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Organization: Got Weeds?

Title:

Comments: Thank you for the opportunity.

It is troubling to me to read so much about Regeneration in this project Notice of Proposed Action.

I see some 200 stands targeted for harvesting of some kind; the name of the treatment varies, but trees are removed in some manner and Regeneration is a common thread.

Then I read the following published in 2019 via Penn State Extension:

"A comprehensive study in 1995 examined 85 randomly selected timber harvest sites in Pennsylvania. The study sought to determine whether or not our current harvesting practices are affecting timber sustainability. It found that 47 percent of the harvests were unsustainable.

Recent U.S. Forest Service data from Pennsylvania's statewide forest inventory (2019) document regeneration problems. In forest stands where light conditions are adequate for regeneration development, just over 50 percent have adequate seedlings and saplings to regenerate the forest. This finding includes all tree species capable of growing into the forest canopy. When only commercially desirable species are considered, less than 40 percent of these forest stands have adequate regeneration to replace the existing forest.

Many times, forest owners believe that by harvesting forests "selectively" they are addressing regeneration issues. This is not the case."

(Authors: David Jackson, James Finley)

There is more to the article, but I find this deeply concerning, especially as we have seen drought and extreme dry conditions across the state during the spring and summer for four consecutive years. 2019 DRY, 2020 DRY, 2021 DRY, 2022 DRY...

2016 was DRY and DROUGHT

If the US Forest Service in Pennsylvania sees BIG issues with regeneration in harvested stands, does that information not get shared and analyzed in nearby states? And does anyone see or acknowledge that altered seasonal weather regimes worsen the odds for successful forest regeneration? If we harvest on 200 stands, are we seriously satisfied that almost 100 of them will never return to a healthier, pre-harvest condition? Very troubling if that's the case.

No one would get away with that success rate in the world of safety.

If this was the case with aircraft, all flights would be grounded.

This looks like good reason to even call a halt to operations underway right now.

Hard to understand how this can be allowed to continue.