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Comments: I support the December 2023 proposed National Forest Plan Amendment to Conserve and Steward Old Growth Forests. The amendment would impact all 128 Forest Plans to restrict logging of old-growth forests and to initiate enhanced stewardship of old-growth forests. Mature and old growth trees are the best storage areas for carbon within the US forest service, and thus deserve conservation as key elements within an array of climate solutions.

I'm fortunate to live in an area of Montana where mature and old-growth forest exists. I've also visited and hiked in old growth forest areas on the Alaska coast which are teeming with biodiversity. Logging old growth not only destroys the trees and their role in carbon sequestration but also diminishes the ability of every other life form in the ecosystem to survive and thrive. Logging old growth has a compounding negative effect on everything else in the ecosystem.

In the high desert area of Montana where I live, the increasingly warmer, dryer climate conditions have made lengthened estimates of the time needed for reforestation. Once mature Douglas fir trees have been logged, reforestation with the same species may take 75+ years to regrow compared to 25 years in Oregon or Washington. Beyond that difference in regrowth, the climate is changing fast enough so that regrowth of certain species may not even be possible in these high, arid environments. For these reasons and others, maintaining mature forests so that they become old growth and maintaining old growth is more valuable to us than logging these forests.

What is old growth? To identify old growth I support this simple, age-based definition for old growth stands.

East of 100th meridian =

- All stands 120 years and older
- No less than the oldest 30% of the Forest's stands, whichever is greater
- All trees 120 years and older

West of 100th meridian =

- All stands 150 years and older
- No less than the oldest 30% of the Forest's stands, whichever is greater
- All trees 150 years and older

In addition to protecting old growth forests, it's equally to also protect mature forests and trees so that they can become old growth with the benefits of old growth forests.

I support stronger old growth protections must be considered in one or more alternatives:

- Eliminating commercial exchange of old growth trees,
- Eliminating logging in old growth where fire is infrequent.
- Eliminating the Tongass National Forest exception.

I appreciate the opportunity to comment on this proposed amendment.