

Data Submitted (UTC 11): 9/19/2024 4:00:00 AM

First name: Ellen

Last name: Herlant

Organization:

Title:

Comments: Thank you for taking public comment and for valuing the many voices of the public.

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." 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. And for listening to the public. And for working so hard to steward our public lands and the environment.

Kind regards,

Ellen Herlant