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First name: Darren

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Organization:

Title:

Comments: Dear Sirs,

I'm writing about requests for comment. I understand the reason for President Biden's recent executive order and though well meaning I believe it misses the mark. First, effectively inventorying the forest in a meaningful way within the short time frame given will lead to errors as this will largely be an "office" exercise in order to come up with an estimate of the current inventory of Old growth trees. Much of the old growth inventory has been impacted by insects, disease and fire over the last decade. Again, I think this will be a great source of error in your estimates. In addition, there is no effective definition of "old growth" that I can think of that fits all species. If we are trying to solve the problem on paper by defining it alone, I believe you will miss the mark of your goal. That is to manage and maintain forests with old growth characteristics over time. This exercise currently underway will only lead to further gridlock that limits your agencies' ability to effectively manage the forest. Furthermore, I think the effort to define and describe "old growth" will ultimately lead to less management of the forest that we so desperately need to maintain for a variety of reasons such as wildlife habitat, water quality and quantity, carbon sequestration, and wood products. I have personally witnessed the rapid decline of our federal forests in the west over the last decade. I urge you to rethink this effort and look to professional foresters for input. We cannot afford to lose our forests in this critical time of climate change. Thank you for this opportunity to comment on your effort.

Sincerely,

Darren Mahr

Forester