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Organization:

Title:

Comments: Dear National Old-Growth Amendment;

Thank you for including my comments. As a retired forester old growth remains important to me in many ways including the small remaining area of old growth forest immediately upstream of my western Montana home which provides a resilient reservoir of groundwater in the watershed. My quite local old growth forest is a refuge for wildlife and I find solace in the island of habitats there.

Old Growth forest doesn't happen over night or even in a single persons lifetime. It is basically irreplaceable. It provides a refuge and a buffer for the ravages of climate change we are beginning to experience. The rapidly warming and destabilized climate will make old growth forest ever more irreplaceable and endangered. There will be no getting to back to any specific ecology/habitats, only what comes next. What comes next, in any extensively managed forest will inevitably be less biologically diverse, which will be biologically poorer, less resilient, and degraded.

Old Growth Forest is more than any particular diameters and age classes of trees. It is biodiversity over long periods of time ,including wildlife. Many of the criteria currently used as reason for silvicultural treatment of forested areas, old slow growing trees, insects, down woody debris, thickets etc...,are in actually defining characteristics of Old Growth Forest!

Please include the following in the NOGA...

Reinstate Standard 1 - no degradation/impairment of old growth

No loopholes for removing old growth. The DEIS should mandate preservation.

Old growth stands must be removed from calculation of the timber base for purposes of sustainable levels of logging.

The values of mature and old growth forests as wildlife refugia from climate change and for carbon sequestration, and areas of higher humidity and wind buffers must be considered.

thank you

Charles Mabbott