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Comments: While the stated goals within the DEIS represent a strategy long needed for the national forests system, the current policy as written must be strengthened in order to meet these goals.

Instead of setting an arbitrary target # of proactive stewardship projects in order to show progress toward compliance, each national forest, or groups of national forests that share eco-regions, should work with their communities, tribes and stakeholders to identify targets for old-growth in the next 3 years. This target setting should incorporate considerations for connectivity and resilience. A target should be set for each decade succeeding this amendment, and mandatory progress should follow, along with monitoring and reporting. Each forest type where the concept of old-growth is relevant should contribute to this target based on estimates of historical and future range of variability. Old-growth should then be recruited and retained within these forest types to meet this target via proactive stewardship, where needed.

Adjacent stands that are not old-growth should play a critical role in contributing to the resilience, redundancy and connectivity of old-growth stands. And more intensive proactive stewardship that may be necessary should primarily occur here.

As proposed, proactive stewardship may potentially cause a stand to no longer meet old-growth criteria. This loophole poses a potential threat as the protective measures of the amendment seemingly only apply to old-growth stands that meet minimum criteria. The intent should be clarified and no net loss of old-growth stands, as it relates to their qualifications for protection under this amendment, should occur due to proactive stewardship activities.

Each national forest should create a webpage on their website that relates to old-growth on the forest, including estimates of how much historically existed, how much currently exists, where appropriate visitable examples exists (including access roads, trails, water trails, and campgrounds), threats to old-growth specific to the forest, how old-growth is managed on the forest, and the decadal targets set for future old-growth including a list of sites to visit to see this progress.

Thank you for this undertaking and for addressing these important issues.