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First name: Tom
Last name: Schultz
Organization: Idaho Forest Group
Title: VP Resources and Govt. Affairs
Comments: Attachment: 24 IFG DEIS response 9.16.docx

September 16, 2024

Director, Ecosystem Management Coordination

201 14th Street SW, Mailstop 1108

Washington, DC 20250-1124

Attn: Jennifer McCrae, Forest Service Team Leader

Dear Ms. McCrae:

Thank you for the opportunity to submit comments on the Draft EIS published June 2024 entitled "Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System," also known as the National Old-Growth Amendment or "NOGA".

Idaho Forest Group (IFG) is one of the largest producers of softwood lumber in the U.S. with six manufacturing facilities in Idaho and Mississippi capable of producing well over 1 billion board feet of lumber annually. A large portion of our raw material supply comes from Regions 1 and 4 of the U.S. Forest Service. Our 2,000+ employees, contractors, and other service providers live and work in the mostly small, rural communities surrounding our facilities where forestry as well as recreation and tourism are significant components of the economy and influence their quality of life. Likewise, the negative effects of wildfire and the current forest health crisis resulting from the lack of active management on public lands also have very real impacts on the overall health and vibrancy of local communities.

IFG supports the no action alternative described in the NOGA. We believe the preferred alternative as currently drafted violates the National Forest Management Act and the 2012 Planning Rule, and that the DEIS fails to take the "hard look" at the consequences of the preferred alternative required by the National Environmental Policy

Act. The analysis of the economic impact of the proposal is also inadequate. We do not feel that the USDA has honestly evaluated the reality of the years-long litigation that is guaranteed to ensue based on the amendments themselves, the mandated Adaptive Strategy for Old Growth Forest Conservation for most Forest Service units, and most detrimental of all, the project level lawsuits that will obstruct forest management. Currently there is approximately 500 million board feet of timber in Region 1 that is already impacted by litigation.

Lack of active management, wildfire, and insects/disease are the primary impacts to old growth forests, not commercial timber harvesting.

- * With the USFS's proposal, 60M+ acres of National Forest System forests would not be managed through human intervention, which would greatly exacerbate wildfire risk.
- * Loss of forested lands (and the old growth trees within them) is 100 times more likely to occur through wildfire, disease, or pest infestation than through commercial timber harvesting. (U.S. Forest Service, 2024)
- * Science-based, active forest management improves forest health and resilience and is necessary to effectively protect the combined 823 million acres of federal forested lands and adjacent state and private property.
- * Removal of dead trees, creating fuel and fires breaks, and managing pest and disease infestations is necessary to prevent the buildup of dangerous fuels.
- * The current federal land management needs at the state scale are unprecedented. Of the 20 million acres that are managed by the USFS in Idaho, only 12 million acres are available for some form of management, with 8 million acres at high risk from forest pathogens, diseases, and high-intensity wildfires. Within these landscapes, 6.1 million acres have been designated by the U.S. Department of Agriculture, with input from the state of Idaho, to prioritize the highest risk areas for treatment. Recognition of the threats posed by current forest conditions has necessitated increased cooperation among federal, state, and local entities, including regulatory authorities and fire organizations in Idaho.
- * The state of Idaho is a harbinger for effective forest management through its collaborative management practices between federal, state, and local entities. Idaho and its partners have developed robust programs and resources to expedite forest health treatments across the region including those designed to protect old-growth and unique forest characteristics.
- * The proposed amendment suggests specific parameters impacting commercial.

The proposal is lacking clarity and is over-reaching in scope.

- * The term "old-growth" is poorly defined by the USFS and they themselves admitted to having difficulty finding a universal definition for old-growth.
- * This proposed nationwide plan for consistency among forests is incompatible with what the Forest Service themselves describe as a "vast variation in old-growth forest character that occurs across North America."
- * The Forest Service itself has definitions of "old-growth" for over 200 different forest types and states that "no one definition represents the diversity of old-growth ecosystems", yet it is attempting to apply a standard protocol across all of them. (U.S. Forest Service and Bureau of Land Management, p. 14, 2024)
- * National forests are ecologically and geographically unique and require different approaches based on local conditions. Regional expertise, cultural input, and historical data must be considered to conserve not only old-growth forests, but all forests.
- * The ambiguity of the proposed plan will make it very difficult for the Forest Service to determine whether forest

management projects consistently align with the plan.

* Lack of clarity will stymie well-intended conservation efforts by exacerbating an already under resourced bureaucracy. There is not enough clarity, not enough funding, and not enough personnel to administer this sweeping change.

The proposal shows insufficient analysis and collaboration.

* The Forest Service was to consider "the accessibility of the process, opportunities, and information" to allow meaningful public participation before developing policies and conservation strategies that address threats to mature and old-growth forests.

* Instead, the agency presented a poorly-cited 8-page pamphlet, followed by an extensive 290 page report a mere 48 days before the publication of the DEIS - not nearly enough time to collaborate and solicit input for such a sweeping proposal.

* The proposal implies that carbon absorption, clean water, soil stabilization, plant and animal habitat, spiritual and cultural heritage values and education, and recreational and tourism experiences all hinge on the health of old-growth forests alone, which we believe not to be the case.

* The forest products industry is not arguing the importance or value of old growth forests. The fact is most lumber producers do not harvest or process old-growth timber and are therefore not concerned about the proposed plan because of a reliance on old-growth logs, but rather, are concerned because it will devolve into a years-long struggle among the National Forest Service regions to determine how to interpret and implement the amendments that will reach far beyond old growth forests. This is a distraction from the real threat to old growth forests, which is wildfire, insects, and disease and does nothing to address climate change initiatives.

* The preferred alternative prohibits proactive stewardship in old growth forests for the purpose of timber production even in the small percentage of Forests' management areas specifically set aside for timber production. First, this is counter to the Forest Service's multiple-use mandates. Second, when combined with vague language such as "Identify and prioritize areas for the recruitment, retention and promotion of old growth forests" or "Identify areas that have the inherent capability to sustain future old growth forests" will absolutely stymie any forest management for the protection of old growth or otherwise. Regardless of well written intentions, these statements will be used by litigants to further tie the agency's hands and prevent implementation of programs like the Wildfire Crisis Strategy, Collaborative Forests Landscape Restoration, and many others. The DEIS and the USDA are not honestly evaluating the extreme social, ecological, and economic impacts of the completely foreseeable litigation that will result, especially considering the recent Chevron ruling.

Thank you for your consideration of these comments. IFG will continue to be available to agency leadership to help find workable solutions.

Tom Schultz

Vice President of Resources & Government Affairs

Idaho Forest Group

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