



**Submitted via comments submission portal at [www.usda.gov](http://www.usda.gov)  
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February 2, 2024

Ms. Linda Walker  
201 14th Street SW  
Mailstop 1108  
Washington, DC 20250-1124

***Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the  
National Forest System***

Dear Ms. Walker,

The Southeastern Lumber Manufacturers Association (SLMA) appreciates the opportunity to comment on the US Department of Agriculture's (USDA) proposed rule for amending all land management plans for units of the National Forest System to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition across planning areas of the National Forest System. While we appreciate the Agency's efforts to address forest management practices on federal lands, we are concerned that this rule as proposed may impact private forest management and markets for fiber supply that create strong, healthy markets for US-sourced wood products. Any further promulgation of this rule must ensure it does not prohibit the ability for domestic wood products manufacturers to provide a source of sustainably harvested fiber for its products and promote coordination of public-private partnerships for forest management practices.

### **About Southeastern Lumber Manufacturers Association**

The Southeastern Lumber Manufacturers Association membership spans from Texas to Maryland and includes sawmills, lumber treaters, and lumber remanufacturers. In total, SLMA serves 90 member companies across 130 locations and directly employs more than 13,000 people, along with the hundreds of thousands of secondary jobs from the wood products industry. Our member companies produce solid-sawn lumber from private, sustainably managed forests for a variety of residential and commercial applications. Our industry is at the forefront of good-paying jobs in rural markets, providing key economic opportunities, contributing significantly to our nation's domestic manufacturing operations, all while creating products that have unique positive carbon attributes. As a leading voice for the wood products industry on Capitol Hill, SLMA engages Congress and the Administration on issues and priorities that impact forestry and forest products. The association has developed excellent bipartisan

relationships with leadership and members of pertinent committees that impact our member companies and industry.

## **The ‘Purpose of Amendment Statement’ Opens the Door for Uncertainty, Unintended Consequences**

While the ‘Purpose of Amendment’ seemingly has positive intentions for forest health, we are concerned about the vagueness of the language as it relates to environmental stressors, particularly the following:

*and expanding their abundance and distribution and protecting them from the increasing threats posed by climate change, wildfire, insects and disease, encroachment pressures from urban development, and other potential stressors*

Many environmental groups continue to push for regulatory and legislative policies that promote public and private forests to remain “untouched,” often mislabeling healthy forest management for deforestation. Working forests, on the other hand, refer to forests that are actively managed using the best available science, without permanent conversion to another land use. Often, these forests are put into a harvest rotation and allowed to regenerate until they are mature again (decades later). Educated and trained foresters use specific silvicultural management practices to create a healthy and diverse forest community. Common forest management prescriptions might include clear-cutting or thinning, which depend on the specific use of the timber present.<sup>1</sup> Furthermore, forests of different ages play different roles in removing carbon from the atmosphere and storing it in wood; young forests grow rapidly, removing much more CO<sub>2</sub> each year from the atmosphere than an older forest covering the same area. Old forests store more carbon but sequester it much more slowly than younger managed forests. As old trees die or are lost to insects, storms, or fire, they release their carbon back to the atmosphere.<sup>2</sup>

While USDA is a vital partner for private forest landowners and wood product manufacturers, we are concerned that some in the Administration would propose to adopt policies that do not promote the necessary practices for working forests, and such language as proposed would leave open that interpretation. As wildfires continue to strengthen in their ferocity and intensity, it is vital that we understand the relationship between fire suppression tactics on public and private lands. In a 2021 study, the National Health Institute’s (NIH) National Library of Medicine (NLM) and National Center for Biotechnology Information (NCBI) analyzed wildfire events in the Pacific Northwest from 1984 to 2018 to explore how area burned responded to ownership, asking whether particular ownerships burned disproportionately more or less, and whether these patterns varied by forest and grass/shrub vegetation types. In the study, it found that:

*While many individual fires showed indifference to property lines, taken as a whole, we found patterns of disproportionate burning for both forest and grass/shrub fires. We found that forest fires avoided ownerships with a concentration of highly valued resources—burning less than expected in managed US*

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<sup>1</sup> Lisson, Ryan. *Forest Management is Not Deforestation*, 2020. *Ruffed Grouse Society, American Woodcock Society*. <https://ruffedgrousesociety.org/forest-management-is-not-deforestation/>

<sup>2</sup> McKinley, D.C., Ryan, M.G., Birdsey, R.A., Giardina, C.P., Harmon, M.E., Heath, L.S., Houghton, R.A., Jackson, R.B., Morrison, J.F., Murray, B.C., Pataki, D.E., and Skog, K.E. 2011. A synthesis of current knowledge on forests and carbon storage in the United States. *Ecological Applications* 21:1902-1924. <https://doi.org/10.1890/10-0697.1>.

*Forest Service forested lands, private non-industrial, private industrial, and state lands—suggesting the enforcement of strong fire protection policies. US Forest Service wilderness was the only ownership classification that burned more than expected which may result from the management of natural ignitions for resource objectives, its remoteness or both. Results from this study are relevant to inform perspectives on land management among public and private entities, which may share boundaries but not fire management goals, and support effective cross-boundary collaboration and shared stewardship across all-lands.*<sup>3</sup>

Although this conclusion is representative of one study, it further highlights the potential unintended consequences of public lands management that remains unmanaged for whatever reason. Such language in the proposed amendment could have profound implications on the health of our public and private lands without further specification on such management plans.

### **The Proposal’s Climate Language Must Recognize the Economic and Environmental Positives of a Healthy Wood Products Market**

A healthy and vibrant value chain for wood construction materials and products is essential to achieving the suite of goals identified in Executive Order 14072, *Strengthening the Nation’s Forests, Communities, and Local Economies* and the Secretary of Agriculture Tom Vilsack’s Memo 1077–044, *Climate Resilience and Carbon Stewardship of America’s National Forests and Grasslands*. While other construction materials have high embodied GHG emissions, wood products are low in embodied carbon and store carbon sequestered in the forest, locking it in through the life of a wood product. Sustainable forestry practices dictate that the forests—from which harvested trees are transformed into low embodied carbon and high carbon-storing building products—should be regrown to maintain the natural ecosystem, consistent with administrative objectives for that tract of land.

At this very moment, American wood products in the Southeast represent an existing, proven pathway toward sustainable forest management. By supporting a market for harvested trees, the wood products industry provides a positive economic feedback loop to support forestry activities that help prevent high-intensity wildfires and ensure that forest stocks are maintained for the long term. Additionally, a vibrant market for wood fiber and domestically manufactured wood products supports vital rural economies throughout the Southeast, many of which are the backbone of local communities.

The recommendations provided by our industry and its partners can only be considered in the context of our strong assertion that growing markets for US wood products is a central component to any approach to forest-based climate resilience in the United States. As demonstrated by USDA’s own data, strong markets for forest products have been the crux in keeping our nation’s forests healthy, resilient, and preventing their conversion to non-forest uses for the past half century.

### **A ‘One Size Fits All’ Management Plans Do Not Yield Healthy, Resilient Forests and Products**

SLMA is concerned that the proposed amendment could further exacerbate and advocate for “one size fits all” forest management plans. According to USDA’s [Mature and Old Growth Forest Report](#), the initial inventory identified more than 32 million acres of old-growth and around 80 million acres of mature forest across 200 types of forests. Any further promulgation or solicitation for implementation of this rule must coincide with Forest Action Plans, which offer practical and comprehensive roadmaps for investing

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<sup>3</sup> Barros AMG, Day MA, Spies TA, Ager AA. *Effects of ownership patterns on cross-boundary wildfires*. Sci Rep. 2021 Sep 29;11(1):19319. doi: 10.1038/s41598-021-98730-1. PMID: 34588539; PMCID: [PMC8481543](#).

federal, state, local, and private resources where they can be most effective in achieving shared conservation goals.<sup>4</sup> These plans are a major piece for understanding that forests across the US are unique and face their own challenges to successful management practices. Without this coordination, we are left with the potential for uncertainty and potentially devastating consequences.

## **Conclusion**

SLMA shares the Administration's goal for healthy forests and robust markets for the products they produce. Any further solicitation, development or implementation of this rule as proposed must ensure recognition of a healthy US wood products markets, coordination with States on Forest Action Plans, and provide clearer language that advocates for already-proven management practices to combat wildfire, insect, and disease. We are appreciative of this opportunity to comment and look forward to further coordination on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "B Smalley". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bryan Smalley  
President  
Southeastern Lumber Manufacturers Association

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<sup>4</sup> Forman-Cook, Whitney. *A NEW ERA DAWNS IN COORDINATED FOREST MANAGEMENT AS STATES UNVEIL 2020 FOREST ACTION PLANS*, 2021. *National Association of State Foresters*.  
<https://www.stateforesters.org/2021/01/07/a-new-era-dawns-in-coordinated-forest-management-as-states-unveil-2020-forest-action-plans/>