



# SIERRA PACIFIC INDUSTRIES

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The following are Sierra Pacific Industries – Anderson Sawmill Division comments for the Forest Service’s proposed amendment to 128 national forest land management plans to protect old growth.

The Forest Service should reconsider the current proposal of amending 128 Land Management Plans through a single Environmental Impact Statement that was developed in less than a year. The Forest Service must use local engagement and public participation to help develop land management plans. Put trust into those at the Regional and local forest levels who are aware of the unique geographical and ecological areas that they manage, recreate in and live adjacent to. The Forest Service, and the public, would be better served through individual plan revisions and amendments at the Regional and forest levels, rather than a top-down directive from Washington, D.C.

The Forest Service has found that the most significant treat to old growth is wildfire, insects, and disease. Having grown up recreating in the forests of Northern California and working in them as a Procurement Forester, I have seen firsthand the devastation that wildfire can cause. I remember several of the old growth stands that have been burned were overstocked, had fire excluded from them, and were showing signs of drought related mortality. These stands all needed some sort of management. It was too late for many old growth forests that I remember, but there is time to protect the old growth that is left. So, any national forest amendment process for old growth should focus on increasing science-based, active forest management to address our wildfire crisis, and to make our forests healthier and more resilient. Any final amendment must provide clear direction and specific recommendations for active forest management within and adjacent to existing old growth stands to protect them from these threats.

The Forest Service has set an ambitious goal of expanding active management to reduce the threat of wildfire through its Wildfire Crisis Strategy. The agency should publicly document and clarify how this national amendment will assist the agency in achieving its Wildfire Crisis Strategy Goals. While the NOI mentions the need to reduce fuel loads near communities and the Wildland Urban Interface (WUI), most wildfires ignite and spread in the backcountry directly threatening old growth forests. This requires the Forest Service to focus on forest health and wildfire resiliency across the landscape and on the most fire-prone areas. When wildfires start, the objective is to protect life, property, and resources, in that order. If the Forest Service were to increase the amount of forest health projects being implemented across the landscape, not solely concentrated in the WUI, the effect of catastrophic wildfire would be greatly reduced. If Forest Health is returned to old growth stands, natural fire will play a beneficial role in the management of them, rather than destroying an ecosystem in its entirety.

The Forest Service should not lose our national forests for the trees and instead focus on overall sustainable forest management and forest health. Protecting old growth forests requires action. We urge the Forest Service to describe and recommend, in detail, what specific actions it must take to achieve the agency’s stated goals.

Sincerely,

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