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Comments: We are very concerned that the Old Growth amendment will add unnecessary bureaucratic delays that hinder the urgent forest health treatments needed to combat wildfire, 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 primary threats to old growth forests aren't chainsaws or commercial logging, as the Forest Service's analysis confirms. Instead, the major threats are severe wildfires, insect infestations, and disease. Unfortunately, the proposed amendment adds layers of bureaucracy and red tape, instead of prioritizing active forest management to mitigate these natural threats.

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 actually increased on managed forests.

* Severe wildfires are the greatest threat to our forests, wildlife and communities. We need policies to accelerate forest thinning and other management activities.

* Extra bureaucracy won't save our forests-proactive stewardship will. Empower our public lands managers to do their jobs and take care of the forests.

* Rather than adding more red tape and litigation to the management of our federal forests, individual national forests should focus on implementing the Wildfire Crisis Strategy through their existing forest plans to achieve desired conditions on these landscapes.

* Implementing a policy to address old growth on a national level as one size fits all makes absolutely no sense. The national Forests in the United States vary tremendously from one area to the next, decisions on old Growth should be implemented at the local level utilizing those that know best how to manage the forest to meet possible old growth objectives.

* Forestry expertise within the Forest Service needs to be used to make decisions on the national forests. If your goal is to manage for the forest for multiple use include those employees that work out on the ground with the public to empower them to make decisions instead of one size fits all blanket approach. In our region it seems that most of the local Forest Service personnel that I speak to think the approach being taken to old growth is not good management.

* Old growth management like any other policies on the national forest should be driven by what is best for the sustainability of our national forests not political agendas of the administration based solely on locking up our national forests.