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Comments: I welcome President Biden's EO 14072 and its recognition of the need to rethink how old-growth and mature forests are managed and protected on federal lands in the United States. Despite its ambitious scope and analysis, I believe that the Draft Environmental Impact Statement falls short of what should be the goals of conserving these integral, important elements of a diminishing forest ecosystem that ensures good health and ecological succor for human and non-human communities in myriad ways. I believe the American people desire something better than the pending EIS to ensure that old growth and mature forests prosper for generations to come.

Nature is always "dynamic". The EIS recognizes that many of the present day challenges to our federal forests are the result of past management policies. Yet in addressing future management initiatives to protect old-growth forests over so vast a range of ecologically diverse public lands, the "proactive stewardship" framework of the EIS contains the sort of ambiguous language and potential loopholes that could lead to the removal of old-growth trees by commercial logging interests and in ways other than "timber harvest". In a similar fashion, the EIS should make a stronger commitment to seeing that mature forests can develop into future old-growth.

In brief, any assumed future threat to forest health during a time of unprecedented, often unpredictable climate disruption should be tempered by greater safeguards against hasty management decisions that favor big-tree cutting as a remedy.

The mutually exclusionary nature of Alternative 2 (preferred) and Alternative 3 is most telling, as is the rejection altogether of designated areas in specific national forests where old-growth and mature forests would be fully protected. I believe that a better policy would allow for the creation of science-based designated areas where natural forces can adapt to "dynamic" circumstances without any management applications, including tree-cutting or incidental timber removal. Much could be observed, learned, and gained in the way of ecological value from such designated areas. Doing so would also prioritize other management areas in ways that conserve and better administer the resources of the U.S. Forest Service in its responsibilities.

Finally, I commend that the EIS calls for increased engagement with indigenous communities and the application of indigenous knowledge, not least of all in the way of expanding the use of indigenous fire regimens. Accordingly, I support the development of new programs and increased funding to help further the education, training, and organization of indigenous communities toward a goal of greater participation in realizing healthier, more resilient forests on federal lands.

Thank you.