

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

First name: Patricia

Last name: Fischer

Organization:

Title:

Comments: To: Chief Randy Moore, US Forest Service

In regard to the Proposed National Old Growth Amendment.

I am encouraged to see the US Forest Service address the preservation of Mature and Old Growth Forests that protect the wildlife dependent on old growth, such as the spotted owl and the marbled murrelet which live in the PNW forests of my region, filter water to produce the clean water I drink from the McKenzie River of the Willamette National Forest in my backyard, provide abundant recreational opportunities for myself, my neighbors and my family and are a free high carbon storage option to fight climate change.

I urge the USFS to adopt Alternative Two with the following changes:

The exceptions contained in Alternative Two are too broad and Standard 2b defeats the purpose of the amendment.

Reinstate Standard 1 from the Notice of Intent which states management activities "must not degrade or impair" old growth forests.

Clarify that commercial timber sales occurring as a result of vegetation management will not include any old growth trees. Only the younger trees within old growth stands would be allowed to be thinned.

Mature forests need to be defined and stewarded towards old growth status. There are no protections in any of the Alternatives for mature forests. Protections need to be added in order to recruit these stands to become future old growth.

Definition of old growth should not be based on size alone as not all forests are the same. Definitions must vary by forest type so characteristics such as bark color and canopy conditions, which can be better estimates for tree age than size alone, would be considered. Dry versus Wet forests need to be defined differently. Draft policy, as written, could inadvertently promote ill-informed logging in remaining old growth forests and remove old growth trees that are smaller than a stated diameter limit.

The timeline for the development of adaptive strategies for old growth forest conservation which is intended to address recruitment of mature forests may not be feasible in the two years allotted and I would urge an expansion of this timeline to produce real, meaningful adaptive strategies.

Please include passive management as a viable approach to preservation of old growth forests and recruitment of mature forests.

And for God's sake save the Tongass.