth trees will only lead to creative excuses to continue business as usual. In the rare case where an older tree must be cut for public safety, that tree should be left in the forest and not be sent to the mill.

Alternative 2 comes the closest to fulfilling the word and spirit of the executive order, but it still needs to be strengthened.

As written, the proposal does too little to recognize the important role of mature and old growth forests in climate mitigation, biodiversity, water management and irreplaceable ecosystem services.

The amendments as written also fail to acknowledge the different approaches needed in different forest types. For instance, the dry-side forests east of the Cascade crest have evolved in a frequent, low-intensity fire regime. Thinning young trees may be necessary to counteract the last hundred years of total fire suppression, and lower the chances and extent of large crown fires.

In the wet forests west of the Cascade crest, thinning mature stands is counterproductive, as it reduces the forest's ability to sequester carbon and absorb and retain water. Water storage in mature forests is critical both to municipal water supplies and to ecosystem services, and is necessary for the continued survival of salmon and the orca whales and fishermen who depend on them. "Thinning" Westside forests only increases the risk of fire. Management practices also need to acknowledge and counteract previous habitat fragmentation, and allow for the maturation of stands linking smaller patches of mature and old growth forest, to re-create viable habitat for spotted owls and marbled murrelets. "Proactive stewardship" can be used to nudge current plantation stands toward old growth characteristics, but are inappropriate in existing mature and old growth forest.

Post-fire "Salvage" logging should be banned in old-growth and mature forest stands; it damages the soils and inhibits regeneration.

Any actions taken in old growth, mature forest, and potential mature stands need to be subjected to transparent and timely outside review.

Please keep in mind that you can't save trees by cutting them down, mature trees are worth more standing, and if you don't let trees grow, there won't be any more mature trees!

Thanks for allowing comments. Please do consider them.

Jana Hobbs