



SIERRA PACIFIC INDUSTRIES

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Submitted Electronically

January 30, 2024

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Subject: Land Management Plan Direction for Old Growth Forest Conditions Across the National Forest System, Notice of Intent to Prepare an Environmental Impact Statement (2023 Federal Register Vol. 88, No. 243, 88042-88048)

Dear Director:

Per 88 FR 88042¹ Sierra Pacific Industries (SPI) respectfully submits this comment letter to the U.S. Forest Service (USFS) regarding the *Land Management Plan Direction for Old Growth Forest Conditions Across the National Forest System #65356*. SPI also supports the comments submitted by the Federal Forest Resource Coalition.

SPI is a third-generation family-owned forest products company employing over 6,000 people in rural communities at scattered locations across the U.S. We sustainably manage 2.4 million acres of our own forestlands in the West and are the third largest U.S. lumber producer. Our American-made products also include millwork, windows and doors, and renewable energy.

We share a long partnership with local, state, and federal agencies including the USFS and Bureau of Land Management (BLM), having successfully completed hundreds of timber sale contracts and stewardship projects throughout California, Oregon, and Washington. SPI's skilled workforce and resource professionals, processing facilities, and network of independent logging and hauling contractors are vital components to achieving USFS and BLM sustainable forest management, forest health and wildfire resiliency goals.

SPI is committed to sustainable, long-term stewardship of our lands and partnerships with federal agencies to help conserve important wildlife habitats, water and air quality, and recreation. We operate under several federal wildlife conservation agreements for the safeguarding of habitat for listed and at-risk species.

We are also committed to reduce the risk of catastrophic wildfire. We have formalized a MOU with USFS, CAL FIRE, National Fish and Wildlife Foundation, neighboring property owners and several other signatories for a jointly planned and implemented fuel break network in California to provide for wildfire risk reduction and habitat protection. We are also providing technical assistance to USFS staff and helping reforest federal lands impacted by recent wildfires through a stewardship agreement with the El Dorado National Forest. A theme woven through these local, state and federally recognized agreements is SPI's commitment to maintain healthy forests.

Regarding the Notice of Intent¹, we submit the following comments for consideration during scoping for the Environmental Impact Statement supporting amendments to land management plans for units of the National Forest System:

First, we commend the USFS and their efforts for executing the *Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies* (Executive Order 14072)² while implementing the strategies^{3,4} and actions to pursue science-based, sustainable forest and land management. The need to increase efforts that reduce wildfire risk, accelerate post-fire reforestation, restore ecosystems, and support forest products jobs and markets in rural communities is long overdue. Increasing these efforts is critical to addressing climate resiliency and associated risks.

We also understand the efforts and inherent complexities associated with portions of Executive Order 14072 relating to defining and inventorying old growth on federally managed lands. With 128 units in the National Forest System across our biologically and geologically diverse nation, providing such definitions is a difficult step towards planning climate-informed strategies.

Our forests are dynamic systems that change over time. Executive directives^{2,5} mandate the USFS and BLM identify forest conditions sustainable under 21st century conditions. Increasing threats to our forests in these 21st century conditions include insects, disease, wildfire risk, and drought. All these risk factors have a common factor that can combat them — actively managing the density of the vegetation on the ground to allow for and maintain healthy forest conditions.

Catastrophic wildfire and other events are threatening the health of our nation's forests, including old growth, along with the safety and health of neighboring communities. The passive forest management over recent decades, serving functionally as preservation in some cases, has exacerbated these threats and is unsustainable under 21st century conditions.

The U.S. Fish & Wildlife Service has recognized that fire is a huge threat to the threatened and endangered species which rely on late successional or old growth forests. The USFS must protect these habitats through management. Recent private lands habitat conservation plans are demonstrating how the required old forest characteristics can be woven into management activities in ways that protect the species as well as increase the resiliency of the forest to wildfire threats.

Over the last century national forests have sequestered significant amounts of our nation's annual greenhouse gas emissions by storing carbon in the forest and the wood products derived from them. With the national forests' total carbon sequestration slowing, more can and should be done: Restoring our forests to ensure they are increasing their ability to sequester and store carbon, rather than release it through catastrophic wildfire, and producing wood products for additional long-term carbon storage. This restoration is critical to maintain and manage forest resiliency under future conditions.

Threats to old growth on federal lands include wildfires, insects and disease, drought, invasive species, and other 21st century stressors such as increased human use and interaction are established and well documented. Decades of fire exclusion and passive management has allowed many forests to develop high fuels and stocking levels placing them at high risk for catastrophic loss from high-intensity wildfire, severe insect epidemics,

and unnatural shifts in forest species composition. Wildfire risk reduction strategies must focus on active management and stewardship strategies to restore and maintain resilient and sustainable conditions into the future.

The Forest Plans should focus on active management and stewardship solutions addressing these issues and make our forests healthier and more resilient. Solutions should focus on improving forest health and making our forests more resistant to wildfires, insects, and disease by reducing forest density to improve the health and resilience of the remaining stand on acres outside of already established reserves.

The USFS should reconsider the current proposal to amend 128 Forest Plans through a single EIS developed in less than one year. This approach undermines public trust and confidence. A one-size-fits-all, top-down approach to managing our nation's 128 unique National Forests is in direct opposition to a collaborative local approach that the USFS has encouraged over the last 20 years.

SPI appreciates the opportunity to provide comments on this Notice and proposed nationwide plan amendment. Instead of moving forward on pursuing a nationwide forest plan amendment, we urge the USFS to continue addressing old growth issues through the local, coordinated planning process.

Regards,



Robert Hoover
Sierra Pacific Industries
Vice President, Resources

References

¹88 FR 88042. 2023. *Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System. Federal Register 88(243): 88042–88048.*

²*Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. Executive Order 14072. April 22, 2022. The White House, Washington DC.*

³*Confronting the Wildfire Crisis. A Strategy for Protecting Communities and Improving Resilience in America's Forests. USFS, FS-1187a. January 2022.*

⁴*National Forest System Reforestation Strategy, Growing and Nurturing Resilient Forests. USFS, FS-1198. July 2022.*

⁵*Secretary's Memorandum 1077-004. Climate Resilience and Carbon Stewardship of America's National Forests and Grasslands. June 23, 2022. U.S. Department of Agriculture, Office of the Secretary, Washington DC 20250.*