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Comments: Writing in favor of improved and strong protections of the US old growth forests. The plan as presented seems strong and thorough.

Beginning with inventory, analysis and the completion of the EIS we urge that there be true independence in who completes the EIS, documentation and analysis, without use of firms with close ties to industry or political interests. Too often the firms completing the EIS are not independent and work for extraction/forestry industry and lobbyists. Experts should support the mission to preserve old growth. We support the intent, "... the importance of mature and old-growth forests on Federal lands for their role in contributing to nature-based climate solutions by storing large amounts of carbon and increasing biodiversity, mitigating wildfire risks, enhancing climate resilience, enabling subsistence and cultural uses, providing outdoor recreational opportunities."

We are concerned that a "threat" should include loss of ecological function and integrity, to include:

1. threat from invasive species,
2. threat from existing or added infrastructure, for example pipelines that could cause aquifer breaches which potentially affect forest health in numerous ways, and heat (from heated materials sent through pipes, or heating of pipe itself to move materials through pipe) affecting soil, overall ecology, wildlife (aquatic, amphibian, avian or mammalian), and others yet unknown. Suggest analysis include drone heat-sensing baseline analysis to be able to track any changes that may occur.

We applaud the requirement to collaborate with tribes and Alaska Native Corporations. We too want to insure the use of Indigenous knowledge and wisdom, including a land ethic that treats the land as an entity unto itself, with full rights and protections. The Indigenous worldview with respect to land management and care should be incorporated throughout.