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Comments: Old growth forests provide many benefits to people and to nature, and are essential habitat for numerous wildlife species. Only a small fraction of our original old growth forests remain in existence. This alone would be reason to strongly protect the remaining old growth forests - but now we must consider the additional threats from climate change.

Conservation of our remaining old growth forests is now an urgent matter.

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