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First name: Robin

Last name: Nicholoff

Organization:

Title:

Comments: Thank you for initiating this process to secure the long-term health of old-growth forests. Although these important forests provide numerous benefits to people and to nature, they are present on only a fraction of the landscape they once covered. This reality, along with the increasing stressors that these forests face from climate change as well as pressures to harvest large trees, highlights the need and urgency for national direction to secure the conservation and health of our remaining old-growth forests.

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

- Identify species of concern that may inhabit particular old growth stands.
- Identify and protect from harvesting younger stands that will become old growth stands in the future.
- 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. In most cases no management should occur in old growth stands.
- 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.