

Data Submitted (UTC 11): 1/26/2024 9:32:45 PM

First name: William

Last name: Reese

Organization: Reese Law Firm PC

Title: Attorney/President

Comments: I must urge the U.S. Department of Agriculture to not follow through on the current proposal to amend ALL one hundred twenty-eight land management plans, employing just one singular Environmental Impact Statement, which took less than a year to develop. Such a truncated, summary approach risks undermining the public's trust and confidence in the Department and the Forest Service, and their numerous policy goals.

Furthermore, placing "old growth and mature timber" into one single all-inclusive category conveys the notion there is little distinction between the two terms, which is antithetical to the science and practice of forestry and silviculture. Criteria for "old growth" and "mature timber" varies substantially among the broad spectrum of forest types found across the United States and among the varying tree species unevenly distributed throughout those forests. Forests across the United States geographically and ecologically are unique, each requiring management techniques and options based upon local conditions and species and age distribution therein. Accordingly, locally led forest planning has always been the cornerstone of the Forest Service, and traditionally the most appropriate way for the Forest Service to develop conservation strategies for old-growth forests. The Department of Agriculture has produced no compelling argument to justify the need for this newly proposed nationwide policy and plan. Direction for old growth management has been included in forest planning since the 1980s and will continue to be included and updated as individual forest plans undergo their locally informed review processes, as required by the National Forest Management Act every ten to fifteen years.

The Forest Service was directed by Executive Order 14072 to inventory the lands under its control to ascertain the extent of mature and old growth forests. The Forest Service has determined that nearly twenty-five million acres of the National Forest System already is considered "old growth," and that more than fifty-four percent of these old growth acres are in "protected areas" where active management and harvesting have not been permitted. The Forest Service also has determined that a large portion of "mature" forests in the National Forest System similarly have been off limits to management, providing a significant existing pool from which to recruit future "old growth" forests.

The Forest Service has determined that the most significant threat to old growth is not commercial logging, but rather wildfire, insects, and disease, and has set an ambitious goal of expanding active management to reduce the threat of wildfire through its Wildfire Crisis Strategy. Consequently, this current national directive to amend forest plans for "old growth and mature" forests, across the board, proves to be in direct contravention to the Forest Service's Wildfire Crisis Strategy goals. If the Forest Service would focus its efforts on forest health and wildfire resiliency across the landscape of every National Forest, and especially in the most fire-prone areas, it would do more to protect old growth and mature forests than to limit good management and wise harvesting in and around these areas.

For my firm and my clients, the Allegheny National Forest in northwestern Pennsylvania is of special concern. The ANF comprises over half a million acres of the Commonwealth's nearly seventeen million forested acres. While this represents only about three percent of all of the forested acres in Pennsylvania, the ANF has proven to be a vital component of the Commonwealth's forest ecosystem, providing clean air and water, wildlife habitat, recreation opportunities, and many other social benefits. The ANF also has proven to be one of the only profitable forests in the National Forest System, with a timber program that provides thousands of jobs and generates nearly three million dollars per year to the rural counties in which it is located. Nearly fifteen percent of the ANF's acreage is already protected as old growth and wild area in its current forest management plan, in which no active management is permitted. One of the priority objectives of that same forest management plan,

developed with significant local influence and science-based forest management, is age-class diversification as a means of addressing the impact that wind and weather events, and pests and disease have had on the ANF in recent decades due to an overabundance of mature trees.

Your broad-based national plan amendment, now under consideration, poses a significant threat to ongoing efforts by the ANF forestry staff to address forest health, and to provide for future forest resilience, and will result in dire economic and social consequences in the Allegheny region. Pennsylvania is the number one hardwood producing state in the United States, providing more than sixty-three thousand jobs and over thirty-nine billion dollars per year to the Commonwealth's economy. Policies that jeopardize access to a sustainable timber supply, which was the original overarching goal of establishing the National Forest System more than a century ago, put the entire forest product supply chain at risk. Without a sustainable forest industry, it is impossible to effectively implement any sustainable forest management plan.

To this end, I must refer you Gifford Pinchot's pamphlet entitled "Use of the National Forests," published by the Department of Agriculture in 1907. Gifford Pinchot was the first head of the U.S. Forest Service, and later served as Pennsylvania's twenty-eighth governor. The Society of American Foresters often quotes Pinchot for his underlying philosophy, "the greatest good." Pinchot believed that our National Forests should be managed for the greatest good of our citizens, to provide them with a ready supply of forest products and clean water. Let us not forget why our nation established our National Forest System in the first place, and let us not pretend that your current proposal now under consideration, completely threatens the greatest good to which Gifford Pinchot aspired, and the greatest good to which America has always aspired.