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Title:

Comments: I applaud the USFS efforts to inventory and protect old growth forests and identify areas of mature forests that can be managed in a manner that does not degrade or impair their ability to become the ancient forests of the future. Many years ago during the "timber wars" I did "ground truthing" in areas proposed for timber sales and found it very useful to have definitional guidelines for what constitutes old growth. Realizing that there are many kinds of forests and that the Old Growth Conservation Amendment covers them all, I hope there will be opportunities for the various regions to develop such guidelines for each region so that there will be a basic agreement on what constitutes "old growth" and "mature forests."

My major concern is that fear of wildfire has often led to fire prevention strategies that are in fact neither necessary nor effective. The "adaptive strategy" of "thinning" a designated area does not guarantee that the area will or will not burn, and it is extremely difficult to predict (for example) where lighting will strike. I would strongly urge that fire prevention strategies be focused in areas of urban/wildland interface only and that emphasis be placed on fire-hardening of structures and thinning of vegetation in those areas and NOT in forested areas distant from urban/wildland interface.

It is heartening, however, that USFS has recognized the necessity of preservation of remaining old growth and improving conditions for mature forests. Having worked for many years on volunteer trail crews and doing solitude monitoring for USFS in the Pacific NW, I know you are underfunded and understaffed, so I urge you to involve citizens in monitoring efforts. Many of us will do whatever we can to preserve and protect the forests that are so necessary for clean air and clean water, especially as we (unfortunately) need to adapt to climate change, as we don't seem willing to take steps to prevent it.

Thank you for your work and for the opportunity to comment.