Data Submitted (UTC 11): 1/26/2024 5:00:00 AM

First name: Michael Last name: Beardsley

Organization: Southeastern Wood Producers Association, Inc.

Title: Executive Director

Comments: S O U TH EA S TER N W OOD P RO DUCE RS A S S OC I A T I ON , I NC .

Post Office Box 187 * Tallahassee, Florida 32302

Phone: 904-845-7133 * Fax: 888-252-3919

January 26, 2024

Director - Ecosystem Management Coordination

www.swpa.ag

Mailstop 1108

201 14th Street SW

Washington, DC 20250-1124

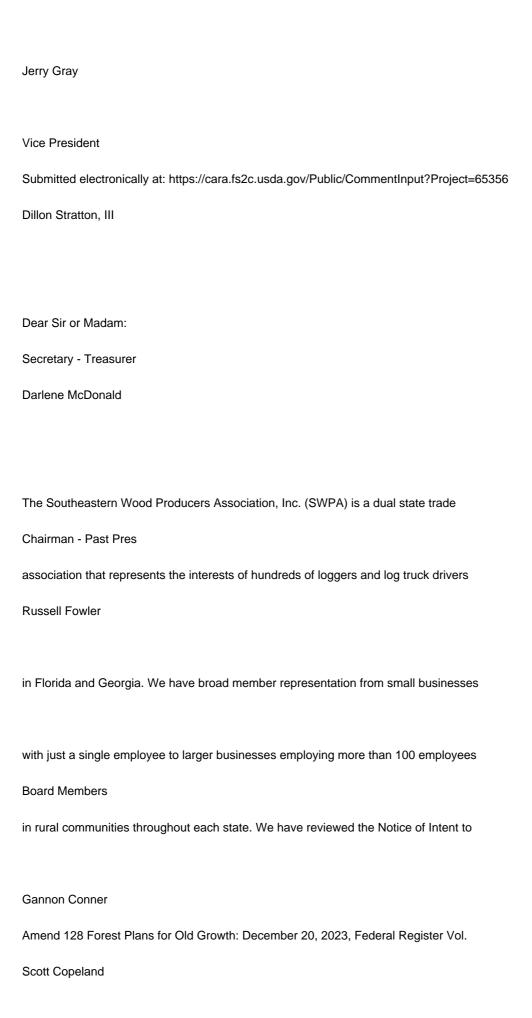
2022 - 2024

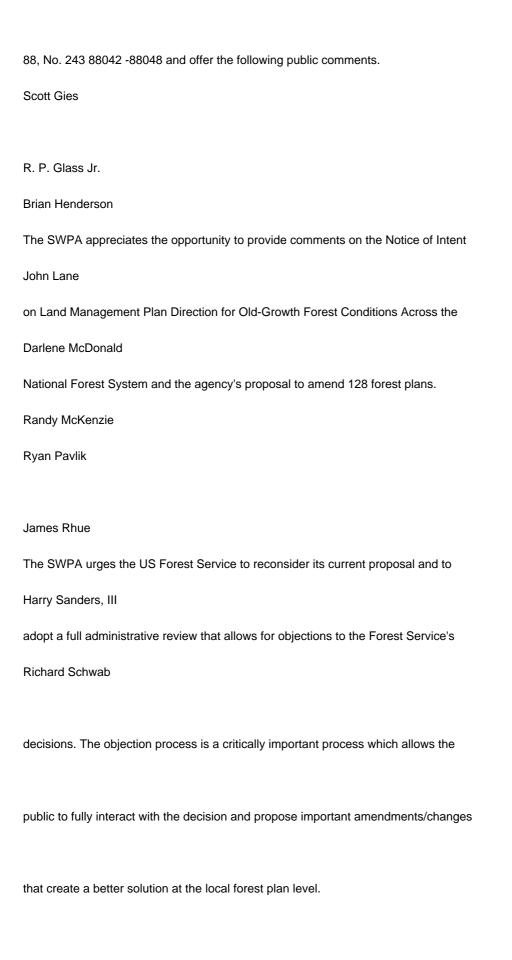
Board of Directors

RE: Notice of Intent to Amend 128 Forest Plans for Old Growth: December 20, 2023,

President

Federal Register Vol. 88, No. 243 88042 -88048





Association Staff

The NOI is an unprecedented effort to impose desired future conditions, standards,

Michael Beardsley

and guidelines onto landscapes that differ so greatly that they have over 200

Executive Director

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.

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
ATTACHMENT: SWPA Public Comments NOI to Amend 128 Forest Plans for Old Growth - USFS.pdf is letter content.