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Comments: I am very pleased to see the USFS putting such effort into the future of mature and old growth forests. I am especially pleased to see the inclusion of indigenous perspectives in the plans for managing the forests. Native people have long understood the value of preserving our forests while using their resources wisely. Canadian provinces which saw terrible forest fires in the last two years have come to recognize the need for a return to Native forest management practices if the forests are to survive. The Menominee people of Wisconsin provide an outstanding role model for forest management that meets multiple needs.

As a resident of New England, my particular interest is on recruitment strategies. It is well understood that mature and old growth forests are critical to climate change mitigation - in many respects, the older the forest, the better. In addition to carbon sequestration, old growth forests do a better job of retaining water and mitigating against periods of drought. The province of Nova Scotia had two ferocious wildfires last year which grew fast and burned hot in part because the ground was so dry. New England is not immune from similar forces as our winter snow pack shrinks and drought becomes more common here.

Only about 4% of New England forests are considered old growth. It is imperative to find some way to increase that percentage. As part of that effort, I would like the proposal to include the following:

- * Reinstate the standard which prevents degrading or impairing old growth forests
- * Add passive management to the definition of proactive stewardship, as an appropriate part of such stewardship
- * Remove the language in Standard 2B which provides an exception for individual management activity
- * Modify Guideline 3 to recognize the value of old trees in young stands of trees - if we don't protect those old trees, then here in New England, we will never have mature or old growth forests

Many thanks for your attention to this important issue and for taking comments from the public for consideration.