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Organization: Arizona Farm Bureau Federation

Title: Government Relations Manager

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

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

Dear Acting Director Walker:

The Arizona Farm Bureau Federation is a grassroots organization made up of farmers and ranchers from across Arizona. Together, they form an industry that generates \$23.3 billion in economic impact on the state's economy. We appreciate the opportunity to comment and express our concerns with the U.S. Forest Service's (USFS) Land Management Plan Direction for Old Growth Forest Conditions Across the National Forest System.

As a member of the American Farm Bureau Federation (AFBF), we concur with their comments to this docket and highlight the concerns they raised. First and foremost is the concern with the USFS's proposal to amend 128 land management plans in 12 months, including the six national forests in Arizona. The approach we believe USFS should take to address old growth and mature forest conditions is at the local level with robust public participation that includes stakeholders engaged in public lands timber harvest and grazing, as well those who manage the adjacent farm, range, and forest lands.

Given the uniqueness of each national forest, it is vitally important that local stakeholders, including our members, understand what is considered old-growth forests and what activities may be impacted or compatible with old-growth forest management. It appears that USFS recognizes unique forest conditions by stating in the Federal Register notice that "the structure and composition of old-growth forests is highly place-based and can range from old, multi-layered temperate coniferous forests with

high amounts of dead wood in the form of standing snags and coarse wood to old, single-storied pine forests or oak woodlands with open canopy structures and fire maintained herb and litter dominated understories." Thus, we concur with AFBF that it appears contradictory that USFS would mandate a national standard for old-growth forest management while also acknowledging the unique nature of different types of forests across the country.

Furthermore, Congress has authorized that USFS lands be managed for multiple use and sustained yield. USFS's proposal elevates one component of forest management over others on a national scale. In its discussion of the NEPA process, USFS states in the proposal that the Desired Condition includes "connectivity of old-growth forest conditions." However, there is little detail regarding additional alternatives or how the Desired Condition may impact multiple uses, such as timber harvest and grazing in forest areas identified as old growth.

Another area of concern is how the proposal will impact other USFS priorities, including reducing fuel loads that lead to wildfires. Recent efforts and actions by USFS to increase fuels and forest health treatments across the West should remain USFS's priority and focus, especially given that the agency recognizes that wildfires are a real threat to old-growth forests.

Along with AFBF, we encourage USFS to continue its long-standing practice of amending land management plans on a local and forest-based scale. Additionally, we urge USFS to continue focusing on the wildfire crisis, which has impacted Arizona extensively. Addressing wildfires will ultimately protect old-growth forests, as well as local communities that rely on multiple uses of the forests.

Thank you for your consideration.

Sincerely,

Attachment: AZFB Comments - USFS Land Mgmt Plan Old-Growth Forest.pdf - is the letter text above.