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Comments: We need solutions that match the magnitude of the threats we face. Conserving mature and old-growth forests on federal lands is a critical natural climate solution that will have a meaningful impact on the climate crisis and biodiversity crisis. We have a moral imperative to act boldly for future generations.

Mature forests and trees need explicit protection. The country has lost most of its old growth to over a century of logging. Mature forests provide the bulk of the climate benefits on federal forests and are the nation's future old-growth.

The final record of decision should adopt a modified Alternative 3:

End the cutting of old-growth trees in all national forests and all forest types and end the cutting of any trees in old-growth stands in infrequent fire forest types.

End any commercial exchange of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill. (Alternative 3 includes a "no commercial exchange" provision.)

Remove the exception that allows for "de minimis" logging of old-growth trees.

Eliminate the agency discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals.