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Comments: As an Oregonian, a natural history author, birder, environmentalist, and avid hiker of ancient forests, I first commend President Biden on his executive order to protect mature and old-growth forests. However, I am extremely disappointed to see how the Forest Service interprets that very clear order.

Cutting down old-growth trees to save them from potential threats is a false solution. They are worth more standing. I'm not just referring to the individual trees that big or old, but to the ecosystems that function together. It's vital not to separate out the individual old growth trees from what makes an old forest or ancient forest-high in biodiversity.

When I wrote the story, The Secret Power of Old Growth ( <https://columbiainsight.org/the-secret-power-of-old-growth/>), I included this definition:

Rather than calling the trees "old growth," a 2020 British Columbia Provincial government task force offered a mosaic definition: "Old forests meld light and dark; their structural complexity can include large old living trees, large standing dead snags, long downed logs, a multi-layered canopy, horizontal patchiness with canopy gaps that allow understory growth, and hummocky micro-topography."

While "old growth" remains a common term, most forest scientists prefer terms such as "intact," "old" or "ancient" forests, reflecting processes that shape these unique ecosystems over centuries.

Our few remaining older forests are more vital than ever to protect for their enormous stocks of carbon that are essential to lowering excess carbon in the atmosphere from fossil fuel burning. While we must stop putting CO2 into the air that's the major cause of the heat, drought, and megafires in the West, we also have to assure our old growth and mature forests are protected and when the big trees fall, they remain in the forest-not logged and hauled off to mills.

The Draft Environmental Impact Statement (DEIS) is filled with loopholes, fails to include mature forests for protection, and fails to put forward true protection. There should be NO old growth trees sent to mills. "Proactive stewardship" is the buzz phrase that is allowing the agency to "manage" old growth with chainsaws and interfere with our few remaining intact forests with little to no concern for the biodiversity and exquisite relationships of plants, animals, and insects. Forestry and silvicultural goals are not ecological ones. I'm also concerned with language that could justify more logging of old growth in the Tongass National Forest of Alaska-where so much is gone already and the importance of what remains is vital to preserve.

The preferred alternative has alarming chainsaw remedies for fixing what doesn't need to be fixed. The number one threat to old growth within national forests is logging. (See <https://www.climate-forests.org/worth-more->

standing). It's outrageous that both the Forest Service and the BLM continue to target old growth for logging, and disregard the logging as unimportant compared to wildfire, insects, and disease (all natural forces-the problems come in because of excess fossil fuel burning that is leading to challenging conditions -that can only be remedied by stopping adding CO2 and protecting the big trees from logging).

Please adopt a record of decision that is an improved version of Alternative 3 of the DEIS. I support the one that you will be receiving from a coalition of national, regional, and local conservation and public interest organizations.

The final record of decision should:

1. Protect the old-growth ecosystem-the big trees and the interconnected understory, midstory, and high canopies, and the natural gaps created by native insects and fungi at work, individual trees falling down, and wildfire mosaics.
2. Protect old-growth trees from being cut down for commercial or noncommercial reasons and sent to a mill.
3. Protect mature forests and trees-future old growth-from commercial logging to recover old growth lost to past mismanagement.
4. Prevent all "salvage" logging after fires burn in mature and old-growth forests-keeping the trees and soils intact is critical for carbon storage and natural renewal.

Failure to protect our oldest trees and forests undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores 500,000+ public comments the agency previously received.

The Forest Service has this once-in-a-lifetime opportunity to save a legacy for future generations. Please honor the will of the people and the intricate relationships of older forests that have evolved over the millennia.

Thank you. (Note-I have two relevant attachments that I have authored).

ATTACHMENT: Simplicity and Complexity\_ Thoughts on ...ts Kingfisher Journey- Marina Richie.pdf - a narrative about simplicity and complexity in ecology and decisions about managing forests, suggesting other ways to look at forests and fires than the proposed solutions involving cutting the forests

ATTACHMENT: The secret power of old growth - Columbia Insight.pdf - article in Columbia Insights news about the importance of old-growth forests written by commenter