



State of Utah

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Governor

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Lieutenant Governor

Office of the Governor
Public Lands Policy Coordinating Office

REDGE B. JOHNSON
Executive Director

August 15, 2022

Submitted via electronically: <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

Christopher French
Deputy Chief
National Forest System
U.S. Forest Service
Sidney R. Yates Building
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Washington, D.C. 20250

Tracy Stone-Manning
Director
Bureau of Land Management
760 Horizon Drive
Grand Junction, CO 81506

Subject: Request for Information (RFI) on Federal Old-growth and Mature Forests

Dear Deputy Chief French and Director Stone-Manning:

The state of Utah (State) appreciates the opportunity to submit feedback on potential future implementation efforts associated with provisions of Executive Order (EO) 14072: Strengthening the Nation's Forests, Communities, and Local Economies, issued April 22, 2022. The focus of this current request for information is to inform the response to E.O. 14072 Section 2(b) specifically, which calls on the Secretaries of Agriculture and the Interior, within one year, to define, identify, and complete an inventory of old-growth and mature forests on Federal lands, accounting for regional and ecological variations, as appropriate, and making the inventory publicly available. In collaboration with the Division of Forestry, Fire and State Lands (FFSL), the State submits the following comments for your consideration.

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1. What criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for planning and adaptive management?

In considering the definition of old-growth and mature forests, Utah would like to ensure that forest conservation, along with planning and adaptive management priorities focus on the importance of prioritizing forest health over a universal definition. Passive forest management in many areas of the country, driven by a lack of resources and litigious NGOs, has placed our forests in their current unhealthy state, with tree densities that facilitate beetle kill and the resulting fuel loads that lead to catastrophic wildfire (especially during periods of drought). After inventorying the mature and old growth forests, this information should be used to prioritize areas for vegetation management, fuels treatments, and other forms of active management that will increase the health of these forests and reduce the loss of life and property from wildfire in the long term.

Conserving and planning for the adaptive management of mature and old-growth forests should be determined by what resources are to be protected or managed. Efforts should be made to consider the multitude of competing interests and needs. For example, the Nation has an affordable housing crisis that is exacerbated by focusing on conservation over timber harvest. The Chairman of the National Association of Home Builders recently testified at a forum held by the Republican members of the House Natural Resources Committee that “timber harvests from the National Forest System averaged between 10 and 12 billion board feet for a 40-year period from the mid-1950s and then plunged precipitously to an average between 1.5 and 3.3 billion board feet per year starting in the mid-1990s due to bureaucratic red tape and litigation.” This reduced production from federal lands has been partially responsible for an “unprecedented rapid rise in lumber prices... that has added nearly \$36,000 to the price of a new home...”. (see <https://www.nahb.org/blog/2021/06/NAHB-Chairman-Urges-Congress-to-Boost-Lumber-Production-from-Federal-Lands>). The cost of a new multifamily living unit has increase nearly \$13,000 due to the rise in lumber prices (see <https://www.cnbc.com/2021/04/30/soaring-lumber-prices-add-36000-to-the-cost-of-a-new-home.html>).

In 2012, 90 percent of the wood and paper products sourced domestically originated on private lands. With the US Forest Service and the BLM managing over 102.2 million acres of timberlands and only 57 percent of the timberlands held under private ownership, the federal government should be making a larger percentage of its timber holdings available for harvest (see: <https://crsreports.congress.gov/product/pdf/R/R45688>). If the Nation is to have sufficient timber supplies to manufacture wood and paper products demanded by consumers and needed to house a growing population, it must increasingly rely on imports and accept higher prices unless Congress or federal agencies act now.

The State recognizes the goals that exist beyond timber and wood product production, like wildlife habitat improvement, water resource protection, or the reduction of hazardous

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fuel loading through thinning of overly dense stands to prevent catastrophic wildfire. Thus, developing a universal definition framework for mature and old-growth forests must primarily account for goals and needs of planning and adaptive management in our Nation's forests. Funds should be allocated for collaborative efforts like Utah Shared Stewardship and additional forest health projects across the west, which incorporate multiple stakeholder inputs in the prioritization and management process. Focusing too heavily on defining mature and old-growth detracts from the imminent need for increased funds and capacity to address forest health issues.

If the agencies continue moving forward, when the Department of Interior and U. S. Department of Agriculture have developed a draft definition framework for old-growth and mature forests, the State requests that this information should be shared with all stakeholders (including states and counties with federal forests within their jurisdictions) for review and comment.

2. What are the overarching old-growth and mature forest characteristics that belong in a definition framework?

Old-growth forests are typically characterized by stands of timber that have never been cut for harvest. These forests are in a late stage of forest succession (late seral or climax forest), biologically diverse, at an increased age, and are important sources of carbon sequestration. The definition is largely dependent on the particular tree species, geographic location, site condition, and disturbance regime. Mature forests are typically characterized by stands of timber that are not old-growth but are in locations with a previous history of timber harvest but the replacement stands have attained a size that would facilitate harvest for a new round of forest products (whatever those may be). Mature forests could be identified by measuring a certain percentage of trees at a certain diameter at breast height (dbh) and age applicable to the various tree species present in the forest.

Mature and old-growth forests should additionally be capable of withstanding regular disturbance, which improves forest health and lessens the chance for large, catastrophic disturbances.

3. How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site productivity and geographic region?

Each unit of the national forest system, or a group of units within the same National Forest System Region, should utilize a definition that reflects the forest type/composition, climate, site productivity and geographic region. The State recommends that the definition be tailored to conditions in each of the nine National Forest System Regions (see Figure 3 in <https://crsreports.congress.gov/product/pdf/R/R45688>). There should not be a "one-size-fits-all" definition. Many national forest units or BLM field offices may already have a definition that helped them previously identify mature or old-growth forests in their areas for their forest or resource management plans.

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4. How can a definition be durable but also accommodate and reflect changes in climate and forest composition?

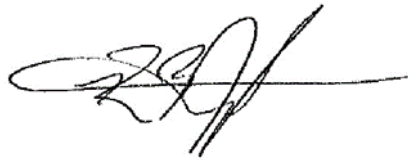
By being flexible and based on conditions in each of the nine National Forest System Regions. The definition should include built in periods for re-evaluation and additional input from both partners and the public to ensure the definition can respond to changes in forest health and the climate.

5. What, if any, forest characteristics should a definition exclude?

Exclude “canopy cover” as the percentage of canopy cover depends on forest composition and other factors; not necessarily on whether the area is mature or old-growth. The definition for mature forests should not require a specific age to be considered mature, to account for those trees present in forests that are prone to disturbance.

Please direct any written correspondence to the Public Lands Policy Coordinating Office at the address below or call to discuss any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Redge B. Johnson', with a long horizontal flourish extending to the right.

Redge B. Johnson
Executive Director