

Data Submitted (UTC 11): 2/1/2024 7:33:55 PM

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Title: Chairman

Comments: February 1, 2024

United States Forest Service

Director, Ecosystem Management Coordination

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Washington, DC 20250-1124

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

Comments submitted via: <https://cara.fs2c.usda.gov/Public//commentInput?Project=65356>

Dear Director,

My name is Gary Scarbrough and I am the Chairman of the Otero County Public Land Use Advisory Council (PLUAC) in Otero County, New Mexico. I am writing on behalf of the members of PLUAC in regards to Federal Register / Vol. 88, No. 243 / Wednesday, December 20, 2023 / Notices, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

The Federal Register Notice (FRN) states: "...the Department is proposing to amend all land management plans to establish consistent direction for old-growth forest conditions across the National Forest System."

Comment: All National Forest System lands are not created equal, therefore providing a "national direction" that treats all National Forest System lands as the same is irresponsible. Each forest must be managed individually.

The FRN questions: "How might the Forest Service use the mature and old-growth forest inventory together with analyzing threats and risks to determine and prioritize when, where, and how different types of management will best enable retention and expansion of mature and old-growth forests over time?"

Comment: Your own FRN states that: "...The initial analysis found that mortality from wildfires is currently the leading threat to mature and old-growth forest conditions, followed by insects and disease. The analysis found that tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects and disease. However, past management practices, including timber harvest and fire suppression, contributed to current vulnerabilities in the distribution, abundance, and resilience of old-growth forest characteristics." Why is "tree cutting" considered only a relatively minor threat, yet timber harvest contributes to the current vulnerabilities? PLUAC believes that the statement that timber harvest has "... contributed to current vulnerabilities in the distribution, abundance, and resilience of old-growth forest characteristics." is disingenuous. There has been little to no timber harvest since the early to mid-nineties on the majority of the old-growth National Forest System lands because of the Endangered Species Act (ESA) protection of the spotted owl. The lack of timber harvest and thinning has created a much greater vulnerability to the distribution, abundance, and resilience of old-growth forest characteristics. It has created the very thing that your initial analysis has found that causes old-growth mortality...wildfire, insects and disease.

The FRN also asks: "Given our current understanding of the threats to the amount and distribution of mature and old-growth forest conditions, what policy, management, or practices would enhance ecosystem resilience and distribution of these conditions under a changing climate?"

Comment: Mismanagement of National Forest System lands by not harvesting and thinning trees and shrubs has exacerbated the decline of the health of the National Forest System lands. It has allowed the over-growth of all

trees and shrubs and substantial litter has accumulated on the forest floor. Years of mismanagement has led to water depletion, insect infested and diseased trees, plus the ongoing wildfire crisis. The absence of proper management, such as logging/thinning and proper prescribed burning, has created the exact wildfire crisis that this FRN purposes to abate.

The FRN states that: "The Department is requesting comments on the proposed action, including any modifications or additional language, potential alternatives, and identification of any relevant information, studies, or analyses concerning impacts that may affect the quality of the environment."

Comment: Old-growth areas of the National Forest System lands have been in a protected status for many years because of the supposed endangered spotted owl as well as other reasons. Basically all the "protection" has accomplished is a mangled mess of trees that completely cover and shade the forest floor. Vegetation and browse, such as grass, flowers, weeds, etc. are decimated. Animals are forced to vacate the National Forest System lands in search of other food sources. Retention and/or expansion of such "old-growth" areas would only cause the current conditions to expand.

Foremost, PLUAC recommends that the USFS withdraw this amendment proposal. In the very least, PLUAC submits this "potential alternative." In accordance with the purposes that the National Forest System lands were established; to provide a continuous supply of timber for the American people, to protect the watershed, and to manage the lawful multiple uses upon the National Forest System lands, the United States Forest Service (USFS) must use all avenues available to the USFS to harvest the timber, clean the debris from the forest floor, and remove any trash trees (i.e. overcrowded, dead and diseased trees) and encroaching brush or shrubs from both the mountains and the meadows.

Thank you.

/s/Gary Scarbrough
Chairman of the Otero County Public Land Use Advisory Committee
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cc: Otero County Commission
Otero County Attorney R.B. Nichols
Secretary of Agriculture Tom Vilsack
New Mexico Secretary of Agriculture Jeff Witte