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Comments: Thank you for starting a process we hope will end with meaningful protections for existing old-growth and mature forests across the U.S.

We should not be selling old-growth trees on public lands, period!

Old-growth forests host unique and irreplaceable characteristics that are 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 sequestering far more carbon than younger forests. These are all free services provided by old-growth forests.

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 repeatedly shown that if the timber industry only needs to omit or downplay "economic" reasons for logging old growth, it will do so; this is devious and unacceptable.

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 results in increased desiccation and elevated temperatures, raising the likelihood and severity of wildfires.

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

Besides old-growth forests, mature forests and trees must also be protected, including their value as future old-growth. 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 be added to the Forest Service Climate Risk Viewer, which would demonstrate these benefits across a diverse array of communities.