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First name: Margaret Last name: Goodwin Organization: N/A

Title:

Comments: The Forest Service's own analysis shows that the primary threats to old growth forests are severe wildfires, insect infestations, and disease, not logging.

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 proposed amendment adds even more layers of bureaucracy and red tape instead of prioritizing active forest management to mitigate these natural threats.

The Forest Service's threat assessment highlighted that over 70% of mature and old growth forests are at high risk of wildfire-caused mortality. 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. Severe wildfires are the greatest threat to our forests, wildlife and communities. We need policies to accelerate forest thinning and other management activities.

Extra bureaucracy won't save our forests-proactive stewardship will. Empower our public lands managers to do their jobs and take care of the forests. Rather than adding more red tape and litigation to the management of our federal forests, individual national forests should focus on implementing the Wildfire Crisis Strategy through their existing forest plans to achieve desired conditions on these landscapes.