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Comments: As a climate physicist, I thank you for proposing a nationwide forest plan amendment to promote the conservation of old-growth forests. This proposal marks an unprecedented opportunity to safeguard precious and disappearing forests that are essential for preserving biodiversity and combatting climate change. However the details of the forest plan amendment show that it largely is business-as-usual.

Mature and old-growth trees and forests have the very highest carbon sequestration potential on the planet while they grow. Large trees that die and are left standing in forests including those killed by wildfire retain carbon for long periods of time while providing important habitat for countless species of wildlife. Protecting mature forests has the added benefit of improving biodiversity by providing critical habitat for mountain lions, spotted owls, northern goshawks, black bears, and other threatened and endangered plants and wildlife.

Despite the recognition of their importance, however, over 370,000 acres of mature and old-growth forests are currently on the chopping block on federal lands.

While I support the administrations attention to this vital issue, the proposed amendment currently contains massive loopholes that must be closed if we truly want to protect old-growth forests from the eminent threat of commercial logging.

The amendment currently states, Vegetation management within old-growth forest conditions may not be for the primary purpose of growing, tending, harvesting or regeneration of trees for economic reasons. Ecologically appropriate harvest is permitted.

As written, this language will do nothing to prevent the harmful logging that is currently taking place and further proposed within both mature and old-growth forests. The United States Forest Service no longer proposes logging for primarily economic reasons. Rather, every logging project currently proposed for these areas cites ecological reasons as the primary purpose. Many of these logging proposals even disguise the practice of clear cutting as ecologically beneficial on paper.

Clear cutting old-growth forests in no way helps to achieve the conservation goals pronounced by the administration. However, without significant revision to tighten these loopholes, business for the logging industry will continue as usual, even after this amendment is adopted.

Please revise the proposed amendment to ensure that harmful commercial logging practices have no place in old-growth forests. Close the logging loopholes and stop the logging industry from using terms like wildfire mitigation and healthy forest management as a "Trojan horse" for destructive logging. Further, please incorporate protections for mature forests, which are equally important in our mission to preserve biodiversity and combat climate change.