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Organization: BY AND FOR THE PEOPLE

Title: President

Comments: RE; Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

(as per request, public comment Submission 1 of 2)

To whom it may concern, Thank you for taking the time to understand my concerns regarding a topic you may have never heard of that will be a part of this public land management decision.

As a Note, my experience in past environmental impact statements related to "public commenting" periods regarding "public land management decisions" and my requests to have Biotechnology included in the EIS over the past ten years is that the NEPA projects are closed before the topic is addressed[hellip] However, now that the New NEPA Act has been implemented (on Jan 1st), I am curious to see how this response is acknowledged[hellip]

Additionally, supporting information will be hyperlinked below the "quote" to validate my concerns.

Once you understand the recent "proposed Rules" of USDA APHIS

"Proposed Exemptions: Movement of Organisms Modified or Produced through Genetic Engineering".

There are only two places to reference the details of the "science" being exempted, and there is no news on this subject that APHIS or I publicly know of!

<https://www.regulations.gov/document/APHIS-2023-0022-0001>

And at the 2023 Stakeholders Meeting, time 35:20'ish in this video,

<https://www.youtube.com/watch?v=AuNGzNxts28>

These "proposed Exemptions" are additions to previously allowed "exemptions" from 2022, allowing techniques to produce genetic editing experiments without public record keeping or labeling. These seeds are supplied to public lands through NGOs' "restoration efforts" and "national seed programs." I have found that this information is primarily unknown to the agency's personnel who utilize these seeds.

Please see this "USDA Science and Research Strategy, 2023-2026: Cultivating Scientific Innovation," which overviews the efforts and includes parts of the forestry plans.

<https://www.usda.gov/sites/default/files/documents/usda-science-research-strategy.pdf>

I have more information to showcase and better explain this topic, and I will submit an additional comment by the end of this commenting period, September 20th, 2024

I will quickly list just a few concerning NEPA developments regarding biotechnology that can be released in public lands as written in the New NEPA Act that with USDA APHIS "proposed rules" should be available to the public as supporting information.

In the new NEPA rules, The public is NOT eligible to comment on "science" related decisions that APHIS is "exempting." and US forest will use. This is an article that abbreviates my concerns.

"the official can prepare a categorical exclusion (CE), which exempts the action from most analysis and public comment requirements (see reference 16). - Over 80% of USFS actions are processed as CEs (see reference 11.)"

<https://www.nature.com/articles/s41893-023-01218-1#ref-CR16>

The new NEPA act, HPCs (Habitat Conservation Plans), and ITPs (Incidental Take Permits), shows how the "applicant" can be "anonymous" and how they are issued by "consulting with self" and are not liable for their actions if "unintended consequence" arises and the "no surprise clause." is extremely reckless. This educational video does a good job of quickly overviewing "Section 10" of the NEW NEPA 1:07:48 to 1:15:00

<https://www.youtube.com/watch?v=6f9npmO-fCM>

The NEPA validates that issues will arise. (high risk, high reward) mentality that the public should be aware of before being applied.

These impacting forces of USDA APHIS and the new NEPA act must be part of your outreach efforts for this request for "public comment." Without connecting these listed federal efforts, the public won't have a true understanding of the intentions that will ultimately be a part of these Land management practices[hellip] It is deceitful to hide these details.

All the efforts are handed down from recent Executive Orders;

Executive Order on Advancing Biotechnology and Biomanufacturing Innovation for a Sustainable, Safe, and Secure American Bioeconomy

<https://www.whitehouse.gov/briefing-room/presidential-actions/2022/09/12/executive-order-on-advancing-biotechnology-and-biomanufacturing-innovation-for-a-sustainable-safe-and-secure-american-bioeconomy/>

Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies

<https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/22/executive-order-on-strengthening-the-nations-forests-communities-and-local-economies/>

Executive Order on Tackling the Climate Crisis at Home and Abroad

<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>