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Comments: Please see the attached documents which document projects which could be disrupted if the Forest Service follows through on a policy which places "old-growth" and "mature" forests off limits to management.

FFRC Comments on Fed. Reg. 42493-42494 Vol. 87, No. 135 July 15, 2022

August 30, 2022

Mr. Jamie Barbour

Assistant Director

Ecosystem Management Coordination

USDA Forest Service

Washington, DC:

Dear Mr. Barbour:

Please see the following supplemental comments regarding the above captioned Federal Register Notice.

Wildlife Habitat Impacts of an Ill-Defined, or Ill-Applied Definition of Old-Growth and Mature Forests: As FFRC noted in our detailed comments, many National Forests in the two eastern Regions (the Eastern Region, Region 9, and the Southern Region, Region 8), are frequently experiencing major difficulties in reaching Forest Plan goals and objectives for Early Seral (or young) Forest habitat. FFRC analyzed current projects (either already decided or under analysis) in Region 9, which include regeneration harvest. While not every forest provided the stand age, many did, and substantial acreages were over 80 years old. We reviewed the NEPA documents for these projects and found the following:

- \* In the Eastern Region (Region 9) alone, there are 28 current projects, proposing treatments on over 641,000 acres, which involve the harvest of "mature" (and in some cases "old-growth" trees - if the Forest Service accepts the completely arbitrary cut off of 80 years as defining old growth).

- \* These projects propose regeneration harvests in mature stands on about 181,400 acres.

- \* According to the project NEPA documents, these projects are intended to meet habitat goals for 8 different mammals (Black Bear, White-Tailed Deer, Moose, Northern Flying Squirrel Bobcat, Beaver, Elk, and Snowshoe Hare), 15 different species of birds (Cerulean Warbler, Eastern Bluebird, Chestnut-Sided Warbler, Common Yellowthroat, Golden-Winged Warbler, Prairie Warbler, Song Sparrow, Lincoln's Sparrow, Bobolink, Brown Thrasher, Quail, Ruffed Grouse, Spruce Grouse, Wild Turkey, and Red-Tailed Hawk; and one fish species (Brook Trout).

These projects are all being conducted after considerable public involvement, including during the Forest Planning process, and all have undergone careful environmental review to ensure they are consistent with Forest Plans, don't violate the Endangered Species Act, and meet important plan goals like habitat, successional stages, desired future condition, and hazardous fuels reduction.

Unfortunately we have not had time to review projects in other Forest Service Regions, but we urge the Forest

Service to conduct a similar analysis to determine the extent to which an arbitrary and capricious definition of old-growth and mature forests, combined with "policies" which place those lands off limits to management, will impact their ability to meet goals and objectives found in legally binding forest management plans.

Sincerely,

Bill Imbergamo,

Executive Director

ATTACHMENT: Region 8 and 9 Forest Projects .xlsx