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Submitted via comments submission portal at [www.usda.gov](http://www.usda.gov)  
Docket No. 2022-15185

August 30, 2022

Jamie Barbour  
Assistant Director, Ecosystem Management Coordination  
U.S. Forest Service  
Attn: Document Number 2022-15185  
1400 Independence Ave., SW  
Washington, D.C. 20250

**Re: *Request for Information (RFI) on Federal Old-growth and Mature Forests 87 Fed. Reg. 42493 (July 15, 2022), Doc Number 2022-15185***

Dear Mr. Barbour:

Thank you for the opportunity to respond to the Request for Information (RFI) captioned above. Collins is a 167-year-old, family-owned, FSC-certified forest management and forest products company. We manage 370,000 acres of forestland across Pennsylvania, Oregon, and California. We also operate two softwood sawmills and one hardwood sawmill, as well as hardboard siding and particleboard facilities. These operations are economic engines of the rural communities where we operate, and are essential partners of our neighboring national forests. We are particularly proud of our collaboration with the Fremont-Winema, Modoc, Lassen, and Plumas National Forests, where we work to ensure landscape-scale resiliency and health.

In addition to the comments below, we fully endorse and adopt comments provided by the National Alliance of Forest Owners (NAFO) and the American Forest Resource Council (AFRC), regarding the Proposed Rule, and do not repeat them here.

Collins is providing three primary comments and suggestions:

- 1) Collins operates in a variety of forest types across the country, including, in the east, Allegheny hardwoods and, in the west, Sierran mixed conifer and eastside pine forests. In the west, we primarily practice uneven-aged management, which yields a variety of age classes from saplings to mature trees. This experience has shown us that the conception of what should be considered old-growth or mature varies greatly based on the context and history of the local forest. Therefore, old-growth definitions should not be national, blanket criteria, but should consider forest and regional differences in maturity.
- 2) In 2021, Collins had 54,000 acres burn in the Dixie Fire in California and 24,000 acres burn in the Cougar Peak Fire in Oregon. Wildfire has no regard for property lines, national forest boundaries, nor state borders. We have experienced first-hand that the biggest threat to old-growth and mature forests is destruction by wildfire and climate stresses. Wildfires are growing in duration, size, and

intensity from a combination of overstocked, hazardous fuels on many national forests and climate-driven extremes in wind and temperature. The conclusion forest managers and leading researchers<sup>1</sup><sup>2</sup> are coming to is that there is a need for more treatment on the Region's remaining green forests to reduce the fuel loading that leads to and intensifies catastrophic fires and attendant losses. Efforts to catalogue and set aside old-growth and mature forests must not undermine efforts to reduce overstocking and improve resiliency on federal forestland. Forest treatments are equally if not more important to the goal of preserving mature forest stands from wildfire and climate change impacts.

- 3) If the Forest Service is to devote resources to study of old-growth and mature tree inventory, it should be an all-encompassing inventory that accounts for all growing stock across the growth spectrum. This will still capture the mature trees and will also establish inventory and stocking/growth baselines for needed federal forest harvest levels. This effort should be used to give forest supervisors *all* the tools they need to do their job.

Thank you for this opportunity to comment on the RFI. We all bear a responsibility to care for the lands and forests we rely on for our air, water, and livelihoods. Collins remains committed to collaboration with our neighbors and partners as we all strive to improve the health and resiliency of the landscape.

Please contact me with any questions.

Sincerely,



Galen Collins Smith  
Vice President of Resources

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<sup>1</sup> Hessburg, P. F., S. J. Prichard, R. K. Hagmann, N. A. Povak, and F. K. Lake. 2021. Wildfire and climate change adaptation of western North American forests: a case for intentional management. *Ecological Applications* 00(00):e02432. 10.1002/eap.2432

<sup>2</sup> Malcolm P. North, Ryan E. Tompkins, Alexis A. Bernal, Brandon M. Collins, Scott L. Stephens, Robert A. York. Operational resilience in western US frequent-fire forests. *Forest Ecology and Management*, 2022; 507: 120004 DOI: 10.1016/j.foreco.2021.120004