



# TENNESSEE FORESTRY ASSOCIATION

THE VOICE OF FORESTRY

February 2, 2024

Director, Ecosystem Management Coordination  
201 14<sup>th</sup> Street SW, 1108  
Washington, DC 20250-1124

RE: Notice of Intent to Amend 128 Forest Plans for Old Growth: December 20, 2023 Federal Register  
Volume 88, No. 243 88042-88048  
Submitted electronically: <https://cara.fs2c.usda.gov/Public/Commentput2Project+65356>

Dear Sir or Madam:

The Tennessee Forestry Association urges the Forest Service to reconsider the current proposal and adopt a full administrative review that allows for objections to the decisions. The objection process is an important process that allows the public to fully interact with the decision and propose important amendments/changes that create a better solution overall 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 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.

The 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 expediated timeline that will not fully analyze the effects on the current efforts to manage the national forest system to reduce the impacts of wildlife, insects and disease.

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 CO<sub>2</sub> 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.

The Tennessee Forestry Association 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.

Sincerely,

Candace Dinwiddie  
Executive Director