



SIERRA PACIFIC INDUSTRIES

P.O. Box 496028 • Redding, CA 96049-6028 • (530) 378-8000 • Fax (530) 378-8109

August 26, 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

Dear Mr. Barbour:

I am writing in response to the Request for Information (RFI) which grew out of the President's Earth Day 2022 Executive Order 14072 "Strengthening the Nation's Forests, Communities, and Local Economies."

Sierra Pacific Industries (SPI) is a 3rd generation family-owned forest products company employing about 6000 people in rural communities across the United States. In addition to sustainably managing 2.4 million acres of our own private forestland in the West, we are the second largest U.S. lumber producer and also manufacture millwork, windows and doors, and renewable energy. All of what we produce is American made. SPI is a member of American Forest Resource Council (AFRC) and Federal Forest Resource Coalition (FFRC) which are both submitting comments on the RFI. Please reference those comments in addition to ours.

SPI has a long history of partnership with USFS and BLM. We have successfully completed hundreds of timber sale contracts and Stewardship projects across California, Oregon and Washington. SPI's skilled workers, resource professionals, processing facilities and vast network of independent logging and hauling contractors are vital to achieving the USFS and BLM's sustainable forest management goals. In addition, we work closely with USFS and other partners to reduce wildfire risk and conserve important wildlife habitats.

SPI is committed to the conservation and management of habitats of at-risk species such as the spotted owl. In 2017, we entered into an MOU agreement signed with USFS, CAL FIRE and National Fish and Wildlife Foundation to work together to plan and implement a series of fuel breaks in California to not only reduce wildfire risk but also to protect the habitat for northern and California spotted owls.¹ Since that was signed, other California industrial landowners and government partners have joined the MOU. SPI also has Habitat Conservation Plans and other federal species conservation agreements to help safeguard the habitats for spotted owls, Pacific fisher, salmon, marbled murrelets and a number of other species. In all of the agreements, there is a shared understanding of the importance of not only having a mix of age classes of forests, but also the importance of having healthy forests.

Please consider the following comments.

¹ <https://www.fs.usda.gov/detail/r5/news-events/?cid=FSEPRD555602>

The discussion of Old Growth is older than the U.S. Forest Service. John Muir discussed it in the August 1897 issue of *The Atlantic* before it had a name, and its definition has eluded us ever since. Our National Forests have captivated Americans, fueled our nation's growth and independence, provided unparalleled recreational opportunities and sparked controversy over the last 120 years. The importance of old forests, or any aged forest for that matter, led to the creation of the USFS at the turn of the century and the legal basis for managing our National Forests rests on four basic laws: Organic Act of 1897, Multiple Use Sustained Yield Act of 1960, Renewable Resources Planning Act of 1974, and the National Forest Management Act of 1976.

Since inception of the National Forest System, countless set-asides, off limits designations, wilderness areas, national monuments and roadless areas have been carved out to "protect" and conserve a long list of natural resource, cultural, and aesthetic values with old and/or mature forest values likely weighing into the decision. Of the 193 million acres managed by the USFS, approximately 98 million acres are "unreserved" (50%), but only 40 million acres remain designated as "suitable for timber production" (21%). The last significant set aside occurred in 2001 with the Clinton-era "Roadless Rule" (58.5 million acres). Since then, 37 million acres of National Forests have burned, hundreds of people have died, towns destroyed, and watersheds devastated.

The current Administration – like its predecessors since about the year 2000 – has taken notice of the effect that catastrophic fires have had on our national forests and surrounding timberlands and communities over the last 20 years, culminating in the recent release of the 10-Year Strategy called "Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America's Forests" (January 2022). The 10-Year Strategy is a big step in the right direction towards addressing the top priority: reducing the occurrence of Catastrophic Wildfire. Recent legislation such as the Bipartisan Infrastructure Law (Public Law 117-58) have provided historic new authorities and funding needed to carry out the 10-Year Strategy.

The Earth Day Executive Order 14072 is further admittance of the imminent threat of catastrophic wildfire, pointing to catastrophic wildfire, climate change, and fire exclusion as a "...pressing threat to mature and old-growth forests on Federal lands."

Question: How does a universal definition of Old-Growth and Mature Forests help advance the ball against the very real and imminent threat of catastrophic wildfire?

Answer: It doesn't.

Trying to develop a national old growth or mature forests national standard has the potential to undermine all the planning efforts that occur across the nation during forest planning efforts. Planning efforts are extremely transparent: involving everyone – environmental groups, forest industry, community leaders and many others. As a part of this planning process, the public has a chance to provide comments on all of the different land allocations (wilderness, Inventoried Roadless Area, Late Succession Reserves, Matrix) not to mention the legally-binding standards and guidelines.

Over the past decade, the USFS has significantly invested in the Collaborative Forest Landscape Restoration Program, which has proven successful at bringing diverse organizations and the interested public together to provide input and support project recommendations across numerous National Forests. Adopting a single, binding definition of "old-growth" and "mature" forests –would

be a considerable departure from this cooperative process and would cause a major setback to the positive collaboration that is occurring today.

Nearly every state that has National Forests has signed formal "Shared Stewardship" agreements that focus on reducing fuels, protecting communities, municipal watersheds, and Threatened and Endangered Species habitats. A single, national definition (or definition framework) of mature or old growth would likely disrupt important work being conducted under these Shared Stewardship Agreements. This commitment by the Agency and the States to work together and commit resources must not be taken lightly.

The Agency already works closely with the USFWS and NMFS to conduct consultation on numerous projects that involve the harvest of mature trees. Especially with the USFWS, efforts to preserve older forests are already taken into consideration for the protection of those forest conditions as a part of terms and conditions of the formal consultation process for those species, regardless of which part of the country they exist. A new national definition – which would inherently be less informed by local conditions – does not assist resource managers in implementing needed forest health and restoration work.

Conclusion:

The quest to define Old Growth and Mature Forests is over a century old and is a distraction from the task at hand: confronting catastrophic wildfire. Congress and the current Administration have been clear that confronting the wildfire challenge is a priority. This attempt to define old growth and mature forests with a standardized definition and subsequent inventory will waste time, money, resources, and delay – if not derail – the 10-Year Strategy and other important work to reduce risk of wildfire. If focus on the 10-Year Strategy is lost, these catastrophic fires will continue to destroy homes, property, forests and wildlife habitat, ruin our air quality and emit massive amounts of greenhouse gases.

Thank you for the opportunity to comment on the RFI. SPI will continue to be a prominent partner with the USFS and BLM to find solutions for the current forest health and wildfire crises and propose the following asks:

1. Avoid arbitrary definition limits and keep the process local, flexible, and transparent while complying with existing legal frameworks and mandates.
2. Use the EO and the 10-Year Strategy to unlock the climate mitigation potential of our national forests.
3. Improve Forest Inventory and Analysis Data.

Sincerely,



Robert Hoover
California Log Resources Manager