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First name: Robert

Last name: Jeckell

Organization:

Title:

Comments: We should not be selling old-growth trees on public lands. Old-growth forests host unique and irreplaceable characteristics quite different from younger forests. Many animals have evolved to rely partly or entirely on old-growth. Old-growth is peerless at storing and filtering water, providing top-quality recreation, and sequesters far more carbon than younger forests. These are all free services provided by old-growth forests.

Currently some 370,000 acres of mature and old-growth forest on federal lands are vulnerable to logging.

A closer look at the administration's proposed policy language reveals an enormous problem: "Vegetation management within old-growth forests conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons." History has shown time and again that if all that is needed to log old-growth is to omit or downplay "economic" reasons the timber industry will do so. The proposed language would allow over a dozen exceptions to actual protection of old-growth, including "to reduce fuel hazards," "proactive stewardship," or "resiliency." However studies have shown that old-growth stands tend to reduce wildfire spread and intensity, while thinning them dries and heats up the area.

I urge the Forest Service to remove the Tongass National Forest (in Alaska) old-growth logging exemption from any further analysis in the upcoming Environmental Impact Statement.

Mature forests and trees, including their value as future old growth, also must be protected. National forests in certain parts of the country, for example national forests east of the 100th meridian, have virtually no old-growth left. This makes protecting mature forests all the more important.

The final policy should ensure that frontline and nature-deprived communities directly benefit from the amendments, including through the development of an "equity layer" to the Forest Service Climate Risk Viewer, which would demonstrate these benefits across a diverse array of communities.