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Comments: Conserving older forests is critical. However, I am concerned the amendment will add unnecessary bureaucratic delays that hinder the urgent forest health treatments needed to combat wildfires, insect infestations, and disease-threats that have already destroyed nearly 700,000 acres of old-growth forests on federal lands over the last twenty years.

The Forest Service's own analysis confirms that chainsaws and commercial logging aren't the primary threats to old-growth forests.

Instead, the major threats are severe wildfires, insect infestations, and disease. Unfortunately, the proposed amendment adds layers of bureaucracy and red tape, instead of prioritizing active forest management to mitigate these natural threats.

Under the current process, the Forest Service already takes years to implement forest health treatments, which are critical to reducing the risk of catastrophic wildfires. These delays are often made worse when projects are halted by litigation.

The Forest Service's threat assessment highlighted that over 70% of mature and old-growth forests are at high risk of wildfire-caused mortality. This is compounded by the fact that forests in areas reserved from active management, such as wilderness areas, have seen more significant losses of old growth than forests where limited timber harvest is allowed. In contrast, old-growth forests have increased in managed forests.

\* Severe wildfires are the greatest threat to our forests, wildlife, and communities. We need policies to accelerate forest thinning and other management activities.

\* Extra bureaucracy won't save our forests-proactive stewardship will. Empower our public lands managers to do their jobs and care for the forests.

\* Rather than adding more red tape and litigation to the management of our federal forests, individual national forests should focus on implementing the Wildfire Crisis Strategy through their existing forest plans to achieve desired conditions on these landscapes.

\* Fund existing Shared Stewardship and Good Neighbor Authority Agreements with unique public-private partnerships as proposed in the attachment.

ATTACHMENT: FPZ Whitepaper Final--Feb 2023.pdf - Forest Protection Zones-White Paper from Crowbar Research Insights LLC