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August 30, 2022

Submitted via: <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

RE: Executive Order 14072 Request for Information

Dear Mr. French and Ms. Stone-Manning:

On behalf of Idaho Forest Group (IFG), we submit the following comments in response to the Request for Information (RFI) on Executive Order 14072 Section 2(b) stating that you will “within one year of the date of this order, 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”.

IFG is one of the larger producers of softwood lumber in the U.S. with six manufacturing facilities in Idaho and Mississippi capable of producing well over 1 billion board feet of lumber annually. A large portion of our raw material supply for our Idaho operations comes from Regions 1, 4 and 6 of the U.S. Forest Service. Our 2,000+ employees, contractors, and other service providers live and work in the mostly small, rural communities surrounding our facilities where forestry as well as recreation and tourism are significant components of the economy and influence their quality of life. Likewise, the negative effects of wildfire and the current forest health crisis resulting from the lack of active management on public lands has a very real impact on the overall health and vibrancy of local communities.

We highly recommend deferring to the expertise of your own *local* professionals to define and identify old growth and mature forests in dynamic and complex ecological forest systems. This would allow for management and reallocation as conditions change as well as adaptation to climate change, wildfire, and other factors that will alter the occurrence and placement of forests with true old growth structural characteristics that benefit wildlife. Responding to pressure from groups to “define old growth” or create a universal definition framework will undoubtedly lead to arbitrary policies that limit the ability of federal agencies to manage the resource and will ultimately reduce the amount of old growth on the landscape over time, particularly in disturbance-driven ecosystems. We believe that E.O. 14072 doesn’t fully recognize current forest conditions, the ecological role and succession of mature forests, or suitable timber designations and harvest levels on Federal lands. We are also concerned that the E.O. runs counter to the Administration’s goals articulated in the “Confronting the Wildfire Crisis Strategy”.

Additional points for consideration include:

- Most Federal forests are already off-limits to active forest management.
- There is an abundance of place-based and peer-reviewed scientific literature that defines the appropriate range of late successional stage structural conditions needed to sustain habitat important for old growth dependent wildlife species.
- According to the U.S. Department of Agriculture’s Resource Update FS-227, there are currently 9 western states whose forestlands are net carbon emitters including Arizona, Colorado, Idaho, Montana, Nevada, New Mexico, South Dakota, Utah, and Wyoming due to high mortality from overcrowding and



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- insect and disease issues, declining forest productivity, and wildfire.
- A national definition or universal definition framework for old growth and mature forests will limit Federal agency's ability to respond to wildfire or climate change quickly or at a meaningful scale.

Local forest plans and project-level NEPA analyses, among other existing protections and regulations, adequately protect the unique characteristics of old growth forest types and allow for better active and passive management techniques that will promote the development of mature and old-growth forests over time. Local forest units are capable of, and have, identified and inventoried stands exhibiting valuable old growth characteristics as well as stands that are healthy enough to achieve mature successional status in the future. The current forest health and wildfire crisis demands immediate attention of Federal personnel and partners alike. We encourage you to prioritize work aimed at addressing these threats to our forests, wildlife, and the communities that depend on them.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Tom Schultz". The signature is written in a cursive style and is positioned above a horizontal dashed line.

Tom Schultz  
Vice President of Resources and Government Affairs