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Comments: The proposed approach to old growth forests is flawed in several ways:

1. It relies on data that is not up-to-date
2. It is top-down control from Washington D.C. that does not recognize unique local issues or on the ground conditions. Computers cannot yet observe reality. Reliance on a computer-generated single plan for all old growth forests is ignorance or arrogance.
3. It does not provide local decision and control. You cannot fight a fire from Washington D.C. but you keep trying to make judgments that affect old growth losses to fire.
4. It fails to recognize that fire is a natural occurrence in old growth but since fire suppression has been in force, dead fall and accumulation of ladder brush have made what in the past would have been small fires into devastation. Forest undergrowth management should be forest wide not limited to wildlife urban interface areas.
5. It ignores the benefit to forest of animal grazing that helps keep brush and dry grass under control. Cows are not known to start fires. Targeting grazing targets rural ranches and small businesses in favor of fake beef containing massive amounts of chemicals and fungus grown artificial hemoglobin that have not been sufficiently studied.
6. It takes multi-use areas into closed areas as if the government wanted to remove citizens from the forests entirely. The continued efforts to change multi-use lands owned by the people of the United States is a travesty.
7. PILT payments do not make up for destroying the lives of citizens, companies and communities in rural areas that were in place well before many of our national forests were even in place. Since the government central planning, old growth forests have declined not grown.

For all these reasons, the central control and a single plan from Washington D.C. is flawed. It is time the government turned control of the forests over to their managers that reside near the actual forest. Allow them to determine the needs without advising them and see if our forests can be turned around. All you are likely to gain, by sticking with your approach, is another 500,000 acres or more of old growth, and soon to be old growth, as we have lost in the last couple of decades. It is time to realize the limitations of central forest planning. Failure to tell the President that the problem is better handled by local forest managers is why this problem has occurred in the first place. Please examine your own failures and egos to move forward. Doing the same central approach again and again and again and expecting a better outcome is, at the least, arrogance.