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Comments: Hello Federal Land Managers,

I support the stewarding and developing older forest conditions across the US Forest system. I urge you to keep all tools available to your local land managers to implement this policy. You cannot know or foresee all the future stressors that may impact individual trees or forest stands that contain these traits. Please empower and support your Forest Supervisors and District Rangers to develop and implement the appropriate site-specific prescriptions to steward these landscapes.

I'll provide a contemporary example of the hazards of placing administrative restrictions on your land managers that is challenging their ability to steward older trees and older forest structure. A drought and subsequent bark beetle epidemic in California's Sierra Nevada overlapped with the range of giant sequoia (*Sequoiadendron giganteum*). This killed many mature pine and fir that may be covered by your policy. These mature, but very dead trees, have since changed the fire hazard both within and in forests adjacent to the giant sequoia groves. Subsequent fires have led to high levels of old growth giant sequoia trees, with high impacts on several groves. Post fire, the stressed, dying, and dead giant sequoias are supporting an outbreak of cedar bark beetles (*Phloeosinus* spp.) that may be causing further mortality or decline of trees that have survived the fire.

I provide this as an example of where administrative or cultural barriers to removing (salvage logging) dead and dying mature pine and fir trees led to direct impacts to an iconic species with a very limited range. Placing additional barriers in front of your local land managers to care for their small part of the federal estate would be short sighted.

As you enact these policies please remember that you have a team of devoted and capable resource professionals dedicated to stewarding federal forestlands. Please set broad objectives for stewarding and developing older forest structure then focus on providing your local land managers the tools, resources, and support to make site-specific decisions based on their informed knowledge of the broad ecosystems of which they steward.

Thank you for considering this comment.

Kevin Conway

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