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Comments: I have been visiting and studying forests in different states of the USA and around the world for almost 50 years, as I am an exporter and importer of wood products of many different Species. Early in my career I founded New Age Wood Harvesting in western New York, a timber stand improvement company. We approached forest management by treating it as a garden to grow more trees of value to wildlife habitat and to each individual landowner. Tending a garden means promoting the growth of the plants and trees we want, and removing those we don't. I have visited and studied many countries forest areas such as in Russia, west Africa, South America, and in Europe (France, Germany, Ukraine) and found that each forest environment requires different and specialized harvest plans.

There have been many positive changes in wood harvesting due to scientific advances and common sense approaches in these last decades, and some facts have clearly emerged time over time. The greatest of these is that forests in different locations with different environments, different climates with different landowners objectives, grow differently. Land managers who develop specialized plans for each forest land area are dramatically more successful to grow more trees of the right value that benefit wildlife, carbon storage and value for each independent landowner.

Land managers who create one size fits all plans, almost always fail. This is clearly visible in the Amazon rainforest, in Russia/Ukraine and in west Africa, where "one size fits all" harvesting has taken place over millions of acres, to it's detriment.

Therefore I oppose the amendment of the National Forest Plans on such as fast timetable. A "one size fits all" approach to wrongly define "old growth forests" that severely limits Best Management forest harvesting for each individual site, will degrade forest health overall.

The reason that US forests are so prolific, is due to the many hundreds of thousands of private landowners making localized forest management plans that meet a broad range of common sense goals that each landowner has. In short, they treat their forests as a garden, regularly harvesting invasive and unproductive trees, and promoting the growth of trees of value for multiple beneficiaries such as wildlife and for timber value.

Furthermore, the premise of "old growth forests" is a myth. Each different forest area has a different history, but almost all forest lands have been harvested already even if 125 years ago.

Promoting forest health means harvesting it like a garden, not strongly limiting harvesting as this program seeks to do. What garden that is not tended to on a regular basis efficiently grows what was intended? Untended gardens grow weeds, attract devastating insects and fungus, and generally devolve into a wasted area. Untended forests become an insect infested area that kills the trees which releases carbon, and a fire risk that suddenly and dramatically release billions of tons of CO2 into the atmosphere, and destroy wildlife habitat.

Finally, the use of wood products that come from managed forests become in themselves, a carbon sink. Every building using wood, every piece of wood furniture, every wood floor, kitchen, door, etc., is sequestering carbon for as long as it's in use. The broad range of community based forest product companies throughout the USA produce these carbon sequestering products, and generate billions of dollars of economic benefit, and pay taxes.

This proposed program has all of the ingredients to destroy forests, not promote their growth.