Data Submitted (UTC 11): 3/4/2023 2:23:37 AM

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Comments: The Programmatic Amendment and Draft Environmental Assessment for Old Growth, Coarse Woody Debris and Soils revisions to the Bitterroot National Forest Plan, is inadequate. It seems to be a further reduction of actual specific standards and part of an ongoing project to basically diminish old growth standards to meaninglessness to allow increased logging in what few areas of old-growth forest we can still get at. Mature forests are essential for carbon sequestration and the mitigation of climate change. The essential part of shaded fuel brakes - is shade. Coarse woody debris feeds soil.

A healthy soil sequesters an incredible amount of carbon, and along with shade retains cool overnight temperature and humidity. The Draft Environmental Assessment needs to be upgraded to an EIS.

Thank You

**Charles Mabbott**