



P.O. Box 310 • Medford, Oregon 97501 • (541) 773-5329

August 22, 2022

US Forest Service
US Bureau of Land Management
Via <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

Dear Federal Lands Administrators,

Thank you for the opportunity to comment on the definition of old growth and mature forests on federal lands as part of the Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. These comments are submitted on behalf of the Southern Oregon Timber Industries Association (SOTIA). SOTIA promotes healthy forests and forest related industries through responsible management of public and private forests that sustain timber, wildlife, recreation and scenic beauty for the citizens of the area. Members of SOTIA are located in Curry, Jackson, Josephine, and Klamath Counties in Oregon as well as Siskiyou County California where they have various roles in the growing, harvesting, and manufacturing of wood products. In this area there are nearly 10,000 people employed in forest products related industries.

SOTIA and its members become very anxious when initiatives arise concerning old growth and mature forests. Historically these initiatives have led to restrictions on timber availability for producers of wood products. These producers should be seen as partners in combating climate change as they provide sustainable building products from renewable forests. Instead, initiatives such as this will further limit timber supply and reduce the number of forest products producers. This at a time when the nation is demanding wood products. That demand will have to be satisfied from countries which have less concern about climate change than the US.

Defining old growth and mature forests is a difficult task, which is why this topic has been reoccurring for nearly forty years. Old growth is often determined in the eyes of the beholder. Some people will say it is just big trees, but that definition is too simple for federal policy. It does not recognize the habitat and diverse structure that old growth should require. It also does not recognize that Federal forests are to provide multiple uses, including timber.

Old growth stands and the related functions are recognized when observed in forests. The structure and habitat associated with older stands is recognizable by those experienced in managing forests. The ecoregion will dictate the age, density and structure required to provide the functions desired within the region. Those structures and the age of the trees will vary significantly by the ecoregion in which they grow. Ecoregions are quite diverse across Federal lands and therefore old growth definitions should address that diversity or will be too broad to matter.

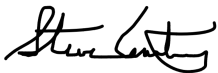
In the past, defining old growth occurred to define habitat often found in older forests. With many years of these exercises old growth and related habitat are well understood. Reviewing those studies through the lens of climate impacts should not be a political exercise as this process appears to be. Stands of older trees have been inventoried in past exercises allowing agencies to determine the carbon currently stored as well as the potential for future storage.

Once past inventories of old growth are reviewed with climate impacts in mind, the question becomes how to treat those stands in the future. As has been illustrated repeatedly in the West, the biggest threat to old growth is wildfire. These fires emit a tremendous amount of greenhouse gasses, particularly when burning older stands. The problem is exacerbated by the fact that most federal lands have been excluded from management to help reduce the impacts of fire. So, identifying old and mature stands is only part of the issue when trying to mitigate climate issues. What to do so those stands do not add to climate issues needs to be addressed as well.

Forest management to reduce fuels has shown to be effective to help retain older stands across the West. As older stands are delineated, management that can help protect them should be identified and implemented as well. Otherwise, this exercise is futile because when it comes to fire in these stands, it's not a matter of if, but when.

The Southern Oregon Timber Industries Association is very interested in the processes necessary to implement the Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. This order speaks about partnering with many entities including private entities such as SOTIA and its members. We hope that all those opportunities for partnership are explored as SOTIA members are well versed in forest management techniques that will help reduce the threat of fire to our Nation's forests. They also have the facilities to benefit local communities and economies. We look forward to how this process will be implemented after the definition to old growth is decided.

Sincerely,



Steve Courtney
Executive Vice President
Southern Oregon Timber Industry Association