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Comments: I strongly support and greatly appreciate this proposed action to amend forest plans to increase protection for old growth forests. This work is extremely important and should be completed no later than early January of 2025. When implemented, the stronger plan amendments should provide major benefits in responding to the worsening climate and extinction crises. Protecting old growth forest stores massive amounts of carbon and provides indispensable habitats for many ESA listed and other special status species. I reviewed and fully agree with everything written in the Federal Register notice.

My concern relates to how the often regressive Forest Service management culture, especially at the forest supervisor and district ranger levels, may undermine the actual implementation of these forest plan amendments. The prevailing management culture can have great influence over how or whether new policies and decisions are applied in the real world. In light of this realistic concern, the Forest Service should explore more effective ways to hold management accountable. For example, could managers performance evaluations be linked to their progress or lack thereof in implementing the new plan amendments? Could there be independent audits of some management decisions to confirm compliance? Could a public hotline or web site be established where the public could report alleged violations? In short, how can the Forest Service ensure that its management culture is helping rather than hindering the implementation of these worthwhile plan amendments?

Before retirement, I worked for BLM for 15 years. I know how federal agency management cultures work. I believe that some of the cultural problems that I experienced at BLM are likely also occurring within the Forest Service. Please review the attachment with more detail on the BLM problems and some recommended solutions. This information may provide some relevant suggestions for the Forest Service.

I wish the Forest Service every success with this incredibly important work.

Thank you very much for considering my comments and the attachment.

ATTACHMENT: BLM Needed Reforms - Richard Spotts 8/20/2021 letter to BLM