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Comments: We appreciate the opportunity to submit these comments on the Draft Environmental Impact Statement for "Amendments to Land Management Plans to Address Old-Growth Forests across the National Forest System," published on June 21, 2024.

Conserving mature and old growth forests is critical as they provide an invaluable suite of benefits to society. But we're concerned the amendment will add unnecessary bureaucratic delays that hinder the urgent forest health treatments needed to combat wildfire, drought, insect infestations, and disease-threats that have already destroyed nearly 700,000 acres of old growth forests on federal lands over the last 20 years. The USDA-Forest Service (agency) proposal represents an unprecedented action that would amend 128 federal forest management plans. This truncated effort will have lasting implications for national forest plan revisions and old growth conservation across the United States. The proposed action has multiple flaws and is attempting to accomplish too much in a short timeframe, setting the agency up for failure and litigation. The current analysis is insufficient as it is impossible to understand all the intended and unintended consequences of these actions across 128 individual forest plans that provide management direction for 193 million acres of federal forest ownership.

The primary threats to old growth forests aren't chainsaws or commercial logging, as the Forest Service's own analysis confirms. Instead, the major threats come from a wide spectrum of forest health concerns that are rapidly changing and emerging (e.g. severe wildfires, drought, insect infestations, and diseases). Unfortunately, the proposed amendment adds layers of bureaucracy and red tape, instead of prioritizing active forest management to mitigate these threats. Additionally, we're concerned that the amendment is too rigid to accommodate future changes and fails to define contingency plans.

Under the current process, it already takes years for the Forest Service to implement forest health treatments, which are critical to reducing the risk of catastrophic wildfires. These delays are often made worse when projects are halted by litigation. The Forest Service's threat assessment highlighted that over 70% of mature and old growth forests are at high risk of wildfire-caused mortality. This is compounded by the fact that forests in areas reserved from active management, such as wilderness areas, have seen greater losses of old growth than forests where limited timber harvest is allowed. In contrast, old growth forests have increased on managed forests.

To be succinct, extra bureaucracy won't save our forests and could have the unintended consequence of furthering us from the objective. Empowering local land managers to have the proper flexibility to appropriately and actively steward our forests is paramount to ensuring the protection of our forests, including our invaluable old growth forests.

Thank you for the opportunity to comment on this effort. We are very concerned that the proposed process the agency has undertaken will have detrimental effects on the ability of the Forest Service to carry out multiple-use management by imposing top-down plan amendments restricting the ability of individual national forests to adequately assess regional impacts effectively resulting in negative, unintended and/or unforeseen consequences for old-growth forest conservation.