

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 T H E A S T E R N W O O D P R O D U C E R S A S S O C I A T I O N , I N C .

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January 26, 2024

Director - Ecosystem Management Coordination

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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

Jerry Gray

Vice President

Submitted electronically at: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

Dillon Stratton, III

Dear Sir or Madam:

Secretary - Treasurer

Darlene McDonald

The Southeastern Wood Producers Association, Inc. (SWPA) is a dual state trade

Chairman - Past Pres

association that represents the interests of hundreds of loggers and log truck drivers

Russell Fowler

in Florida and Georgia. We have broad member representation from small businesses

with just a single employee to larger businesses employing more than 100 employees

Board Members

in rural communities throughout each state. We have reviewed the Notice of Intent to

Gannon Conner

Amend 128 Forest Plans for Old Growth: December 20, 2023, Federal Register Vol.

Scott Copeland

88, No. 243 88042 -88048 and offer the following public comments.

Scott Gies

R. P. Glass Jr.

Brian Henderson

The SWPA appreciates the opportunity to provide comments on the Notice of Intent

John Lane

on Land Management Plan Direction for Old-Growth Forest Conditions Across the

Darlene McDonald

National Forest System and the agency's proposal to amend 128 forest plans.

Randy McKenzie

Ryan Pavlik

James Rhue

The SWPA urges the US Forest Service to reconsider its current proposal and to

Harry Sanders, III

adopt a full administrative review that allows for objections to the Forest Service's

Richard Schwab

decisions. The objection process is a critically important process which allows the

public to fully interact with the decision and propose important amendments/changes

that create a better solution at the local forest plan level.

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 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.

Sincerely,

Michael Beardsley

Executive Director

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