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Comments: It is commendable that the Biden administration is addressing the need to protect old-growth forests- an essential step in combating the twin crises of species extinction and global warming. Unfortunately, log truck-size loopholes remain in the plan. Its numerous exceptions would render the new approach ineffective. For example, old-growth logging would be allowed so long as "economic" reasons were not cited by loggers as the primary justification! Loggers will know perfectly well how to game this system! And the protection of "mature" forests, which would become the next generation of old-growth, is not addressed at all in the proposal. Once again, we have a proposal to promote old-growth forests by - cutting them down!