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Comments: I am submitting the following comments for consideration by the US Forest Service and the Dept of Agriculture on the proposed changes to USFS policies for the protection of old growth forests:

1. I strongly support the intent of the executive order to provide further protection on mature and old growth forests on federal lands. These forests comprise less than one percent of the forest habitats in western NC and should not be destroyed to create "new forest" (a term used by the USFS in the recent Pisgah and Nantahala forest management plans).

2. Any reference to allowing exceptions of harvesting mature or old growth habitats for ecological purposes - as included in some current versions of the policies - should be removed or very carefully clarified. The ecological rationale for cutting these habitats to create "new forests" that was used in the environmental impact statement (EIS) for the Pisgah and Nantahala management plan was weak, at best, and scientifically unjustified. There needs to be flexibility to allow some cutting in mature and old growth habitats but the criteria to allow cutting needs to be very clear - such as to prevent the further spread of disease that would impact a larger area of forest habitats in the region.

Thank you for considering these comments.

Doug Baughman