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RE: Comments on 12/20/23 Federal Register Vol 88, No 243 88042-88048

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

On behalf of the Allegheny Hardwood Utilization Group (AHUG), thank you for the opportunity to respond to the NOI on Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

AHUG is a non-profit forest industry association (501c6) organized in 1984 for the purpose of promoting the long-term economic growth and development of the forest and wood products industry of Northwest and North Central, PA. In accomplishing this mission, AHUG provides support for hardwood research and development, workforce development and training, promotion of hardwood products and the furthering of sustainable, science-based management and utilization of the region's forest assets. AHUG's membership includes nearly 100 organizations within the 14-county Allegheny Plateau region, representing all sectors of the forest products supply chain - from the landowners, foresters, loggers, and haulers who prescribe and implement forest management, to the sawmills, value-added, industrial and by-products companies who manufacture the wood products that fuel our daily lives. AHUG collaborates with a host of regional, state, and federal organizations in advocating for the health of Pennsylvania's forests - including the Allegheny National Forest - and for the citizens who depend on resilient, actively managed forests as vital economic drivers of their rural communities.

We urge the Department to reconsider the current proposal to amend all 128 land management plans using a single Environmental Impact Statement developed in less than a year. This type of approach risks undermining public trust and confidence in the agency, the science it is relying upon to inform its management approach, and any policy outcomes related to the management of old growth and mature forests. Furthermore, constant reiteration of the phrase "mature and old growth timber" throughout the duration of the nearly two-year process resulting from Executive Order 14072 has melded two distinctly separate concepts into a seemingly singular term, conveying the notion that there is little difference between the two, furthering the public's misunderstanding of this complex issue.

Our National Forests are dynamic systems, with criteria for old growth and mature timber varying substantially among the array of forest types found across the United States, and even within individual NFS units. These forests are geographically and ecologically unique, requiring a variety of management techniques based on local conditions. Hence, the locally led forest planning process is the most appropriate way for the Forest Service to develop conservation strategies for old growth forests. Direction for old growth conservation and mature timber management has been included in forest plans since 1984 and will continue to be included and updated as individual forest plans undergo the locally informed review process required every 10 to 15 years under the National Forest Management Act. To that end, the Department has produced no compelling argument to justify the need for the proposed nationwide plan review.

The Forest Service and Bureau of Land Management were directed by Executive Order 14072 to inventory the lands under their control to ascertain the volume and range of mature and old growth forests. By generalizing from regional definitions of old growth and FIA data, the Forest Service has determined that nearly 25 million acres of the NFS is already considered "old growth," and that more than 54 percent of these old growth acres are

in "protected areas", where active management and harvest are not permitted. The inventory also determined that a large portion of "mature" forests on the National Forest System were similarly off limits to management, providing a significant existing pool from which to recruit future "old growth".

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. The agency should publicly document and clarify how this current national directive to amend forest plans for old growth and mature will assist the agency in achieving its Wildfire Crisis Strategy goals. While the NOI mentions the need to reduce fuel loads near communities and the Wildland Urban Interface (WUI), most wildfires ignite and spread in the backcountry directly threatening old growth forests. This requires the Forest Service to focus on forest health and wildfire resiliency across the landscape and on the most fire-prone areas. The Forest Service should take advantage of this opportunity to increase the pace and scale of active management to improve forest health and resiliency to wildfire, non-native invasive plants, insects, and disease that are responsible for the loss of millions of acres of mature and old growth on our National Forests.

From a Pennsylvania perspective, the Allegheny National Forest comprises 515,000 of the State's nearly 17 million forested acres (just over 3%), yet this National Forest is a vital component of the State's forested ecosystem, providing habitat, clean air and water, recreation opportunities and a myriad of other benefits. It is also one of the only profitable forests in the National Forest System, with a timber program that provides countless jobs and generates nearly \$3 million dollars per year in 25% timber receipts to the four rural counties within the Forest's footprint (less than half of what it generated in 2005, yet still a critical component of the local economy). Nearly 15% of the Allegheny's acreage is not manageable for timber production, including areas already protected as old growth and wild areas in their forest management plan, with no active management 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, pests and disease have had on the Allegheny in recent decades due to an overabundance of mature trees (more than 70% over 80 years old on the majority of active management units, as per Allegheny Forest Health Collaborative Threat Matrix, revised 2017). The proposed amendment of a top-down review of the Allegheny's forest management plan, with the potential to increase "old growth" through "recruitment" from mature age classes, poses a significant threat to ongoing efforts to address forest health, and to provide for the future forest resilience, economic and social vitality of the Allegheny region. Furthermore, this short-sighted policy could have potentially devastating impacts if carried over to state forest management, as Pennsylvania's State Forests and State Game Lands (over 5 million acres combined) also contain significant quantities of mature timber. Pennsylvania is the number one hardwood producing state in the US, providing more than 63,000 jobs and over \$39 billion per year to the State's economy. Policies that jeopardize access to a sustainable timber supply put the entire forest and wood products supply chain at risk. Without a robust forest industry, it is impossible to effectively implement any forest management plan.

All the above demonstrate that there is little benefit in pursuing a nationwide forest plan amendment that inherently violates substantive provisions of the 2012 Planning Rule, including requirements for significant local stakeholder engagement with the Forest Service in developing and updating forest plans, and ensuring that the economic vitality of impacted rural communities are supported. This proposal could also hinder individual Forest's ability to meet other, equally valid forest management objectives in current Forest Management Plans. Given the generally poor conditions on many acres of National Forests, allocating limited staff time to a national plan amendment is a strategic misallocation of resources.

In addition to the numerous concerns noted herein, AHUG supports the comments submitted by Federal Forest Resource Coalition and the Forest Resource Association regarding the NOI on Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

We strongly urge the Department to take the No Action option on this proposal, and to continue addressing old growth conservation and mature timber management through the existing locally led, coordinated planning process. This process should engage in true climate smart forestry, which seeks to manage stocking levels and a variety of age class distributions appropriate to each forest type, to engage in regulated harvest on unreserved acres (recognizing the substantial carbon storage in long-lived wood products), and to include aggressive salvage and utilization of damaged timber, along with adequate reforestation/regeneration activities following disturbances.

Sincerely,
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