



ASSOCIATED CALIFORNIA LOGGERS

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January 30, 2024

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124
Subject: Comments on Old Growth Sustainability

Dear Director:

Associated California Loggers (ACL) is a non-profit trade association with 500 members that employ over 5000 people whose livelihood depend on sustainably managed forests. Founded in 1973, ACL members have extensive experience and knowledge of the forests of California.

On behalf of ACL membership, we are pleased to submit comments on the Forest Service's proposed amendment to 128 national forest land management plans to protect old growth. The Forest Service should take advantage of this opportunity to increase the pace and scale of active management to improve forest health and resiliency to wildfire, insects, and disease that are responsible for the loss of millions of acres of mature and old growth on our national forests

It is no surprise that the decisions made over the past 40 years to set-aside hundreds of thousand of acres in late seral reserves to protect the Northern Spotted Owl and drastically reduced forest management activities on National Forest System Lands have resulted in a decline in forest health and a significant loss of old growth forest stands to catastrophic mega forest fires. 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 that relies on mechanical treatments coupled with prescribed burning on lands adjacent to existing old growth stands to protect them from these threats.

ACL recommends a serious look at the provisions in the National Forest Management Act (NFMA) and the subsequent amendments after enactment in 1976. Over the past 40 years, the agency has shifted away from the spirit and purpose of the law - to manage our National Forest on a sustained yield for goods and services for the greater good, for the greatest number, over the long term in perpetuity. The first sentence of Title 16 is important to highlight. The departure from this has largely resulted in the destruction of millions of acres of the National Forest and therefore the loss of old growth. The loss of habitat is alarming. For example, in the Eldorado National Forest, the 2021 Caldor Fire resulted in the loss of thirty protected activity centers for the California spotted owl. Loss of owl habitat is a common occurrence duplicated throughout California Region 5 forest over the past three decades due to catastrophic mega forest fires. What is more alarming, the complete destruction of entire rural towns and communities resulted in the loss of life and property.

We urge you to not set aside additional reserves and encourage you to adopt forest management practices that will keep our national forests healthy and productive so the communities that rely on them for their livelihoods can thrive.

ACL believes that you have to cut a tree to save a tree and that 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 recommendations for active forest management within and adjacent to existing old growth stands to protect them from these threats.

In conclusion, ACL members represent a large segment of rural communities working class, loggers, woods workers, truckers, farmers, cattle ranchers, and variety of support industries. Our communities are at risk from large landscape catastrophic forest and wildland fires. We expect a thorough analysis that considers a “bottom-up strategy”. In other words, a centralized forest management system with an analysis covering all 128 National Forest is a recipe for failure. Revisions or individual forest plan amendments covering small geographic areas would allow detailed local involvement. This is the way forward to protecting and sustaining old growth trees. ACL looks forward to your analysis.

Respectfully,

Russ Hawkins

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President Associated California Loggers

Eric Carleson

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Executive Director, Associated California Loggers

