

Data Submitted (UTC 11): 1/30/2024 9:25:19 PM

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Comments: Thank you for initiating this process to secure the long-term health of old-growth forests. The protection of these critical forests should be a top priority.

As the agency refines its old-growth proposal, I urge you to include the following:

- Undertake on-the-ground identification of old-growth stands to ensure that the proposals plan components are applied to the appropriate places.
- Clarify when proactive management can occur to ensure that management is driven by forest health needs.
- Ensure robust engagement of the public and Tribes in developing local or regional Adaptive Strategies for Old-Forest Conservation.
- Provide adequate resources to support the proposals monitoring requirements so that the efficacy of the management approaches can be assessed and adapted, as needed, to meet the proposals goals.
- Foster data transparency by publicizing information compiled through the National Old-Growth Monitoring Network, as well as information on vegetation management projects occurring either in old-growth stands or in priority fire sheds under the agency's Wildfire Crisis Strategy.

Thank you for recognizing the many important values of old-growth forests through the initiation of this process, and for considering my comments.