



September 20th, 2024

USDA Forest Service
201 14th St SW
Washington, DC 20227

RE: Comments on Land Management Plan Direction for Old-Growth Forest
Conditions Across the National Forest System

To whom it may concern,

Thank you for the opportunity to comment on the draft environmental impact statement (EIS) regarding the land management plan direction for old-growth forest conditions on our nation's national forests. I work for Interfor, a lumber manufacturer with locations throughout the United States and Canada. In the Pacific Northwest (Oregon and Washington), Interfor is a purchaser of federal timber contracts and participates in local collaborative groups alongside the forest service and other stakeholders.

After reviewing sections of the draft EIS, we are encouraged by the forest service leadership allowing select activities in and around old-growth forests. This is much appreciated, as an outright ban on activity would be detrimental to the agency's goals for creating a resilient landscape. There continues to be a need for more active management on the landscape if old growth is going to be protected from the most common threats (wildfire, insects and disease).

It is concerning that the forest service has spent so much time on this process, likely taking away resources from the wildfire crisis strategy which is a more pressing matter. I worry that the scale of this EIS is too broad for the agency to effectively assess social and environmental impacts of the plan at a local level.

Also of concern is the additional protection of acres already in timber production. The number of protected acres in the Pacific Northwest far exceeds the acres where timber production is allowed. Adding additional constraints to timber production areas takes away supply and reduces the acres that can be treated.

Thank you again for the opportunity to comment on the draft EIS. Interfor looks forward to our continued working relationship with the forest service to help address our nation's wildfire and forest health crisis.

Sincerely,

Neil Kissler

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