Data Submitted (UTC 11): 9/21/2024 12:12:24 AM First name: Brad Last name: Green Organization: Title:

Comments: First, old growth forests are susceptible to unnatural fire, disease, insects and changing climate conditions - the same factors threatening the entire National Forest System. Harvesting pressure on old growth forests was an issue 50 years ago, but not today. In reality, active stewardship is not a threat; it's how we can save older forests.

Second, "old growth" is not a single condition defined only by the age of trees; it's a set of characteristics that apply differently across 125 forest plans from Alaska to Florida. Forests differ in moisture, elevation and species. Applying local knowledge and expertise to forest management planning is essential. Forests are dynamic collections of equally important age classes, not just "old growth, and everything else." Wildlife habitat, climate resilience, carbon optimization and biodiversity are maximized when many forest ages are interspersed across landscapes. Proactive management is essential.

Third, the intentional misrepresentation of forest management as "logging" by some interests distracts from the latest science and current knowledge on how to conserve forests.

Restoration requires removing some trees that would have been removed by fire - and selectively removing overabundant species to restore species diversity. This form of restoration work is healthy, not harmful.