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Comments: The Forest Service is trying to upend an historic definition of Old Growth which will cause confusion to the general public. Old Growth has historically represented a forest of mature and growing trees while the new definition of Old Growth will include dead snags and deadfall which litters the forest floor. This new attempt to redefine Old Growth seems to be a scheme concocted by the Forest Service and ripe for prosecution under U.S. Code, Title 18>Part 1>Chapter47>1001 for those involved.

Specifically: (a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the government of the United States, knowingly and willfully: (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact.

The change in the Old Growth definition is clearly a scheme which will cause confusion in the public's understanding of what was once known as Old Growth. A simple search on the internet of Old Growth shows mature stands of living trees, not dead snags and dead and downed timber littering the forest floor. The new definition will cause more litigation on fuel reduction projects and active forest management. What is the purpose of redefining an historic and well understood definition when the result will clearly cause confusion in the eyes of the public, the agencies, and the courts?

The new definition will prevent active management of more of our national forests at a time when active forest management is most needed. Use of these newly defined Old Growth areas for resource development, grazing, and recreation could be restricted simply because of the perception of adverse impacts to Old Growth because the new Old Growth definition is not what is currently perceived by the public as living trees. Why is the Forest Service attempting to confuse the public as to what defines Old Growth?

The Forest Service will be required to amend 128 Forest Plans. The Forest Service does not have the capacity to complete the required plan amendments and the required 2-year adaptive analysis.

The Forest Service violated the 2012 Planning Rule by not engaging with local governments as cooperating agencies. The Forest Service violated the 2012 Planning Rule by not engaging with local collaborates as required. This new definition was developed nationally as a top-down action with no local engagement or involvement.

The Forest Service has failed to complete any socio-economic analysis on the impacts of redefining Old Growth. We request the Forest Service complete a comprehensive socio-economic impact analysis to identify any, and all, adverse effects this new definition will have on local economies, the environment, and historic cultures. Failure to take a hard look at these impacts will result in a decision which is both arbitrary and capricious.

Because of the short time frame required under EO#14072, the rushed inventory is full of estimations and assumptions. The inventory is not accurate and fails to consider areas of recent catastrophic fires, disease outbreaks, and flood events. Inventories must be generated with greater accuracy and not through modeling, estimates, and assumptions resulting in errors as was stated in the proposed plan. Accuracy can only be achieved when inventories are completed by local districts familiar with the forest they manage.

Citizens for Balanced Use requests the Forest Service remand their proposed action to redefine Old Growth.

ATTACHMENT: New Old Growth defined 2.docx - Picture with the following text, "Picture of what the new Old Growth definition includes. Dead and down timber"

ATTACHMENT: New Old Growth defined 3.docx - Picture with the following text, "The new Old Growth definition includes dead snags as shown in this picture. This runs contrary to the public's perception of the current Old Growth definition."

ATTACHMENT: Old growth picture 1.docx - Picture of large trees in dry forest and large trees in moist forest with the following text, "What Old Growth is currently defined as and depicted on the internet. This is what the public currently understands as Old Growth. Changing the definition will cause confusion in the public's perception of Old Growth. "