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Comments: Having done volunteer trail work in six western states over 30 years, I appreciate the variety of forest types and the scope of your task in arriving at a national plan. I'm also aware that old growth forests offer the best carbon sequestration and are most fire resistant, AND we have eliminated too many of them. Thus it is CRUCIAL to protect the remaining old growth as well as mature forests that will provide the next old growth generation. I applaud USFS efforts to set standards and benchmarks for conservation and stewardship and agree with the preferred alternative. What follows are suggestions to strengthen that choice.

Please reinstate Standard 1 from the NOI to make absolutely clear that management activities "must not degrade or impair" old growth forests. This phrase is NOT redundant. It provides a crucial guardrail for protective proactive management of old growth forests. This could be strengthened further by clarification that only younger trees may be cut/removed from old growth stands.

Because there is currently no protection for maturing forests, it will be important to clarify guidelines for identifying and stewarding such forests. Including adaptive strategies for each unit, if done thoroughly, may take more than two years. Current management emphasis is on intervention, but restraint is also crucial. For example, moist forest types in the Pacific NW don't need the kind of preventive thinning that might be used elsewhere. The old growth forests we currently value managed to survive as healthy stands without management intervention. So I would encourage placing equal emphasis on passive stewardship and proactive work.

My final concern is that some exceptions to standards are too broad. In particular the section in 2(b) that allows for "incidental activity" is so broad and poorly defined that it almost defeats the purpose of protection. While I would love to be able to reroute a blocked trail without doing an EIS, I can envision a number of incidental activities that might damage habitat connectivity and watershed health. Without clearer guidance as to what "incidentals" are permissible, this could open a door to undermining the entire plan.

Thank you for your work and for considering these comments.