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Comments: While I do support the Draft Amendments vision of a system of resilient old-growth in principle. The current Draft Amendment would fail to achieve that vision:

- 1. The Desired Conditions should include language about increasing the amount of old-growth forests across the National Forest System since there is a deficit of old-growth currently on the landscape.
- 2. Currently the plan does not consider an alternative that would require conservation of mature forests, or a portion of mature forests. I believe the Final Environmental Impact Statement should include an alternative that looks at conserving at least some portion of existing mature forests.

Proactive stewardship of all old-growth forest types is inappropriate. The amendment language should be changed to acknowledge that some old-growth forests, like those west of the cascades, should be passively managed. In other words, leave old-growth west of the cascade crest alone.

3. The standards as currently written in the preferred alternative Standard 2c. allow for too many inappropriate exceptions that could lead to meaningful loss of old-growth forests. While exceptions for tribal use are appropriate, all of the others should be removed from the plan.