Data Submitted (UTC 11): 10/14/2024 7:22:49 PM First name: Peter Last name: Warner Organization: Title:

Comments: Numerous studies on the effects of plant genome modifications have demonstrated the potential for deleterious ecological, environmental health, and human health effects. No one has sufficient knowledge of the intricacies of individual species' ecologies, nor of the vast array of potential negative impacts on ecological structure, constituency, and function, resulting from the introduction of novel alleles into evolutionarily selected, long established and ecologically compatible species' genomes. To say and act otherwise is in clear defiance of existing science, and an ignorant, myopic, anthropocentric approach to forest management based upon political, commercial, and industrial motivations. Such severe miscalculations and narrowly, ethically questionable motivations have repercussions that will long persist as ecological dysfunction and deterioration.

On the other hand, the incorporation of forest and vegetation management with ancestral cultural knowledge in silviculture is long overdue. Public land management responses to climate change over the past several decades has run a gamut from incorporating specifically designed prescription burning, based upon local ecological knowledge and science, to rapacious actions towards achieving fire reduction objectives, implemented as ecologically broad policies that have demonstrably increased fire risk and severity in many ecosystems. Local management practices generally reflect locally applicable ecological function and goals, whereas broad policies aiming to fund de-forestation projects are ecologically ill-equipped towards local constituencies and sustaining forest diversity and functions, such as repositories of global carbon. Logging, for instance, yields a net loss of carbon to the atmosphere under most broad management programs, these aimed more at recovery of federal funds, then re-directed (as leases to harvest a publicly owned "resource" -- resources with many values outside the realm of capitalistic profits) towards private corporate financial benefits, instead of sustaining ecological integrity, composition, structure, and function.

In summary, current forest management policies have largely exacerbated timber and other species' losses, and have drastically altered ecosystems to the detriment of any positive effects towards addressing climate alterations and related issues (hydrology, soil ecology, biological diversity, et al.). Forest management policies in silviculture, timber harvest, infrastructure, conservation, recreation, and other elements must be designed and implemented at local scales, reflective of local forest composition and ecology, not in uniformly broad-scale applications, or even as broadly permissive, regionally based management schemes. Sustaining forest health and addressing urgent management issues related to climate alterations and potential rehabilitative management alternatives should not start with, nor focus upon concerns for economic viability, but instead on sound ecological principles and the knowledge inherent in the forests and their inhabitants.