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First name: CTVA

Last name: Action Committee

Organization: Capital Trail Vehicle Association

Title:

Comments: 1. The primary threats to old growth are severe wildfires, insect infestations and disease that have already destroyed nearly 700,000 acres of old growth forests on federal lands over the past 20 years but the new Executive Order would further restrict management of our FS managed lands and is contrary to the balanced needs of the forest.

2. This threat assessment could have provided fresh momentum for the administration to implement its own 10-year wildfire strategy that calls for a threefold increase in forest health treatments on federally managed forests. Under the current process, it takes years and hundreds of pages of paperwork for the U.S. Forest Service to develop and implement these treatments, and even longer when the projects are stalled in court. We support a re-direction of the proposal to further support the USFS 10-year wildfire strategy.

3. We oppose the current proposal because it will direct the Forest Service to embark on another costly paperwork exercise, this time amending all 128 forest land management plans to "conserve and steward" old-growth forest conditions on national forests and grasslands nationwide.

a. We are concerned that the agency will attempt to amend these disparate plans through a single Environmental Impact Statement in less than a year which will not allow sufficient time for the public and will be a one size fits all solution that does not serve the best interests of the public.

4. According to the Forest Service, the policy is intended to provide "consistent" and "adaptive" direction to all national forests. Though it's supposed to advance "place-based" strategies to conserve old growth, we are concerned that the policy will impose a top-down approach where some or all forests will be micro-managed from politicians located far away from the lands and the people that rely on them.

5. This policy is redundant because the management of old growth has been determined at the local forest level through a public process, and through the careful development of Forest Plans that govern each national forest in the country. Each Forest Plan contains its own direction for conserving old growth. Old trees are seldom harvested for economic reasons, though some plans may allow for regeneration on unhealthy stands to help achieve a more resilient forest. Therefore, this policy is not needed and should be dropped.

6. Under the Northwest Forest Plan, for example, three-quarters of national forest land in Northern California, Oregon and Washington are largely off-limits to routine active forest management, including over 7 million acres of "late successional reserves." Recovery actions related to the Northern Spotted Owl have also restricted forest management, even though wildfires have scorched hundreds of square miles of the species' habitat in recent years. This does not count the millions of acres of designated Wilderness, National Parks, wildlife refuges and other areas that are permanently "protected," and instead are burning up in wildfire each year. We oppose the proposed policy because it is contrary to the needs of the forest and public.

7. The report used to justify this policy admits the inventory was rushed because of the short timeline required in Executive Order 14072. The report also relied on 40-year-old data and was based on assumptions and estimates with no on the ground fact checking. The report admits it did not include data on catastrophic fires which have occurred in recent years. This report is flawed and the ultimate implementation is directed at only one goal, to remove people from our public lands and further erode the ability of small communities that rely on access to our public land resources to survive. Because of these flaws and poor choice of direction the proposed policy should be abandoned.

a. The definition of old growth has been changed in the report to include dead snags and down timber on the forest floor. Areas littered with deadfall are now defined as old growth where commercial timber harvests are prohibited except in the wildland-urban interface. The Forest Service has also stated they will not renew grazing leases where grazing may adversely affect old growth forests. The new Executive Order further restricts active forest management and use of our public lands and is contrary to the needs of the forest and the public and best use of our public lands.

b. For example, the report contains the following statements:

"The proposed standards curtail vegetative management (such as timber harvest) within old-growth forest areas."

"Grazing right-of-way permits can be denied if they are inconsistent with the governing plan."

"Be subject to access closures where the Forest Service identifies threats and stressors to mature and old-growth forests."

"The Forest Service has steadily moved away from a mid-20th century overarching emphasis on commodity production values toward the present framework where ecosystem conservation and protection goals, such as the 30-by-30 goal to conserve 30 percent of the nation's lands and waters by 2030."

8. This new Executive Order and the new emphasis of conservation and protection violates the Multiple Use Sustained Yield Act and the Taylor Grazing Act. The main purpose the Forest Service was created and why these lands were put in reserve was for commodity production to benefit the public. This is why the Forest Service was created under the Department of Agriculture. We oppose the proposed policy because of this lack of connection to laws and direction given to the Forest Service.

9. The proposed rule and standards will limit and restrict access for recreation in old-growth forests which is contrary to the purpose and need of the forest and current laws and past direction.

10. The Forest Service claims to provide an exception for active management in old growth forests to "reduce fuel hazards on National Forest System (NFS) land within the wildland-urban interface to protect a community or infrastructure from wildfire." Hazardous fuels reduction should be a goal across the NFS, not just within WUIs, as most wildfires initiate in the backcountry. The Forest Service should expand this exception accordingly to include the entire NFS.

11. Amending 128 Forest Plans only serves as one more distraction for valuable and limited public resources that could otherwise be working now to sustain and develop more old growth forests. The Forest Plan revisions will be done in D.C. where a one size fits all approach will be given to future management of national forests in all states. This approach does not adequately address the needs of each individual forest and the local human population that relies on each individual forest.

12. We are concerned that rather than giving our public lands managers the policy tools and support they need to sustain our forests and all the values they provide, the proposed "paperwork protection" of old growth forests forces public land managers to be more consumed by government bureaucracy which will do little to address the real risks on the ground. We encourage the agency to search for and develop a better solution for both the forest and the public.