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Comments: I want to piggyback off of the comments made by Silvix Resources and the Forest Stewards Guild that recommend a conceptual framework for delineating old and mature forests:

*Old growth forests that need little to no intervention for protection.

*Old growth forests that need management to survive.

*Mature forests that need little to no intervention to develop old forest characteristics.

*Mature forests that need management to develop old forest characteristics.

*Mature forests managed for other conditions (e.g., young forest conditions or timber).

This framework establishes a poorly understood fact (but widely acceptable in the scientific community) that not all old-growth forests are equal, whether from side of the country to the other, within the same region, or even within the same landscape. Our foresters and land managers must have the flexibility to treat and manage individual examples of mature and old-growth forests on a case-by-case basis, within the existing parameters of the NEPA process, rather than dictate stringent parameters for all situations.