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Comments: Thank you for the opportunity to comment on the amendment for Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356.

One of the things I most appreciate about the new language is the clear recognition and respect for Indigenous Knowledge and stewardship practices and mandate to include these perspectives in forest management plans.

Within the section 'Standards for Management Actions within Old-Growth Forest Conditions', Standard #3 reads: "Vegetation management within old-growth forest conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons. Ecologically appropriate harvest is permitted in accordance with standards 1 and 2." I

encourage you to strengthen this standard to include a clear definition of "ecologically appropriate harvest". I understand that the Forest Service's overall mandate is a multi-use framework, but at this time, and the intent of this Executive Order and ensuing Amendment, is prioritization of conservation of old and mature forests for the currently more important benefits of carbon sequestration and biodiversity over economic needs that are easily provided by privately held land. Thank you for taking primary purposes for economic reasons off the table, our national forests should never be treated like tree farms.

Overall, I also encourage the Forest Service to include 'mature' forests in these guidelines as well as 'old-growth' because these are the areas in the process of returning to old growth characteristics and will hopefully lead to more areas being conserved by this amendment. I have concern that the Secretary's exclusive use of "old growth conditions" in the amendment may limit the areas recognized for conservation.

Thank you again for this opportunity to comment. Please recognize the incredible importance of old trees in intact forest ecologies to the mitigation of climate threats and do all you can to protect them. I have attached a recent study that shows how important leaving mature forests growing is to our future.

Sincerely,

Elizabeth Bancroft

ATTACHMENT: proforestation paper 2019.pdf Moomaw WR, Masino SA and Faison EK (2019) Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. Front. For. Glob. Change 2:27. doi: 10.3389/ffgc.2019.00027