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Comments: I applaud the U.S. Forest service for developing policy to safeguard old growth forests. Old growth forests provide many ecological and cultural benefits, from sequestering carbon to recycling nutrients and reducing water runoff, to recreation and spiritual renewal. My comments are on the Draft Environmental Impact Statement released on June 21, 2024 that describes guidelines for protecting old growth forests. The guidelines for management need to be strengthened as follows:

1. the definition for when a forest could qualify as old growth should be 100 years of age rather than the 150 years of age now proposed.
2. the "largely undisturbed" provision should be dropped as that can be used as a loophole to harvest forests that have a limited number of roads or trails or have had minimum timber harvesting, but still have old growth forest characteristics
3. commercial logging in old growth forests should be ended
4. plans need to be developed to increase old growth forests in the future. This should take an adaptive management approach and apply management practices appropriate to specific forest types.