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Comments: Thank you for proposing this amendment to protect old-growth forests from commercial logging. Old growth forests are resilient, having reached this old age. They don't need human manipulation to protect them other than to keep them from being logged. A healthy forest always has some component of death and active dying occurring - saying a healthy forest is one without dead or dying vegetation is a misnomer.

Mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water and shelter wildlife. Logging these trees deprives us of the benefits and beauty of our largest, oldest trees.

The draft proposal can be improved to better protect our national forest lands. Remove logging loopholes that allows agency staff to manage old-growth for "proactive stewardship" reasons. Ambiguous language should be removed that could be used to justify continued commercial logging of old growth forests in the Tongass National Forest.

To better protect older forests, the minimum age to qualify to be old forest should be dropped from 150 to 100 years-old. This would allow currently mature forests to increase the amount of old growth for the future.

Again, thank you for this amendment and I urge you to modify it as recommended above to make it even better.

Jeff Birchem