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Comments: I am concerned about exceptions within the new management guidelines in which forest managers may alter old-growth habitats or remove trees under the guise of stewardship goals and other vague situations. The proposed plan instead should explicitly stop logging in old-growth forests and limit all habitat management activities unless those activities will actually enhance the old-growth conditions with regard to its region of the country.

Plans for protection of old-growth forests need to acknowledge the environmental pressures that invasive plants, animals, and pathogens now exert on all of our forests. Active management practices such as understory thinning and prescribed fire create ripe conditions for non-native invasive species to get a foothold. Intact, diverse old-growth forests are naturally more resilient to these and other stressors.

This is a pivotal time for our nation's forests. I am calling on the USFS to protect both mature and old-growth forests, focusing on keeping them as resilient as possible in the face of climate change, non-native invasive species, and biodiversity loss.