

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



August 30, 2022

Submitted electronically via USDA portal

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

Dear Mr. Barbour:

The Forest Landowners Association (FLA) appreciates the opportunity to submit the following comments on the *Request for Information (RFI) on Federal Old-growth and Mature Forests*, 87 Fed. Reg. 42493 (July 15, 2022), published by the U.S. Forest Service and the Bureau of Land Management (“the Agencies”) in response to Executive Order 14072, 87 Fed. Reg. 24851 (April 27, 2022).

The Forest Landowners Association (FLA) is an association of landowners who are the stewards of America’s private forests. FLA represents private forestland stakeholders who own and manage over 55 million acres nationwide – from large, multi-generational forest businesses to individual family landowners who view their forest as a long-term investment. Our members manage their land with a sustainable approach to ensure the prosperity of their forests for future generations. FLA is committed to preserving America’s tradition of private forest ownership, promoting the importance of forest resources and sustainable forest management, and securing a legacy that can be passed to the next generation.

Private forest landowners drive sustainable forestry across the U.S., providing 90% of the nation’s wood supply and bolstering rural communities while simultaneously providing vast environmental benefits such as clean air, clean water, and healthy wildlife habitat. These landowners are committed to the long-term stewardship and productivity of their forest resources, and their connection and dedication to the land creates well-managed and resilient forests across the landscape.

While we appreciate the cultural significance and recreational value attributed to old growth and mature forests on federal lands, they are distinct from the working forests owned and managed by America’s private forest landowners. The continuous cycle of sustainable growth, management, harvest, and replanting on private lands creates a mosaic of forests at various age and size classes, which is vital to maintaining a resilient forest ecosystem that efficiently sequesters carbon, mitigates the impacts of fire, and provides vital habitat for at-risk and listed species. **Any definition framework or approach created to advance policy and climate objectives on federal lands should not be applied to private working forestland.**

## **Comments**

### **1. There is no one-size-fits-all approach to defining old growth and mature forests.**

The Agencies and scientific communities have struggled with creating a singular definition of old growth and mature forests in the past. Old growth and mature forests vary greatly in size and age across each region, and what is considered a mature forest in the Southeast is certainly not a mature forest in the Pacific Northwest. Even within each region the classification of old growth may vary. Because of the complex nature of forest ecosystems, there is no one-size-fits-all approach to defining old growth and mature forests, and the RFI appropriately recognizes that “today, most scientists agree that old-growth forests differ widely in character with age, geographic location, climate, site productivity, and characteristic disturbance regime”.

We urge the Agencies to instead develop a basic framework for determining old growth and mature forests that will guide determinations on federal lands at a local level. This framework should be broad and flexible enough to account for vast regional differences and should identify characteristics of the forest as a whole rather than focusing on individual trees.

Additionally, any determination of old growth should not be static – landscapes are constantly evolving, and a definition framework should account for changes on the landscape due to fire, climate, disease, and other threats to forest ecosystems.

Mature forests are even more variable and determining if a forest is “mature” for the purposes of policy should also focus on unique forest conditions rather than simply encompassing all forests with closed canopy stands.

### **2. Conserving old growth forests should protect local communities.**

Private landowners have long utilized active management to create diverse forest age and structure and remove hazardous fuels, resulting in healthy and resilient working forestland. However, fire and disease do not adhere to ownership boundaries, and conditions on federal lands can quickly impact private lands. After a century of fire suppression on federal lands, the agencies should not discount the benefits of active forest management to ensure the resiliency of old growth and mature forests in a way that will protect surrounding communities.

By managing old growth and mature forests, the Agencies can mitigate the primary threats to these forests – catastrophic wildfires, insect infestation, disease, and other climate impacts – while protecting the surrounding communities from the same threats. Private landowners are ready and willing to collaborate with the Agencies to ensure these threats, specifically the threat of wildfire, are addressed.

### **3. The definition framework of old growth and mature forests is meant only for federal lands.**

As previously stated in these comments, private forests grown and managed for wood markets are distinctly different than old growth and mature forests on federal lands. The cycle of growing, managing, harvesting, and replanting or naturally regenerating trees is key for the environmental and economic success of private forests, and working forest landowners follow a management plan created to maintain the health, biodiversity, and economic potential of their forests.

There is a common misconception that logging is a major threat to old growth and mature trees in the United States. Harvest only occurs on less than 2% of U.S. forestland each year, and the majority of that harvest takes place on private lands specifically grown and managed for wood markets. However, activists may leverage federal definitions of old growth and mature forests to restrict harvest on private lands.

Any definition framework for old growth and mature forests should not only state that it is intended for federal land, but also explicitly state that it does not apply to private lands. By clarifying that this definition is not designed or appropriate for use outside of public lands, the Agencies will protect the ability of private landowners to keep their working forests working.

## **Conclusion**

There is no one-size-fits-all approach to defining old growth. We encourage the Agencies to create a definition framework for old growth and mature forests that is broad enough to account for complex forest ecosystems and changes in the landscape over time, and can be applied at a local level. Old growth and mature forests on federal lands are distinct from private forests. We urge the Agencies to explicitly acknowledge that any definition framework of old growth and mature forests is intended only for use on federal lands and is not appropriate or applicable to private lands. Lastly, we ask that the Agencies consider beneficial management of old growth and mature forests to protect surrounding communities.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Moss". The signature is fluid and cursive, with the first name "Katie" being more prominent than the last name "Moss".

Katie Moss  
Government Affairs Coordinator  
Forest Landowners Association