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First name: Michael

Last name: Lee

Organization:

Title:

Comments: I applaud the Forest Service for this initiative to increase protection for mature and old growth forests. As a forest ecologist with extensive field experience the past 30 years in Minnesota I can confirm that this initiative is long overdue. A large percentage of federal forest acreage in Minnesota that warrants protection under this initiative is presently unprotected. Current protection under federal old growth designations is primarily limited to native pine types in Minnesota, and only a minor portion of that old pine forest acreage is thus designated. Other forest types have not been included in Forest Service old growth rules in Minnesota. Lowland black spruce (poor, rich), upland black spruce-jack pine feather moss, northern white cedar (upland and lowland), northern hardwoods (sugar maple-yellow birch), and black ash should also be included in old growth forest protection/ management rules. It should be noted that a significant portion of the federal old forest acreage that is not designated under old growth rules occurs in the Boundary Waters Canoe Area Wilderness. And though the Wilderness designation does currently protect these forests from logging, the lack of official old growth designation and tracking them as old growth does not allow a proper accounting of the amount of old forest acreage protected on federal land. Outside the wilderness most of this old forest acreage receives no little or no protection from timber harvest. I have personally witnessed areas on Forest Service lands where logging has occurred in native stands where trees were 150-200+ years old. To be clear, young and immature forests are an important part of the landscape in Minnesota, but we have an abundance of young forest acreage and there is little danger that will change as forest management for timber and paper products combined with wildfires and wind storms will continue to shape the landscape into the future.