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Dear Dr. Barbour:

On behalf of the approximately 12,000 members of the International Association of Fire Chiefs (IAFC), I submit comments in response to the July 15, 2022, "Request for Information on Federal Old-growth and Mature Forests." Specifically, these comments address the question about "what criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for planning and adaptive management?"

The IAFC is grateful for the opportunity to provide public comment to the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) request to define "old-growth and mature forests" in order to implement Executive Order (E.O. 14072): "Strengthening the Nation's Forests, Communities and Local Economies." We are concerned that the current frameworks and definitions are outdated and welcome your interest in updating these definitions.

Throughout the West, management of public lands impacts local communities and response agencies even though our role is not one of management of public lands. Old-growth and mature forests can provide benefits to local communities, but also threats when fires on federal lands burn onto state and local land. The IAFC recommends that the USFS and BLM consider factors in defining old-growth and mature forests that account for the geography, ecological concerns, community impacts, and local economies surrounding the forests.

For example, local communities' perspectives should be included in any risk-benefit analysis related to old-growth and mature forest management. This risk-benefit analysis should include factors such as updated planning timeframes for managing old-growth forests; the importance of protecting infrastructure located on and near federal land; and flexible strategies that will benefit the local communities located in the old-growth and mature forests. A risk-benefit analysis also should consider the effects of actions to manage the forests and not taking such action in order to incentivize federal, state, and local officials to cooperate in managing the forest. By considering the local perspective, USFS and BLM can both protect the ecosystem of old-growth and mature forests and provide economic and fire protection benefits to local communities.

Thank you for the opportunity to comment on the implementation of this important Executive Order to reduce the spread of wildland fires in our communities.

Sincerely,

Fire Chief Kenneth W. Stuebing, BHSc, CCP(f)

President and Board Chair