

Data Submitted (UTC 11): 8/26/2022 4:00:00 AM

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Title: DIRECTOR OF COMMUNICATIONS AND GOVERNMENT AFFAIRS

Comments: RE: Request for Information (RFI) on Federal Old-growth and Mature Forests, 87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185

Dear Mr. Barbour:

Thank you for the opportunity to respond to the Request for Information on Federal Old-growth and Mature Forests. Southport is a forest products company located in North Bend, OR with about 225 employees. Southport and our employees all care deeply for our public lands and National forests and want to see them healthy and resilient for future generations to enjoy.

We so greatly appreciate the Biden Administration giving the USFS the historic funding that it deserves to confront the wildfire emergency that is happening in our country. In the last three years alone, we have seen 22 million acres of forests burn down due to wildfire[i]. This is not a trend that we can afford to see continue. Which is why we support the Administration's decision to drastically increase the scale and pace of science-based management in our Nation's forests.

It is the mission of the US Forest Service "To sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of the present and future generations". To simply give our old growth forests across the country one universal definition would inadvertently create forests that are unhealthy and unproductive, meaning they likely would not be around for future generations to enjoy as we do today. We are living at a critical moment in time where we can both invest in our forests and use them as a tool to help mitigate climate change; or we can leave them to burn.

The United States is made up of many diverse forests, a single definition would either leave the definition so vague that it would be a useless tool in guiding forest management, or so specific that it would leave out forests that many would consider to be mature. The time and resources used to create one universal definition for mature and old growth forests in the United States would be better served by focusing on forest management tools to help protect our forests against fire, insects, and disease.

The earth is continuing to rise in temperature and wildfires are getting worse. While West Coast old growth forests have been fire resistant in the past, that doesn't mean that they will continue to remain so. Each year fires are burning hotter and more intense than they have before and every year they are burning more mature old growth, thus releasing the carbon they store back into the atmosphere.

Simply inventorying and defining old and mature forests is akin to walking away from them. Treating old and mature forests with active forest management tools so they can be more fire resistant, continue to store carbon, and still be left standing for future generations may be our best hope to truly sustain the health, diversity, and productivity of the Nation's forests.

Our recommendations to the USFS are as follows:

1. Keep it Local

1. Leave it to local counties to set their own definitions of what old and mature forests look like in their areas, rather than trying to create one definition for all US forests.

2. Avoid definitions that will further tie the hands of the USFS

1. We have seen time and time again how new forest management plans with conservation in mind have tied the hands of our forest service while doing nothing to actually benefit our nation's forests. The Northwest Forest Plan and Eastside Screens are just two of many examples of policy that have caused science-based management to become timelier and more expensive while simultaneously putting communities at risk of fire, decreased the health of our forests, and exacerbated conflict over our public lands. Let's learn from the past and not tie the hands of the forest service any more by creating arbitrary definitions of what old and mature trees are.

3. Use forests and wood products as a way to combat climate change

1. Rather than focusing USFS resources on trying to define and inventory mature and old growth forests, instead focus on how forests can help fight climate change. While it is true that old growth forests hold a lot of carbon, they're also not sequestering and new carbon. Young trees sequester carbon. Once a tree is harvested and turned into wood products, those products will continue to store carbon for the remainder of their life. This is a much more effective way of fighting climate change as opposed to storing carbon in an old or mature forests. Even more concerning is that forests deemed as old or mature will not be managed and therefore much more susceptible to wildfire. If these forests burn, all of the stored carbon in them gets released back into the atmosphere. This is why we are recommending putting resources into science-based practices that we know work, rather than wasting time with arbitrary definitions.

We appreciate you taking the time to review our comments and greatly appreciate all that Forest Service and BLM do to help fight our wildfire and forest health crisis.

Thank you,

Payton Smith

Director of Communications & Government Affairs

FOOTNOTES:

[i] <https://www.nifc.gov/fire-information/statistics/wildfires>