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Comments: The final plan should end the cutting and selling of old-growth trees on public lands.

Carbon storage and climate mitigation is largely missing from the draft proposals. Keeping mature and old-growth forests growing on federal lands will have a meaningful impact on the climate crisis and biodiversity crisis.

Part of the "purpose and need" of the President's order is a consistent approach to old-growth conservation. The extreme discretion and flexibility given to local managers in the DEIS undermines these objectives.

Part of the "purpose and need" of the President's order 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.

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.