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Comments: I am writing to comment on the Draft Environmental Impact Statement (DEIS),

It is imperative that mature forests can develop into tomorrow's old growth. but you must double down on preventing logging of our forests where mature and old growth trees live.

There are countless species who depend on these old growth forests as habitat, food sources, and many wildlife corridors or migratory pathways cross right through mature and old growth forests. Once these trees are destroyed bears lose important ancient pathways and grizzlies can't establish contiguous pathways from one population to the next as it is. Grizzly bear habitat and forest harvest frequently overlap. Please remember that Grizzly bears are commonly used as a focal species for conservation planning throughout their range in wester North America for a variety of ethical, cultural, political and ecological reasons.

As you know, you were sued for your approval of the Black Ram Project, a massive logging project that would clearcut thousand of acres and log mature and old growth forest in the Kootenai National Forest to be commercially logged, including clearcutting more than 1,700 acres and logging hundreds of acres of centuries old trees. The logging and road construction would threaten an imperiled population of grizzly bears on the Montana-Canada boarder and release carbon into the atmosphere. That logging is said to continue for a decade. More than 190 species of bird and wolves, Canada lynx, wolverines, mountain goats, bighorn sheep and black bears roam the forest. All of these lost trees equal lost habitat and this way our Grizzlies lose migration pathways.

According to President Biden's Executive Order you are to "develop policies, with robust opportunity for public comment, to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forest on federal lands." We call on you to follow through on this order by finalizing stronger standards to protect old-growth, ending commercial logging of old-growth, and by issuing strong protections for net gain of old-growth forests through robust protection of mature trees from logging in order to combat the extreme historic losses of these forests.

While the stated goals within the DEIS represent a strategy long needed for the country's forests, the current policy as written must be strengthened in order to meet these goals.

Old-growth trees should never be logged or allowed to be sold.

The "Proactive Stewardship" that the policy currently promotes for old-growth forest management should never be permitted to degrade the very conditions that define an area as old-growth. Managing old-growth away goes against the very spirit of the executive order.

The management of old-growth should not allow any logging within old-growth of moist forest types, even of younger trees.

Establish requirements for measurable goals and planning for recruiting future old-growth from forests that are currently classified as mature to make up for historic losses of old-growth due to logging. Do not cut forests that are our best candidates to age into old-growth.

Our mature and old-growth forests represent a climate solution that is available right now and costs nothing to develop. These forests take centuries to develop and provide immense climate and biodiversity benefits. We are excited about these steps being put into place, but want to make sure that as these policies are further developed they do not undermine our ability to keep these forests intact.

Thank you for addressing these important issues.