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Comments: The primary threats to old growth forests aren't chainsaws or commercial logging, as the Forest Service's own analysis confirms.

Instead, the major threats are severe wildfires, insect infestations, and disease. Unfortunately, the proposed amendment adds layers of bureaucracy and red tape, instead of prioritizing active forest management to mitigate these natural threats.

Under the current process, it already takes years for the Forest Service to implement forest health treatments, which are critical to reducing the risk of catastrophic wildfires. These delays are often made worse when projects are halted by litigation.

The Forest Service's threat assessment highlighted that over 70% of mature and old growth forests are at high risk of wildfire-caused mortality. This is compounded by the fact that forests in areas reserved from active management, such as wilderness areas, have seen greater losses of old growth than forests where limited timber harvest is allowed. In contrast, old growth forests have actually increased on managed forests.