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Comments: There is no livable future without our old-growth trees, and we must ensure that regulatory measures and their language adequately address the weight of the consequences of losing these necessary trees and the ecosystems they uniquely create. Considering this, the National Old Growth Amendment must include language and enforcement measures that completely halt the cutting and selling of old-growth trees during their life cycle and beyond.

Old-growth trees are scientifically proven to slow accelerating and deadly climate changes that have led to rampant forest fires, unbearable temperatures, and preventable death; they sequester significant amounts of CO₂ compared to other trees, control below-ground growth conditions, emit phytochemicals that are being tested to cure illness, act as symbolic sites of heritage of Indigenous and other communities that require the health and existence of old-growth trees to live, and more. More recently, science has discovered that the ecosystem of old-growth trees may have greater carbon sequestration capabilities than younger trees -- they account for nearly 10% of the trees responsible for making our environments livable (Gilhen-Baker et al., 2022).

Additionally, research has discovered that old-growth trees act as knowledge centers for younger trees -- passing nutrients necessary to combat harmful insects through secreting enzymes and other means. Without old-growth trees, our forests do not have the adequate capabilities to fight off increasing insect infestations that threaten whole ecosystems (Davies, 2021). Moreover, old-growth trees maintain fungi networks vital for overall forest health -- without these fungi and communication networks, younger trees are not as resilient (Gilhen-Baker et al., 2022; Davies, 2021).

Our future generations depend on the Forest Service and local, state, and federal agencies to ensure that old-growth trees are protected from any future logging, even after the death of a tree, as they continue to provide benefits to ecosystems. The National Old Growth Amendment must include language that explicitly restricts future logging of any old-growth trees, including those in Tongass National Forest; the draft correctly removes an explicit Tongass exemption but includes ambiguous language that might be used to justify continued commercial logging of old-growth on the Tongass.

References:

Davies, D. (2021, May 4). Trees talk to each other. "mother tree" ecologist hears lessons for people, too. NPR. <https://www.npr.org/sections/health-shots/2021/05/04/993430007/trees-talk-to-each-other-mother-tree-ecologist-hears-lessons-for-people-too>

Gilhen-Baker, M., Roviello, V., Beresford-Kroeger, D., & Roviello, G. N. (2022). Old growth forests and large old trees as critical organisms connecting ecosystems and human health. A Review. *Environmental Chemistry Letters*, 20(2), 1529-1538. <https://doi.org/10.1007/s10311-021-01372-y>