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Alternatives Considered but Not Given Detailed Study - Increasing Amount of Forested Areas.

I provided comments during the 2019 comment period for the Ashley NF Land Management Plan and I recommended an alternative to allow trees to naturally grow in current non-forested areas. The 2021 DEIS for the Ashley NF land management plan states that "this alternative was considered but not evaluated in detail because it is not within the scope of the plan revision" and "it does not meet the need for change." This statement by the Forest Service in the DEIS is blatantly false and is not in line with the Forest Service's own statutes and regulations.

The Forest Service needs to consider an alternative where the Ashley NF allows trees to naturally grow in areas that have been called "non-forested" by Forest Service staff. Failure to analyze this alternative in the FEIS will be a valid reason for objection.

The proposed alternative would focus on the management of trees within the National Forest in opposition to the current management practice of completely eradicating any trees within areas mapped as non-forested by Forest Service Staff. Trees are naturally trying to grow in multiple areas across the Forest, but active Forest Service projects are attempting to remove all trees from those areas. This alternative would help align the current purposes of the Ashley National Forest with the purposes for which the Ashley National Forest was originally created. This alternative is perfectly in line with the purposes of the 2021 planning rule, the 1976 NFMA, the 1960 Use Sustained-Yield Act, and the original 1891 Forest Service Organic Act, as explained below.

The 1891 Forest Reserves Organic act had the purpose to "set apart and reserve . . . public lands wholly or in part covered with timber or undergrowth, whether of commercial value or not, as public reservations." [Act of Mar. 3, 1891, ch. 561, §24, 26 Stat. 1103]

In 1960, Congress passed the Use Sustained-Yield Act (16 USC 528) which stated that National Forests are to be "administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes" but these additional purposes "are declared to be supplemental to, but not in derogation of" the original purposes of the National Forests, which are "to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States" (16 USC 475).

The 1976 National Forest Management Act reaffirms this purpose when it states, "It is the policy of the Congress that all forested lands in the National Forest System shall be maintained in appropriate forest cover with species of trees, degree of stocking, rate of growth, and conditions of stand designed to secure the maximum benefits of multiple use sustained yield management in accordance with land management plans." (16 USC 1601(d))

No Forest Service statutes or regulations emphasize a need to increase or maintain "non-forested" lands on the Ashley National Forest. In contrast, the overall purpose of the Ashley National Forest, based on federal statutes and regulations, is to maintain the appropriate forest cover and species of trees in order to improve and protect the forest and watershed. All other purposes are supplemental to, but not in derogation of this mandate to protect healthy Forests.

Currently, Ashley National Forest staff implement projects to eradicate trees from tens of thousands of acres of Forest Service lands for the management of livestock, range, and wildlife, even though such practices are in

direct conflict with Forest Service statutes and regulations and often are detrimental to forest cover and forest health. The primary purpose of the National Forest based on statute and regulation is clearly to maintain forest cover and to improve and protect USFS lands as forested lands.

The Ashley NF Land Management Plan needs to come into line with statutes and regulations regarding the need to maintain forest cover and Forest health, rather than emphasizing a need to reduce forest cover and increase non-forested lands within the National Forest. The Ashley NF needs to consider an alternative to increase forest cover across National Forest lands and to allow trees to naturally fill in non-forested areas that have been artificially created for the benefit of livestock and wildlife.