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Comments: Thank you for the opportunity to submit comments on the June 2024 Draft Environmental Impact Statement ("DEIS") regarding Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System ("Old-Growth Forest Amendments").

The Old-Growth Forest Amendments DEIS was intended to advance President Biden's 2022 Earth Day executive order to conserve and restore America's mature and old-growth forests. The Biden administration's executive order was issued because mature and old-growth forests are vital to providing clean water, absorbing carbon pollution, and supplying habitat for wildlife. This initiative is important because the federal government manages approximately 32 million acres of old-growth (18% of federally managed forest land) and 80 million acres of mature forests (45% of federally managed forest land), for a total of 112 million acres on federal land.

However,, the Old-Growth Forest Amendments DEIS falls short because the Old-Growth Forest Amendments DEIS limits itself to the management of old-growth forests, And Not MATURE FORESTS, and fails to provide a national structure for the management of forests that have a strong likelihood of becoming the next generation of old-growth forests. This is contrary to the Biden administration's mandate, and fails to preserve and guarantee old-growth forests for generations to come. We Must Emphasize the protection and preservation of tomorrow's old-growth forests-mature forests-as a tool to protect against ongoing and future impacts from climate change. Moreover, older trees are more fire resistant and stronger protections for mature trees would not materially impact the U.S. Forest Service's ability to address and plan for wildfire risk.

The U.S. Forest Service provides too many loop holes. The Old-Growth Forest Amendments DEIS should be amended to include logging or harvesting activities in old-growth forests ONLY where it is absolutely necessary for the protection of the forests or human health and safety.

I have an interest in the Old-Growth Forest Amendments DEIS given that the SNF has approximately 100,000 acres of old-growth forest and 460,000 acres of mature forest. Sadly, in the 2004 Forest Management Plan, "[m]any of the stands meeting existing old growth criteria, and others that have high potential for meeting these criteria in the not too distant future, would be available for timber management activities. Therefore, the pool of stands with old growth potential could be significantly reduced.

Unless the Old-Growth Forest Amendments DEIS is broadened To Include the Protection of Mature Forests and strengthened to PROHIBIT THE HARVEST of MATURE FORESTS, except in the most necessary instances, the U.S. Forest Service will both fail the Biden administration's charge and the American people by slowly eroding existing old-growth forests and not protecting the next generations' old-growth forests.

Thank you for your consideration

Margot Monson, entomologist

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