

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

First name: Keven

Last name: Whicker

Organization: Coop - Beaver County

Title: Natural Resource Specialist

Comments: Please see attached comment letter

Attachment: 9.20.2024 Comments on National Old Growth Forest Amendment.pdf

September 20, 2024

U.S. Forest Service National Headquarters

1400 Independence Ave., SW

Washington, DC 20250

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

Beaver County has reviewed the Forest Service Draft Environmental Impact Statement concerning the Old-Growth Forest Conditions Across the National Forest System plan amendment and would like to submit the following comments.

Beaver County has deep concerns about the National Old Growth Forest Amendment referenced above. Our primary concern centers on the one-size-fits-all approach that this amendment puts forward. We have been given abundant assurances in our cooperating agency reviews by well-meaning USFS employees who are working on this EIS, however, the fact remains that this amendment is clearly a product of the environmentalist NGO[s] to stop much of the timber harvesting that takes place on National Forest System lands.

The National Forest Management Act of 1976 (NFMA) was passed to give the Forest Service a requirement to develop plans for managing the National Forest, to set standards for timber sales and to create policies to regulate timber harvesting. The whole purpose for creating the National Forest Service was to provide timber products for America. The tone of the Old-Growth Amendment is in stark contrast to this mandate. Throughout this plan amendment, the bias is clearly to filter out as much timber harvesting as possible under the guise of protecting [ldquo]old growth forests[rldquo]. There is a clear conservation emphasis within this plan amendment.

This amendment fails to consider the distinct forest types and local management needs throughout the National Forest System. In our area, the large catastrophic fires we experience are a result of old, overgrown timber stands that are no longer healthy and resilient. The need to harvest, thin, and prescriptively burn these trees is unquestionable when it comes to preserving the forest health. In our estimation, old trees or [ldquo]Old-Growth Forests[rldquo] are not the objective, rather, healthy and resilient forests should be the prime objective.

The U.S. Forest Service produced a report entitled [ldquo]Mature and Old-Growth Forests: Analysis of Threats.[rldquo] This report found that the greatest threat to old and mature forests was wildfire. Yet, the glaring

effort within the Old-Growth Amendment is to curtail timber harvesting and other activities. It is common knowledge that as a forest ecosystem becomes old and degenerate, the forces of nature will renew the ecosystem by the natural cycle of death, burning and regeneration. It is a natural process that old trees die and become a fuel load for the inevitable wildfire, which in turn brings new growth. Proper forest management can delay or manipulate this process by infusing new growth while removing fuel loads.

Proper active management can interrupt or delay this cycle. However, the goal is to have a healthy and resilient forest, NOT a collection of old trees!

In Beaver County, we have a strong working relationship with our local Ranger District. We coordinate plans and goals to improve our local forest, to provide timber products, to improve watershed health, to improve grazing, and to provide access for numerous recreational activities. Through the Shared Stewardship Program, our district has accounted for millions of dollars in on-the-ground projects that benefit our forest. This proactive approach is working and is a model for other regions to emulate.

However, the Old-Growth Amendment has numerous flaws that would effectively take away from the successful approach we are using.

National Forest System lands should be accessible and beneficial to local communities. They should also contribute to local economies. The primary focus of the Forest Service should be forest health and productivity. Sadly, these goals are not emphasized in the Old-Growth Amendment.

Sincerely,

Keven Whicker

Beaver County Natural Resource Specialist