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Comments: I urge the US Department of Agriculture and US Department of Interior to work together to soon initiate a rulemaking based on a definition of mature forests and trees as 80 years and older, to permanently end the avoidable loss of their critically important carbon, water and wildlife values to logging. It is extremely disappointing that the agency has ignored public calls to adopt standards for protecting mature trees and forests.

The plan must include clear, specific language to prohibit logging of old growth.

The final plan should end the cutting and selling of old-growth trees on public lands. These forests can be effectively managed without selling or commercially exchanging those trees.

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.

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 all have a moral imperative to act boldly for future generations.

There are logging projects in the pipeline that threaten mature and old-growth trees. There is still a pressing need for the agency to follow through and ensure current projects are re-evaluated to reverse the loss of old-growth.

MY REQUESTS:

1) 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.

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

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

goals.