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Title:

Comments: I am a current and future citizen of this planet who needs you to take action to protect our shared climate. And protecting living Mature Forests is the quickest, most efficient, and easily scalable means. This is why President Biden directed protections for forests - not to optimize timber harvests or achieve some agency definition of a "managed forest".

Right now, old-growth and mature forests are one of the best solutions to the climate crisis. Studies confirm that that mature and old-growth trees provide more cost-effective and efficient carbon capture and sequestration than any scheme that man can build. And in the bargain, they lower ambient temperatures, block the high winds that cause damaging wildfires, filter and retain clean water sources, stabilize soils to prevent erosion, and balance the biodiversity of the complex ecosystem they anchor.

I support Alternative 3 of the proposed Old Growth Amendment for the strongest protections. But I urge additional measures to:

- 1. Expand protections to Include Mature Growth forests and Mature Trees in addition to Old Growth stands. "Old-growth forests represent 18% and mature forest another 45% of all forested land managed by the two agencies." Mature forests far outnumber remaining old-growth in the United States. Continuing the status quo is not enough; we need to set measurable goals to increase old growth by allowing mature growth to continue undisturbed. Grow the Old Growth of tomorrow by protecting Mature Growth NOW.
- 2. Ecological integrity is not defined in these documents and could be dangerously vague. Stand-replacing cuts (clear cuts) in old-growth forest does not contribute to its health, resilience, or conservation nor is it a climate-smart practice. Clarify and solidify the definition of "ecological integrity" to prevent agencies from "redefining" the standards to justify disruptive practices or to give phony "paper results".
- 3. Eliminate "proactive stewardship". Ban "deminimis" logging, prohibit "commercial exchange" of trees, exclude clear-cutting, mechanical thinning, selected harvest and prescribed fire. These are unjustified excuses for profiteering. Human intervention reduces forest health by disrupting the nutritive mulch of the forest floor, trampling new growth, compacting soils, disrupting natural drainage patterns, creating erosion and introducing invasive species. ANY logging alters microclimates by exposing forests to wind, erosion, and invasive species all which increase risks of damaging wildfires. Natural ecosystems do not need human "management"; they evolved to tolerate all intensities of fires and regenerate healthy new forests without our intervention. Humans don't know how to create and manage complex natural ecosystems. Sustainable ecosystem forests are not a crop; they are not replicable in mass.

President Biden's goal is carbon sequestration, not timber profits or better "management". Natural mature forests

provide greater value in climate protection than in extraction for quick profit. Say NO to corporate interests, and start prioritizing our shared climate. Please adopt Alternative 3, but with stronger enhancements to ensure it has the teeth to truly protect and expand old growth forests.