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Comments: I am the CEO of Starfire Lumber Company in Cottage Grove, OR. We've been in business since 1983 and employ over 80 people at a median wage of just under \$28/hour in addition to generous health and retirement benefits. Historically we've been dependent on federal timber primarily from the Umpqua, Willamette and Siuslaw National Forests as well as BLM/O&C lands within a roughly 200-mile sourcing radius of our sawmill. These highly productive (when correctly managed) federal forest lands remain critical to the raw materials base that sustains our industry both locally and regionally.

As active and supportive members of the American Forest Resource Council (AFRC), we fully endorse the comments on this endeavor that will shortly be submitted by AFRC's extremely knowledgeable, professional staff. My comments are intended to supplement AFRC's from a broader, more generalist perspective.

1. You cannot "protect" old growth. Forests in the Pacific Northwest, like forests everywhere, are dynamic ecosystems. The notion that there's some ideal snapshot of a forest condition, age class and other characteristics that can be preserved in perpetuity is pure folly. If left alone, even assuming they didn't burn or succumb to insects or disease, these forests are always changing. They go through succession cycles where shade-intolerant species-primarily Douglas Fir-reach the end of their natural lifespan and fall over. When this happens, understory species such as Western Red Cedar and a variety of true firs begin to supplant them and become more predominant over the landscape. This cycle repeats itself every few hundred years. Incidentally, this is the same sort of wrong-headed, borderline insane thinking that has put USFWS on the path toward shooting Barred Owls. The idea that there's a "correct" snapshot of nature we can permanently encase in amber by destroying a species that's more adaptively successful than another closely related species derives from very much the same sort of seriously misguided nonsense informing this effort. Over 99% of all species that have ever existed are extinct because a changing world selected against them and they were supplanted by species that outcompeted them. As with individual species, our forests will continue to change in open defiance of our futile efforts to hold these changes in abeyance. Man plans, God laughs.

2. The goal of forest management should not be maintaining a specific aesthetic, but overall forest health. There is an overwhelming amount of work needed in forests throughout the Intermountain West to make forests of all types more resilient against fire, insects and disease. Fixating on "old growth," however defined (and there isn't a settled definition) is a distraction and diverts resources from this far more pressing, FAR more important problem. Moreover, addressing overall forest health is a problem we can actually make headway against, unlike protecting something that cannot be protected even if infinite resources could somehow be deployed toward that task.

3. In the past 2 decades, fire has destroyed vastly more habitat for sensitive and listed species than logging did in the previous 150 years. It has also destroyed billions in property, devastated communities and killed a lot of people. This problem will continue and likely worsen until the Forest Service gets itself focused on the correct priorities, none of which have much overlap with this old growth initiative.

4. In areas of the country where the forest industry infrastructure has been extirpated through mismanagement, getting this critical forest health work done has proven exceedingly difficult. No market for forest products makes already expensive forest health and restoration work cost-prohibitive. It also impoverishes the communities that grew up around these industries and robs local governments of the resources they need to provide basic services.

In short this old growth initiative is a solution looking for a problem in a subject area where there's no shortage of real, pressing, profoundly important problems already in existence. I urge all who are behind it to abandon this futile, ruinous course and refocus on real problems with actual solutions.

Respectfully submitted,

Sean M. Smith, CEO

Starfire Lumber Co.