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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 and biodiversity crises. We have a moral imperative to act boldly for future generations.

Alternative 3 should be modified to 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. It should also 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. Furthermore, it should remove the exception that allows for "de minimis" logging of old-growth trees and eliminate the agency discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals.

Additionally, it is extremely disappointing that the agency has ignored public calls to adopt standards for protecting mature trees and forests. The adaptive strategy directs National Forests to look for forests for OG recruitment, but it's all left to local discretion. Part of the "purpose and need" of this policy is ecological integrity. Without specific mature forest protections, the agency will fail to recover the abundance and distribution of old-growth forests and will undermine its ecological integrity objectives.