Data Submitted (UTC 11): 9/20/2024 4:00:00 AM First name: Larry Last name: Hanson Organization: Title: Comments: Dear Chief Moore, Agriculture Secretary Vilsack, and President Biden:

Thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) entitled "Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System."

The DEIS draft fails to include a range of alternatives that would protect mature and old growth forests from commercial logging, other management activities. Therefore, the document is inadequate to address climate change, especially that logging-related impacts are ignored.

The following points should be considered:

* Careful field based measurements show that carbon emissions from logging (including commercial fuels reduction/thinning), far exceed carbon emissions due to wildfire[3], thereby showing the climate impacts of logging have been far greater than wildfire.

* Cumulative impacts of commercial extractions including tree mortality[4], loss of soil, loss essential understory, and associated biodiversity.

* Scientific data shows that an abundance of standing dead trees (snags) do not increase fire spread or fire severity.

* Scientific data showing that an abundance of snags (standing dead trees created by wildfire and/or insects etc.) provides critical habitat for multiple listed and imperiled species including fisher [5] and spotted owl.

* Restoration actions, as described in the DEIS, include clear-cutting[6] -has negative impacts clearly identified in the scientific literature.

* Post-fire regeneration has been demonstrated in multiple studies (e.g., abundant giant sequoia regeneration[7]

within intensely burned patches).

* Forest extraction ("thinning," "fuels reduction," clear-cutting) actions have resulted in high severity fire when they burn - as shown by government scientists[1] as well as independent scientists[2] published in the scientific literature.

The thrust of your policy should be to eliminate logging and reduce management activities on forests so that forests can maximize their sequestration to mature and eventually old growth forests. Besides meeting climate goals, this will also make our forests more resilient in other ways to catastrophic fires and other watershed protections.

Thank for considering these comments that will be essential for working out how we survive on this planet.

Larry Hanson