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August 23, 2022

Mr. Jamie Barbour, Assistant Director
Ecosystem Management Coordination
USDA Forest Service
Washington, D.C.

RE: Request for Information (RFI) on Federal Old-growth and Mature Forests, 87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185

The Port of Port Angeles appreciates the opportunity to comment on how to define and inventory “old-growth and mature forests” on federal lands. Nearly half of the 193 million acres of national forest system lands is conserved (Congressionally designated areas, recreation sites, and areas that are not suitable for timber harvest). Only 26 percent is classified as suitable for timber harvest but merely .3% of the suitable lands are harvested¹.

The Port of Port Angeles’ jurisdiction covers Clallam County, which is in a rural, equitably distressed community in the Pacific Northwest and is a hub for domestic export of wood products within Washington and to Oregon from state and private lands. Sustainable forest harvesting provides some of the best paying jobs in rural communities, that otherwise would face even more hardships. Unfortunately, minimal National Forests are harvested or actively managed as a renewable and sustainable green alternative building material compared to concrete and steel. In Clallam County, every year, for every acre managed, roughly 3 acres of National Forest lands become unavailable for management due to an arbitrary age limit. And with no long-term timber management land allocations, the sustainable supply of timber from the Olympic National Forest will go to ZERO in about 40 years. In the long run this is not good for the environment or the local economy.. Further, due to the lack of proper forestry management, the fire risk posed by National Forests from being densely packed and unhealthy due to insect and disease outbreaks, continue to increase.

We are concerned that any single definition of old-growth and mature forests could be so vague that it's useless in guiding forest management across the nation. There is no scientific basis for use of an arbitrary age or diameter limit in defining old growth and mature forests. The variability in site conditions solely on the Olympic Peninsula creates broad variability in the stand structure and age that creates the forest stand conditions that represent late seral condition. ***In no case, should the agencies adopt a definition based on arbitrary size, age, or diameter limits. It is unscientific to come up with a single definition of old growth that applies to many diverse forests and forest types across the United States.***

Well-meaning but misguided efforts to define old growth and mature trees will lead to arbitrary policies that limit the ability of federal agencies to treat unhealthy, overstocked, fire-prone forests and will lead to less old-growth on the landscape over time as these forests disappear due to disease and fire. Wildfire, drought, insects and diseases, and the resulting high tree mortality have reduced the ability of federal lands to sequester and store carbon². The worst thing we could do during a climate crisis is to walk away from our

¹ USDA Office of Sustainability & Climate, Timber Harvest & Carbon flyer, March 2020

² Frontiers in Forests and Global Change, Insect and Disease Disturbances Correlate With Reduced Carbon Sequestration in Forests of the Contiguous United States, October 1, 2021

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public lands and decide not to use the tools available to help adapt these lands to changing conditions and reduce the risk to catastrophic wildfires.

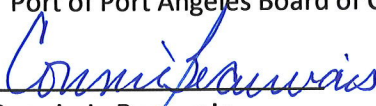
We are concerned that an effort to "define and inventory" older forests diverts limited resources away from our national wildfire and smoke crisis. ***The US Forest Service and Bureau of Land Management should focus on accelerating active forest management on federal lands to reduce the risks of severe wildfires and to improve our forests' resiliency to fire, insects and disease, and to adapt these landscapes to the impacts of climate change.***

Again, the Port of Port Angeles appreciates the opportunity to comment on the how to define and inventory "old-growth and mature forests" on federal lands. The management of USDA forest lands connects with and aligns with the Port's mission to "bring people, resources and industry together to foster economic prosperity and living wage jobs". The forest products industry is important to the economic well-being in Clallam County.

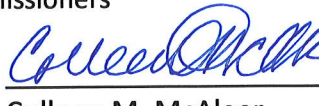
During 2018-2022, the Port retained Dr. Daniel Underwood to examine (1) the contribution of the forest products industry to Clallam County, and (2), the role and impact of the Port's log handling and sorting facilities in supporting the forest product sector on the North Olympic Peninsula (Clallam and Jefferson counties), and (3) the environmental and social benefits of the Port's intermodal handling and transfer facility. The analysis showed that for every direct job in the forest industry, 1.3 indirect and induced jobs are created.¹ The forest product industry has the highest job multiplier effect for our county. The Port's facilities support forest product related jobs beyond Clallam County and any increase in available timber increases the financial viability of mills on the North Olympic Peninsula and regionally which are historically operating with thin margins. In our economically distressed region, the annual median private sector wage is \$36,747 in 2021. Whereas, the North Olympic Peninsula mills provide an annual average wage of \$84,331, which is \$47,584 higher. Economic benefits take the form of employment and wage impacts from mills in Clallam and Jefferson Counties and mills along the Northwest Coast, estimated at 2,485 jobs at an annual average wage of \$80,496. Those operations support an additional 3,307 jobs at an average annual wage of \$44,295.²

Underpinning all of this is the supply of timber from private and public lands. The USDA Forest Service and Bureau of Land Management can support struggling rural communities across the nation by focusing on accelerating the implementation of modern forest management practices on federal lands and at the same time reduce risks of severe wildfires and improve the health of our forests. Thank you for the opportunity to provide comments.


Best Regards,
Port of Port Angeles Board of Commissioners



Connie L. Beauvais
President



Colleen M. McAleer
Vice-President



Steven D. Burke
Secretary

¹ Underwood, Daniel, The Port of Port Angeles Log Yard; A Nexus in the Forest Products Industry, 2018

² Underwood, Daniel, The Port of Port Angeles Where Green Meets Blue – the Port of Port Angeles" Intermodal Handling & Transfer Facility; A Preliminary Investigation, 2022