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Comments: Based on my doctoral study of old-growth forest history, these are the recommendations I have:

*Issue an immediate moratorium on cutting any already-identified old-growth forests on US federal lands during this information-collecting phase of the E.O.

*Do not cut old-growth forests!

*Forest managers should seek out local and indigenous knowledge sources. Best forest management practices should be based not on forest science alone, but also on place-based knowledge systems developed over centuries, especially indigenous knowledge but also localized knowledge sources.

*Fully implement the executive order to conserve old-growth and mature forests

*Use an inclusive definition framework that errs on the side of considering more forests old growth or mature

*Define old-growth based on old ecological processes rather than just old trees (i.e., include forests that have never been logged but have been subject to disturbances like tornados or wildfires)

*Incorporate existing regional old-growth forest inventories.

*Refrain from conflating future old growth with existing old growth. Existing old-growth forests are needed even if there are forests reserved from logging expected to age.

*Include large spatial scales ("minimum dynamic area") where old-growth and surrounding growth are protected for landscape resilience

*Stand size (acreage) should not be a limiting factor in any old-growth definition.

Again, please err on the side of inclusivity and protection of old-growth and mature forests. Thank you for your consideration!