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Comments: The top down approach to amend 128 forest plans simultaneously to include consistent direction to conserve and steward existing and recruit future old growth forest conditions would result in a laissez faire approach of forest management harming rural forest - based communities that rely on these forests for good paying jobs and economic stability. The threat analysis that was completed by the Forest Service shows that the major threats to the old growth structure across the United States are insects, disease, and fire. The proposed amendment creates an additional barrier to the proper management of the national forest system. Old growth is currently defined by individual forest plans and already has extensive plan directions across 128 national forests. The proposed amendment does not replace any of these old growth standards and guidelines but is an addition to the current forest plans objectives for old growth . Creating additional national components and unnecessary complexity to all forest plans that will hinder the ability of the USDA to plan and execute efficient project planning and could create contradictory plan components. If the Forest Service continues with this amendment, they should rescind all other standards and guidelines so that they do not create a contradictory system whereby by following one objective violates another.