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Comments: I am writing to comment on the Draft Environmental Impact Statement (DEIS) that addresses President Biden's Executive Order 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." I'm asking the Forest Service to finalize meaningful standards for protecting old-growth forest and end commercial logging of old-growth. 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.

I am a tree geneticist, working for a nationally acclaimed arboretum. My research has demonstrated to me the immense value that old-growth trees provide not just ecologically, or as carbon sinks, but as adaptive resources for healthy forests to persist well into the future. Old-growth trees are more likely to withhold rare genetic mutations which are adaptive to climate conditions that younger trees have not experienced within their lifetimes. When we lose old-growth, we lose those mutations, and by doing so, we hamper the entire forest's ability to withstand future climatic changes.

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. 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.