



## MISSOURI FARM BUREAU FEDERATION

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February 2, 2024

Ms. Linda Walker  
Acting Director  
Ecosystem Management Coordination  
U.S. Forest Service  
201 14<sup>th</sup> Street SW, Mailstop 1108  
Washington, DC 20250-1124

*Submitted via webform*

### **RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System; Federal Register Vol. 88, No. 243 88042-88048**

Dear Acting Director Walker:

Missouri Farm Bureau (MOFB) appreciates the opportunity to submit comments on the U.S. Forest Service's notice of intent (NOI) to prepare an environmental impact statement (EIS) to amend all land management plans for units of the National Forest System, encompassing 128 plans in total. Founded in 1915, MOFB is Missouri's largest general farm organization, representing over 153,000 member families. Missouri is also home to the Mark Twain National Forest, encompassing 1.5 million acres of public land.

MOFB is concerned about the Forest Service's proposal, authored in response to President Biden's April 2022 Executive Order 14072, which will attempt to amend 2,700 land management plan components. For this process to be remotely successful, the Forest Service must use utilize information and receive input from the local level, especially from our members involved in timber harvest and grazing within the Mark Twain National Forest's boundaries, as well as those who own or manage nearby farms, ranches or forests. Local landowners and land managers must be consulted as the Forest Service attempts to craft a "consistent approach to manage for old-growth forest conditions."<sup>1</sup>

On the surface, the NOI appears as an attempt to restrict timber harvest in old-growth areas, which could negatively impact revenues received by public schools in the Mark Twain region, encompassing 29 Missouri counties.<sup>2</sup> MOFB is concerned that the NOI contains no sideboards to limit the number of acres to be managed for old-growth recruitment. Our members deserve to know what the Forest Service's NOI means through its stated goal "to maintain and improve amounts and distributions of old-growth forest conditions..."<sup>3</sup> From the current old-growth

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<sup>1</sup> USDA Forest Service Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, 88. Fed. Reg. 88043 (Dec. 20. 2023).

<sup>2</sup> [Secure Rural Schools Program, Final Title I, II, and III Report PNF \(ASR-18-01\), as of Sept 30, 2022 \(usda.gov\)](#), accessed Jan. 31, 2024.

<sup>3</sup> USDA Forest Service Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, 88. Fed. Reg. 88045 (Dec. 20. 2023).

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inventory of 24.7 million acres or 17 percent of forest conditions,<sup>4</sup> what are the Forest Service's goals? Is it to expand old-growth inventory to 25, 40 or even 50 percent? The NOI is not clear, and stakeholders should be provided with more information going forward.

Interestingly, the NOI discusses a threat analysis the Forest Service conducted for inventoried mature and old-growth forests on lands within its jurisdiction, stating: "the analysis found that tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects and disease."<sup>5</sup> The same analysis also found that "mortality from wildfires is currently the leading threat to mature and old-growth forest conditions, followed by insects and disease."<sup>6</sup> MOFB believes that the Forest Service's proposal to leave more timber stands to age and experience natural disturbance will only compound these threats and is short-sighted and counterproductive, at best.

To address these threats, MOFB's member-adopted policy supports continued efforts to reduce the threat of wildfires by using sound science and management techniques, such as prescribed burns and selective logging to decrease high fuel loads. We also encourage the utilization of cultural management practices such as Forest Stand Improvement thinning, particularly in conjunction with timber harvest, to continuously improve the long-term species composition, quality and productivity of the forest resource. In addition, we believe the Forest Service should concentrate its resources on addressing oak decline, which will optimize forest health and sustainability, while increasing rural economic growth.

In conclusion, MOFB encourages the Forest Service to continue to address old-growth forest issues through the locally-led planning process and management of stocking levels appropriate for each forest type rather than pursuing the process outlined in the NOI. Again, thank you for the opportunity to comment. Should you have any and questions or comments, please do not hesitate to contact Dan Engemann, MOFB Director of Regulatory Affairs, at: [dan.engemann@mofb.org](mailto:dan.engemann@mofb.org) or (573) 893-1409.

Respectfully,



Garrett Hawkins  
President

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<sup>4</sup> Ibid., p. 88043.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.