



SOUTHEASTERN WOOD PRODUCERS ASSOCIATION, INC.

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January 26, 2024

Director - Ecosystem Management Coordination
Mailstop 1108
201 14th Street SW
Washington, DC 20250-1124

RE: Notice of Intent to Amend 128 Forest Plans for Old Growth: December 20, 2023,
Federal Register Vol. 88, No. 243 88042 -88048

Submitted electronically at: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

Dear Sir or Madam:

The Southeastern Wood Producers Association, Inc. (SWPA) is a dual state trade association that represents the interests of hundreds of loggers and log truck drivers in Florida and Georgia. We have broad member representation from small businesses with just a single employee to larger businesses employing more than 100 employees in rural communities throughout each state. We have reviewed the Notice of Intent to Amend 128 Forest Plans for Old Growth: December 20, 2023, Federal Register Vol. 88, No. 243 88042 -88048 and offer the following public comments.

The SWPA appreciates the opportunity to provide comments on the Notice of Intent on Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System and the agency's proposal to amend 128 forest plans.

The SWPA urges the US Forest Service to reconsider its current proposal and to adopt a full administrative review that allows for objections to the Forest Service's decisions. The objection process is a critically important process which allows the public to fully interact with the decision and propose important amendments/changes that create a better solution at the local forest plan level.

The NOI is an unprecedented effort to impose desired future conditions, standards, and guidelines onto landscapes that differ so greatly that they have over 200 definitions of what old growth is, as well as over 2700 current provisions that dictate how the Forest Service manages old growth. This is an indication of the variability of old forest systems across the country and shows how a national-driven process is not appropriate to address the management of these systems at a local level.

This top-down amendment using the 2012 planning rule is missing a main component of the rule, which is extensive public engagement at the local level. We are also concerned that this planning effort is on an expedited timeline that will not fully analyze the effects on the current efforts to manage the national forest system to reduce the impacts of wildfire, insects, and disease.

www.swpa.ag

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Executive Director

If the Forest Service were sincere in working towards the conservation of old growth, it would reduce barriers to management and treatments that have been proven to lessen the impacts of the true threats that these forests face, such as disease, insects, and wildfires.

Forest Service lands are quickly becoming carbon sources, not carbon sinks, releasing more CO2 into the atmosphere than storing. A broad policy that leads to old-growth and mature forest lands reservation, or protection would only perpetuate the already insurmountable forest health crisis on national forest lands in the decades to come.

Sincerely,

Michael Beardsley
Executive Director