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Jennifer McRae
U.S. Forest Service
Attn: Document Number 65356
1400 Independence Ave. SW
Washington, D.C. 20250-1104

**Re: Draft Environmental Impact Statement (DEIS) National Land Management Plan
Direction for Old-Growth Forest Conditions Across the National Forest System, 89
Fed. Reg. 52039 (June 21, 2024), EIS No. 20240110**

Dear Ms. McRae:

The National Alliance of Forest Owners (NAFO) appreciates the opportunity to submit the following comments on the *Draft Environmental Impact Statement (DEIS) Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, 89 Fed. Reg. 52039* (June 21, 2024), published by the Environmental Protection Agency at the request of the U.S. Forest Service. The U.S. Forest Service prepared the DEIS in response to Section 2(c)(ii) of Executive Order (EO) 14072, 87 Fed. Reg. 24851 (April 27, 2022) and in compliance with Section 23001(a)(4) of the Inflation Reduction Act (IRA)

NAFO is a national advocacy organization advancing federal policies that ensure private working forests provide clean air, clean water, wildlife habitat, and jobs through sustainable practices and strong markets. NAFO members own and manage more than 44 million acres of private working forests. Our State association members represent tens of millions of additional acres of private working forests across the country. Private working forests are a critical nature-based solution to many of our most pressing environmental challenges.

More than one-third of the United States is covered by forests, and 47% of U.S. forests (approximately 360 million acres) are private working forests owned by families, small and large businesses, Tribes, and investors often seeking to simultaneously maximize economic returns and drive specific environmental objectives. These working forests are not all managed the same way, but what they have in common is that they are the primary source of our domestic wood and fiber for the forest products supply chain. In the U.S., working forests relieve economic pressure on our nation's 251 million acres of non-working forests, or those managed for purposes other than wood and fiber production. Many non-working forests in the U.S. forests are managed as natural and wilderness areas.

Private forest owners are at the forefront of sustainable forestry in the U.S., deeply rooted in a culture of long-term stewardship, continuous learning, and American innovation. Sustainable private forest management achieves forest health, biodiversity, and resilience through timber production. Balancing current societal needs with future needs requires thoughtful, long-term planning decades into the future. At its core, sustainable forest management creates synergy between sustainability, productivity, and long-term stewardship to simultaneously provide environmental sustainability and economic vitality. In contrast, federal land management requires public involvement and, therefore, must balance competing and sometimes conflicting conservation, preservation, recreational, wood and fiber production, and risk management objectives. Federal and private land management are often complementary and provide a range

of public benefits. However, at times differences between federal and private land management can create management challenges across ownerships, such as in the case of wildland fire suppression and other natural disturbance response and mitigation.

Comments

As stewards of the land, private forest owners recognize the environmental, spiritual, cultural, and recreational value of old-growth and mature forest types and the benefits of their continued ecological integrity. However, old-growth and mature forests on federal land are distinct from forests grown and managed for harvest on private land. Approaches on federal land should not set a precedent for or be applied to approaches on privately owned working forests. NAFO members are pleased that the USFS acknowledges the fundamental differences between private and federal forest management and has clearly applied the proposed amendment exclusively to federal lands.

Section 2(c)(ii) of Executive Order 14072 directed the U.S. Forest Service to develop policies to institutionalize climate-smart management and conservation strategies that address threats to old-growth forests, including climate change. Old-growth forests can play a valuable role in mitigating the effects of carbon emissions but are not, alone, a silver bullet for mitigating climate change. Furthermore, old-growth forests are not necessarily synonymous with carbon stewardship. Instead, a well-balanced landscape of different forest types and life stage categories maximizes carbon-related benefits. Trees that grow rapidly – typically younger, less mature trees – will sequester more carbon annually; trees that grow slowly – typically older, mature trees— sequester less carbon each year.¹ Furthermore, mature trees will eventually reach the end-of-life stage and die, decay, and emit carbon while younger trees continue to grow and sequester carbon into maturity. On the other hand, larger (often older) trees store more carbon than smaller (often younger) trees. For this reason, a mosaic of diverse forest stands can optimize sequestration *and* storage over time.

Climate mitigation from our nation's working forests also includes carbon benefits attributed to long-lived wood products as they store large quantities of carbon oftentimes for decades. Approximately 90% of the timber harvest for domestic wood and fiber used to make forest products in the U.S. comes from private working forests. Because these forests are comprised of predominantly younger, rapidly growing trees, these forests annually account for 80% of net forest carbon sequestration in the US, removing more carbon from the atmosphere than is emitted by all passenger vehicles in the U.S. each year.² U.S. forests *and* the production of long-lived wood products offset 15% of U.S. industrial carbon emissions every year.³ These numbers show that *managed* forests are the workhorses producing climate benefits.⁴

¹ NCASI, "Forest Carbon from Young vs. Old Forests," January 2021, https://www.ncasi.org/wp-content/uploads/2021/01/NCASI22_Forest_Carbon_YoungVsOld_print.pdf, Accessed August 15, 2022.

² Oswalt et al, p. 223.

³ Janowiak, M.; Connelly, W.J.; Dante-Wood, K.; Domke, G.; M.; Giardina, C.; Kayler, Z.; Marcinkowski, K.; Ontl, T.; Rodriguez-Franco, C.; Swanston, C.; Woodall, C.W.; Buford, M. "Considering Forest and Grassland Carbon in Land Management," Gen. Tech. Rep. WO-95, Washington, D.C.: USFS, 2017, p.68.

⁴ NCASI, "Explanation of forest carbon data used for NAFO Environmental Benefits Report" <https://nafoalliance.org/wp-content/uploads/2022/07/NCASI-2022-C-Data-Memo-to-NAFO-with-Tables.pdf>, June 1,

2022, accessed August 18, 2022.

NAFO has developed an award-winning [Carbon Data Visualization](#) using government data to show the relative carbon benefits of forest ownerships, age class distributions, and forest products. We would be happy to brief your team on this tool so that it can inform this important work.

Maintaining a mosaic of successional stages across forest landscapes, both on private lands and National Forest System lands, is not only essential for carbon stewardship but also for biodiversity. Thousands of species rely on private working forests for a wide variety of forest conditions including early successional habitat, open canopy stands, and mature stands. Sustainable Forest Management creates and maintains a mosaic of interconnected, high-quality forest conditions for native plant and animal species, including those that are common, as well as those that are at-risk, threatened, or endangered. Under this approach, NAFO members have led nearly 700 wildlife conservation projects and have significantly contributed to the recovery of numerous species, including the Louisiana black bear, red tree vole, and gopher tortoise.

The DEIS outlines as a desired condition for Land Management Plans that old-growth forests contribute to the ecological integrity of a forest “in concert with other successional stages.” The DEIS provides reassurance “the proposed amendment is not intended to recruit all successional stages towards mature and old-growth.” NAFO members agree that “an approach which elevates older forests to the exclusion of other successional stages would present a challenge to maintaining or restoring the ecological integrity of terrestrial and aquatic ecosystems.” To ensure alignment between these stated values and the implementation of the proposed amendment, private working forests should serve as an example of a healthy forest with a mosaic of age classes.

The “Mature and Old-Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management” concluded “wildfire, exacerbated by climate change and fire exclusion, is the leading threat to mature and old-growth forests, followed by insects and disease in the West.” Forest carbon storage capabilities are compromised by these threats, creating a cyclical effect where climate change exacerbates wildfires, insects, and diseases, further impacting carbon dynamics. Addressing the wildfire crisis and the related stress from insects and disease is crucial for maintaining forest resiliency and optimizing carbon outcomes across landscapes.

On U.S. federal lands experiencing the outcomes of over 100 years of fire suppression, active management is necessary to foster resilience.⁵ The National Association of State Foresters (NASF) highlights “lack of management” as a main factor in creating age imbalances, leading to “a lack of early successional habitat for species” and “the risk of wholesale alterations in forest ecosystems,” especially if “trees in large swaths of forest reach the end of their natural lifespans (and begin dying) all at the same time.”⁶ The USFS’s analysis of threats on old-growth forests concluded old-growth volume decreased in reserved areas but increased by 7.8% in areas where management occurred--affirming the compatibility of old-growth conservation and active management, including timber harvesting. NAFO members are encouraged that the proposed action does not exclude management as a possibility and provides exceptions to guidelines and standards for wildfire mitigation projects. Timber production and proactive stewardship are

⁵ See cf. McShea, William J.; Healy, William M.; Devers, Patrick; Fearer, Todd; Koch, Frank; Stauffer, Dean; Waldon, Jeff. “Forestry Matters: Decline of Oaks Will Impact Wildlife in Hardwood Forests.” *The Journal of Wildlife Management*, 71 (5), 1717-1728, 2007.

⁶ NASF. “Recommendations to Improve the Health and Sustainability of Federal Forest Resources,” <https://www.stateforesters.org/wp-content/uploads/2021/09/2021-01-Policy-Statement-on-Federal-Lands.pdf>, September 8, 2021; accessed August 17, 2022.

inseparable elements in sustainable forest management, raising questions about the necessity of restrictions in the preferred action alternative.

In addition to threatening forests, severe wildfires and other disturbances on federal land also pose a significant threat to adjacent private forestland. The frequency and intensity of wildfires are increasing due to policies of exclusion of both forest management and low-risk fires coupled with a changing climate. Severe wildfires are destroying healthy forests and emitting greenhouse gases in a negative feedback loop that is exacerbating both crises.⁷ Any old-growth and mature forest strategy should work in concert with ongoing efforts to address wildfire risk, including the 10-year Strategy to Confront the Wildfire Crisis.⁸ Doing so is consistent with the direction and funding provided to the U.S. Forest Service in the Inflation Reduction Act and the Infrastructure Investment and Jobs Act as well as the recommendations of the Wildland Fire Mitigation and Management Commission.

Any approach to conserving old-growth and mature forests should prioritize the curtailment of wildfire, insect, and disease threats on federal lands. With thousands of miles of shared borders, public forest managers and private forest owners must work together to mitigate the risk of severe wildfires. A collaborative approach will help the U.S. Forest Service meet its goal of being a good neighbor, and it will protect the important climate and economic benefits private forestlands provide, as described previously in these comments.

Private forest owners agree with the U.S. Forest Service that mature and old growth forests must be protected from unnaturally severe wildfires. NAFO is proud to be partners with the U.S. Forest Service on two important wildfire initiatives. First, in March 2023, NAFO signed an MOU with the U.S. Forest Service, allowing qualified NAFO members to assist in fire suppression efforts for wildfires burning on National Forest System land adjacent to private land. Less than a year later, in February of 2024, NAFO signed a second MOU with the U.S. Forest Service to facilitate the installation of coordinated fuel breaks across ownerships--to mitigate the wildfire risk posed to important public and private assets, including old growth forests. Recently finalized plans to implement our first three projects under this MOU showcases the importance of this work, and NAFO would like to ensure that any future amendments to land management plans would bolster and further the work being carried out pursuant to these groundbreaking collaborative MOUs. The work we are doing jointly to protect both public and private land under these MOUs will most likely benefit the recruitment, retention, and resiliency of mature and old growth forests on nearby National Forest System lands.

Conclusion

Private working forest owners recognize the symbolic, spiritual, cultural, and recreational value inherent in old growth forests. They are also skilled at managing private working forests to achieve a variety of mutually beneficial environmental, economic, and social outcomes that help benefit forest ownerships across landscapes. Both private forest owners and federal land managers recognize that climate change and other threats like pests and diseases and invasive species present a growing risk to our forests, and that any federal policy should address those threats, directly. The need to address our country's wildfire crisis and the related stress of insects and disease is the most important priority for maintaining forest resiliency and

⁷ See for instance Halofsky, J.E., Peterson, D.L. & Harvey, B.J. "Changing wildfire, changing forests: the effects of climate change on fire regimes and vegetation in the Pacific Northwest, USA." *Fire Ecology* 16, 4, 2020. <https://doi.org/10.1186/s42408-019-0062-8> and Williams, A. P., Abatzoglou, J. T., Gershunov, A., Guzman-Morales, J., Bishop, D. A., Balch, J. K., & Lettenmaier, D. P. (2019). "Observed impacts of anthropogenic climate change on wildfire in California." *Earth's Future*, 7, 892–910. <https://doi.org/10.1029/2019EF001210>.

⁸ www.fs.usda.gov/sites/default/files/Wildfire-Crisis-Implementation-Plan.pdf

optimizing carbon outcomes across our landscapes, including the benefits provided by mature and old growth forests.

NAFO and its forestry partners are committed to engaging productively with the U.S. Forest Service on strategic approaches to optimize the environmental, social, and economic benefits of our nation's forests across all forest types, geographies, and age classes. NAFO appreciates the opportunity to comment on the DEIS. Please contact Bryan Petit at bpetit@nafoalliance.org with any follow up questions.

Respectfully,

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