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Comments: To Whom It May Concern,

Thank you for the opportunity to comment on this Draft Environmental Impact Statement. The importance of old-growth forests, particularly the role of ancient trees in promoting biodiversity and maintaining forests health is only recently appreciated, while so many of these trees have been lost to commercial logging. With only a small fraction of US forests containing virgin and old growth trees, it is crucial that the US Forest Service (USFS) update its approach to managing old growth and mature forests.

The new scientific discoveries highlight the genetic biodiversity, increased resilience, and complex interconnectedness within old-growth ecosystems, facilitated by mycorrhizal networks and interdependence among species. However, these findings have not yet been adequately reflected in USFS National Forest Management strategies, including this DEIS. While there is still much for scientists to learn, it is essential that USFS moves away from outdated practices of removing old growth trees in the name of "management practices" and "proactive stewardship". Human interventions cannot replicate the ecological balance that nature has perfected over millennia. Instead, USFS should adopt a more hands-off approach, especially in the few remaining old-growth forests.

The USFS's threat analysis downplays the risks posed by commercial logging and clear-cutting, raising concerns about the objectivity of this analysis, given the agency's role in managing forests for commercial purposes. Claiming that commercial logging is an "ecological management tool" in old-growth forests fails to acknowledge that these ecosystems are self-regulating and complex. Logging, especially for commercial purposes, has no place in preserving these invaluable ecosystems.

Many old-growth forests, particularly in the Pacific Northwest and the eastern U.S., do not require active management to thrive. The USFS should adopt a policy of passive stewardship, allowing nature to manage these forests and thereby aligning with Section 4 of the executive order, which advocates for "Nature-Based Solutions to Tackle Climate Change and Enhance Resilience."

The current Draft Environmental Impact Statement falls short in safeguarding the remaining old-growth forests. To correct this, the final decision should:

- 1) 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 moist forest types.

2) End all commercial use and commercial exchange of old-growth trees.

3) Implement a "no logging" policy for the Tongass National Forest, which stores more carbon than any other National Forest.

Moreover, the DEIS does not provide adequate provisions for revising land and resource management plans to protect mature forests, which could become the next generation of old-growth forests. The mesophytic and southern mixed forests of Regions 8 and 9 in the eastern U.S. should also be included in these protection efforts.

Currently, USFS management strategies, such as slash-and-burn techniques and creating open, "oak-dominated" canopies in response to the "threat" of mesophication, are ecologically disruptive. These methods increase, rather than reduce, forest vulnerability, particularly in deciduous broadleaf forest habitats.

In conclusion, with so little old-growth forest remaining in the United States, we have only a few places left to learn from how nature manages threats. It is our utmost responsibility to treat these natural forces with greater respect than is currently practiced, and to humbly step back, allowing for the passive protection of these unique, irreplaceable wild environments.