



August 29th, 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

Thank you for the opportunity to respond to the Request for Information (RFI) mentioned above. Interfor is lumber manufacturer with locations throughout the United States and Canada. In the Pacific Northwest (Oregon and Washington), Interfor is purchaser of federal timber contracts and participates in local collaborative groups with the forest service and other stakeholders. Interfor cares deeply about the health and resiliency of our public lands and national forests. We strongly support the Biden Administration's ambitious goals of increasing the pace and scale of science-based, active forest management to reduce wildfire risk, protecting at-risk communities and vulnerable populations as well as to improve the health and resiliency of our federal forests.

As a partner that works on the ground with forest service personnel, we are concerned about diverting limited agency staff time and resources away from planning active forest management projects. Instead of focusing exclusively on attempts to "define and inventory" old-growth and mature forests, we recommend a more holistic and analytical approach to assist our agencies and public in better understanding the risks and opportunities on the landscape created by a rapidly changing climate. We recommend that the agencies utilize FIA data to disclose trends to land managers, policymakers, and the general public to inform future decision-making.

'Top down' approaches to forest management have failed to deliver promised conservation benefits and intended management goals on National Forests in the Western United States. The Northwest Forest Plan and the Eastside Screens are just two examples of prescriptive and inflexible federal forest policies that have made timely, science-based forest management more difficult and expensive to implement.

Interfor agrees with Chief Randy Moore's call for a "paradigm shift" in forest management. Pursuing the same tactics and approaches as the last quarter century will result in the same outcomes: catastrophic wildfires, toxic smoke and carbon emissions, and the destruction of our national forest resources and forested communities – and the continued loss of mature and old

growth forests. We recommend that the Forest Service find more ways to empower its dynamic workforce and leverage its extraordinary forestry expertise.

Thank you for this opportunity to comment on the RFI. I reiterate Interfor's commitment to working with the Forest Service and Bureau of Land Management to help address our nation's wildfire and forest health crisis.

Sincerely,

A handwritten signature in black ink that reads "Neil Kissler". The signature is written in a cursive, flowing style.

Neil Kissler
Procurement Forester
Interfor U.S. Timber Inc.
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Molalla, OR 97038