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Submitted electronically via email and upload at: [roy.barbour@usda.gov](mailto:roy.barbour@usda.gov) and <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

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Re: **Comments of the American Wood Council on the Request for Information on defining Federal Old-growth and Mature Forests [FR Doc. # 2022-15185]**

Dear Deputy Chief French, Director Stone-Manning, and Assistant Director Barbour:

The American Wood Council (“AWC”) appreciates the opportunity to provide these comments to inform the USDA’s and DOI’s joint effort to “define, identify, and complete an inventory of old-growth and mature forests on Federal lands” in accordance with Executive Order (“EO”) 14072: Strengthening the Nation’s Forests, Communities, and Local Economies as well as the related Secretary’s Memorandum 1077-004: Climate Resilience and Carbon Stewardship of America’s National Forests and Grasslands.

AWC welcomes the USDA’s and DOI’s effort to collect stakeholder input in developing policies to institutionalize sound, science-informed, management and conservation of old-growth and mature forests on Federal land. Forests deliver real climate benefits, such as producing and regulating water, forming and retaining soil, and regulating the atmospheric elements and climate. These forests also deliver socioeconomic benefits by supporting recreational opportunities, wood products industries, and good-paying rural jobs. Forests support the wood products industries because trees can be grown and harvested sustainably when managed through the judicious application of scientifically sound forestry practices that incorporate our understanding of tree growth, wildlife, geology, fire behavior, botany, hydrology, and fisheries that maintain an intact ecosystem.

It will be critical for agencies to carefully consider a comprehensive and balanced, science-based approach to the terms identified in the RFI in order to ensure that climate-smart management and conservation strategies for

mature and old-growth forests on Federal land incorporate and promote the important sustainability role played by both the forestry the wood products sectors. As the National Association of State Foresters put it in a recent policy statement, “a viable forest products sector is absolutely essential to performing the forest management activities that sustain the social, economic, and environmental benefits of forests nationwide and across all ownerships.”<sup>1</sup>

## **1. About the American Wood Council**

AWC is the voice of North American wood products manufacturing, an industry that provides over 450,000 men and women in the United States with family-wage jobs. AWC represents 86 percent of the structural wood products industry. Our members make products that are essential to everyday life that are derived from a renewable resource that absorbs and sequesters carbon for many decades. Our staff experts develop state-of-the-art engineering data, technology, and standards for wood products to ensure their safe and efficient design, as well as provide information on wood design, green building, and environmental regulations. AWC also advocates for balanced government policies that affect wood products.

## **2. Background and Context**

We appreciate that the USDA and DOI seek to gather feedback from stakeholders on potential implementation efforts associated with provisions in EO 14072. That Executive Order requires USDA and DOI to consider climate-smart stewardship of old-growth and mature forests; analyze threats to old-growth and mature forests on Federal lands, including from wildfires and climate change; and develop policies to institutionalize climate-smart management and conservation strategies that address threats to old-growth and mature forest on Federal land. In particular, the USDA and DOI have jointly asked the public to provide input on the development of a definition of old-growth and mature forests on Federal land, including a number of specific criteria to inform a universal definition framework for these terms. This effort comes from the Biden administration’s commitment to “deliver, by 2030, on collective global goals to end natural forest loss and to restore at least an additional 200 million hectares of forests and other ecosystems, while showcasing new economic models that reflect the services provided by critical ecosystems around the world.”

A healthy and vibrant value chain for wood construction materials and products is essential to achieving these collective goals and incubating these new economic models. While other construction materials have large GHG footprints and high embodied GHG emissions, wood products are both low in embodied carbon and store carbon that was sequestered in the forest, for the long term. Sustainable forestry practices dictate that the forests—from which harvested trees were transformed into low embodied energy and high carbon-storing building products—should be regrown to restore the natural ecosystem, consistent with administrative objectives for that tract of land. Thus, wood products have a large and important role to play in achieving the federal government’s net-zero target for all new buildings by 2030 and its overarching goal to achieve net-zero emissions across its entire building portfolio by 2045.

American wood products today represent an existing, proven pathway toward carbon reduction goals by supporting sustainable forestry management that sequesters carbon in forests, transforming trees into low embodied energy and high carbon-storing building products, which when used in construction, lower a buildings carbon footprint. By providing a market for harvested trees, the wood products industry provides a positive economic feedback loop to support forestry activities that help prevent high-intensity wildfires and that ensure that forest stocks are maintained for the long term. Markets for durable wood products positively reinforce the nation’s forest area and its capacity to sequester carbon that is ultimately stored in long-lived wood products.<sup>2</sup>

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<sup>1</sup> NASF, “Recommendations to Improve the Health and Sustainability of Federal Forest Resources,” September 2021.

<sup>2</sup> See generally [https://www.fpl.fs.fed.us/documnts/fplgtr/fplgtr282/chapter\\_01\\_fpl\\_gtr282.pdf](https://www.fpl.fs.fed.us/documnts/fplgtr/fplgtr282/chapter_01_fpl_gtr282.pdf).

Our comments below therefore emphasize the important considerations that USDA and DOI should take into account in establishing definitions and criteria for old-growth and mature forests, in order to ensure that the resource value of these forests is considered in a holistic way.

### **3. AWC Comments and Recommendations**

#### **a. Potential Consequences and Implications of this Definition-Setting Activity**

The USDA's and DOI's current development of a definitional framework for old-growth and mature forests, and its subsequent work to identify and inventory forests that meet these definitions, carry the potential for significant long-term implications for stakeholders throughout the forest products value chain.

Healthy forests store carbon, purify water and air, provide shelter and belonging to Indigenous peoples, and bestow refuge to wildlife. Well-managed forests are also essential components of a vibrant wood products sector that contributes to the Administration's climate-smart objectives. We are concerned that the adoption of new federal definitions will lead to a cascading set of required modifications to federal, state and local resource plans that could result in setbacks in fire resiliency planning and also impede long-term resource and harvest management plans that are critical to the value chain for climate-friendly forest products.

Relatedly, we are also concerned that the EO 14072 may have the unintended consequence of slowing the critical fuels reductions work needed at scale on federal lands within the Wildland Urban Interface. Many of these landscapes are fire-prone and burning at an alarming rate. Any benefit surrounding the protection of old-growth and mature forests is defeated when wildfires consume the landscape. Protecting old-growth in fire resistant or low risk forests is quite different than protecting old-growth in fire prone areas across the West. Recent losses to the Giant Sequoia in California is but one example. The federal government's approach to sustainably managing federal forestlands must consider how it may impact the wildfire susceptibility of old-growth and mature forests in high-risk, fire-prone areas.

A definition that is overbroad or insufficiently nuanced – e.g., one that overvalues easily quantified surrogate characteristics like age or size as a proxy for old-growth and mature forests, without taking into account variables such as site productivity, geography, and species variability and habitat complexity – might result in inadvertent constraints on the burgeoning but still nascent market for structural wood products, with significant social and economic implications.

Wood products, such as mass timber, structural wood products, and composite wood products compete with GHG-intensive materials and can store carbon for decades, reduce the overall greenhouse gas impacts of new building and major renovation construction, support rural economies, increase wildfire resiliency, and foster the growth of a nascent manufacturing sector in mass timber wood products. As demand for climate-smart building solutions grows, we need to promote policies that support these growing markets, and the sustainably managed forests that grow and regrow the trees from which low embodied, high carbon-storing building material is made.

Sustainably managed forests must continue to provide a resilient and renewable supply of material for long-lasting wood products and the climate benefits that they provide to society. AWC urges the USDA and DOI to consider the potential implications of an inadequate universal definition of "old growth and mature forests" that is not science-based, nuanced, and data-driven.

#### **b. Universal Definition**

As the USDA and DOI acknowledge, "old-growth forests differ widely in character with age, geographic location, climate, site productivity, and characteristic disturbance regime." The variability and complexity of site conditions, forest succession, and disturbance processes make defining old-growth difficult or impossible under

a single definition applicable to all forests across the US.<sup>3</sup> Consequently, AWC does not support a universal definition of old-growth and mature forests due to this variability and complexity.

EO 14072 directs the USDA and DOI 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 shall make such inventory publicly available.” (Emphasis added). The EO does not direct the USDA and DOI to adopt a universal definition for old-growth and mature forests. It instead expressly mandates that the USDA and DOI define these terms accounting for regional and ecological variations.

AWC believes that one science-based approach to this definitional framework would be to define old-growth forests based on the unique biophysical characteristics of each of the agency’s nine regions, with a suite of definitions or characteristics that account for the vast variation in old-growth forest character that occurs across North America.<sup>4</sup> Allowing each region of the Forest Service to have its own unique definition ensures the full incorporation of variation in the vegetation, species, canopy attributes, minimum patch or stand size, soil productivity, and disturbance history that have influenced the development of a tracts current state. Each of these criteria differ widely across different regions in different forest ecosystems.

For example, the Pacific Northwest General Technical Report discusses the scientific basis of the assumptions, management strategies, and goals of the Northwest Forest Plan (“NWFP”).<sup>5</sup> The NWFP defines old-growth forests based on “live and dead structure and tree species composition.”<sup>6</sup> The definition was based largely on stand developmental and successional patterns.<sup>7</sup> However, other regions employ definitional frameworks based on age and ecological function.<sup>8</sup> The overarching commonality in these definitional frameworks is that they were developed to apply specifically to the forest region where land managers and government regulators worked.

Regional definitions are more inclusive of ecosystem variability, and will therefore be more sensitive to and applicable to the essential conditions that will determine appropriate, science-based definitions, including distinctions among species, distinctions among geographies and growing conditions, and distinctions among forest management histories.

AWC strongly encourages the USDA and DOI to maintain a regional approach based on the most up-to-date research, data, and science, that fully accounts for each of these critical considerations, when defining old-growth and mature forests.

AWC expressly recommends that the USDA and DOI:

- Consider regional nuances;
- Use criteria that recognize variability in species, geographies and growing conditions, and historical and recent approaches to forest management;
- Avoid using a single definition or a one-size-fits-all;

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<sup>3</sup> See [https://www.fs.fed.us/pnw/pubs/pnw\\_gtr966\\_chapter3.pdf](https://www.fs.fed.us/pnw/pubs/pnw_gtr966_chapter3.pdf) and <https://www.fs.fed.us/pnw/pubs/science-update-4.pdf>.

<sup>4</sup> See generally <https://www.fs.usda.gov/managing-land/old-growth-forests>.

<sup>5</sup> See generally [https://www.fs.fed.us/pnw/pubs/pnw\\_gtr966\\_chapter3.pdf](https://www.fs.fed.us/pnw/pubs/pnw_gtr966_chapter3.pdf).

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> See, e.g., [https://www.dnr.state.mn.us/forests\\_types/oldgrowth/characteristics.html](https://www.dnr.state.mn.us/forests_types/oldgrowth/characteristics.html), <https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/old-growth-forests/old-growth-values>, <https://www.fs.usda.gov/treesearch/pubs/5511>, and <https://rewilding.org/eastern-old-growth-forests-then-and-now/>.

- Ensure that the criteria that are adopted takes full account of the potential implications on the forest products value chain to continue to deliver climate-smart solutions for carbon storage in building products, and not be a “strawman” for placing forest off-limits from sustainable forest management;
- Foster vibrant forest product markets that enhance the sustainability of America’s forests and forest-based communities;
- Strive to improve the health of federal forestlands prior to complicating the forest health crisis with a highly nuanced and complicated approach to preserve old growth.

#### **4. Conclusion**

AWC appreciates the opportunity to share our initial views promoting a regional approach to defining old-growth and mature forests. We also appreciate the opportunity to discuss the role that our sector can play in promoting a forestry and wood product manufacturing strategy that also benefits the U.S. economy. AWC and its member companies stand ready to engage as partners and stakeholders in the development and implementation of these policies as the agencies develop their approach to this complex and sensitive project. We look forward to the opportunity to engage further with USDA, DOI, and other Administration officials about the comments and suggestions above.

Sincerely,

Rachael Jamison  
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American Wood Council