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First name: Malcolm

Last name: U. of Arkansas at Fayetteville

Organization:

Title:

Comments: I have a doctorate in geosciences specializing in dendroclimatology reconstructing past climate. I have published in Science, Nature and other journals. The USFS has been derelict in protecting old growth, e.g., providing a chainsaw to cut one of the oldest bristlecone pines. There are too many loopholes where old growth can be cut, even reduced to wood pellets to be burned. Restoration of old growth must be prioritized, which NOGA does not adequately do.