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Comments: In particular, "incidental" needs definition in proposed new Standard 2b, which would otherwise allow undefined "incidental" cutting or removal of trees in old-growth forest.

Likewise, proposed new exception iv in new Standard 2c would allow "incidental tree-cutting or removal [hellip] for de minimis use for local community purposes." However, on this proposal, the "de minimis" exception should be deleted entirely. It too is undefined, but unlike "incidental," "de minimis" is inherently incapable of definition, it is so broadly stated.

Finally, a Standard should be restored that is no longer in the Forest Service plan, called the "non-degradation Standard."

Thank you.