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Comments: Director, Ecosystem Management Coordination

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Attn: Jennifer McCrae, Forest Service Team Leader

Dear Ms. McCrae:

Thank you for the opportunity to submit 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.

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. While old-growth forests are a vital component of healthy ecosystems, I am concerned that the proposed approach will increase bureaucratic red tape, hinder active forest management efforts needed to mitigate wildfire risks, insect infestations, and disease outbreaks, and negatively impact the many rural forest-based economies dependent on a reliable and predictable supply of sufficient timber resources from federal lands.

The proposed amendment fails to meet the standards and intent of the 2012 Planning Rule. The entire process lacks significant public engagement/involvement at the local level due to the hastened timeline for development. In addition, the analysis failed to assess the impacts on local communities, ecosystems, and economic outcomes. The agency claims that the amendments will have no effect on the amount of timber produced or the lands suitable for timber harvesting. However, the amendment directs the Forest Service to develop an adaptive management strategy for the conservation of old growth and the recruitment of future old growth across all national forest systems. This action alone will limit management on suitable timberland acres, significantly impacting timber harvest. This proposed strategy, if implemented, will circumvent management decisions at the local level on the national forest system lands without analyzing how these management decisions will affect the agency's responsibility provided by the Multiple Use and Sustained Yield Act.

The proposed amendment directs the Forest Service to develop an Adaptive Management Strategy for Old-Growth Conservation. The direction includes requiring the Forest Service to identify all old-growth acres across the planning unit as well as identify areas for the recruitment of old growth. This strategy would allow the Forest Service to create a management designation for old growth and future old growth without performing the required analysis required by the National Environmental Protection Act.

It is not clear how the proposed amendment and its implementation will affect current and future projects. The proposed amendment is attempting to do too much too quickly. Currently, the proposed amendments are disconnected from the conservation of old-growth because the amendments do not actually address the threats of insects, disease, or wildfires. To address these threats, I recommend the agency select the No Action Alternative. Further, I recommend that the agency provide high-level guidance to national forests to consider

during individual forest plan revisions for old-growth conservation. This process will allow the public to fully understand the implications of a national forest old growth strategy for their communities.

Thank you for the opportunity to comment on this effort. I'm 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 consequences for old-growth forest conservation.

Sincerely,  
Randy Keen