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Comments: The American Loggers Council (ALC), represents forest harvesting and hauling professionals in 38 states, representing over 10,000 timber companies and 50,000 employees. ALC was formed in 1994 to serve as a unified, national voice for professional loggers across the United States. Made up of a coalition of state and regional logging associations and councils. ALC is truly loggers working for loggers and is committed to enhancing the logging profession, establishing a more level playing field for professional loggers, and providing accurate information about the logging profession to forest products companies, landowners and the public.

Associated Oregon Loggers (AOL) is a local trade association in the state of Oregon which represents nearly 1000 small forest contracting businesses and 23,000 Oregonians. AOL's members have been involved in the management of federal lands for decades and are essential to conduct any activity in the woods. AOL's member companies complete road work for access, timber falling for management and restoration, reforestation for sustainability, trucking for product transportation, and many other services. AOL's members provide a diverse array of services that are necessary for the United States Forest Service (USFS) and Bureau of Land Management (BLM) to conduct all of its forest management activities in order to achieve the goals and objectives of Management Plans across the state of Oregon and elsewhere. Some of AOL's members travel as far as Colorado to complete harvest operations and further for reforestation contracts.

Both ALC and AOL hereby submits the following comments in response to the Request for Information regarding defining Old-Growth and Mature Forests and conducting an inventory.

First, the very implication that Old-Growth and Mature Forests are attempting to be defined, is of concern as it suggests that these newly defined categories would result in changed management practices. The management that currently occurs on federal lands is vetted by forestry and other natural resource professionals through the development of overarching management plans and then further finessed at the project level through the National Environmental Policy Act. New definitions that would somehow capture the nuances of nature throughout the country into universal definitions is likely to further apply restrictions on scientifically based silvicultural forest management practices. We caution that such a definition cannot be defined by the USDA or USDI in a scientifically based silvicultural manner. Because a scientific definition is unrealistic, the defined outcome would become a political determination.

Such a political definition of Old-Growth and Mature Forests would be destructive to future federal forest management. Such a political definition of Old-Growth and Mature Forests also would be irretrievably divisive to explore future collaboration among forest professionals, scientists, agency managers and those essential private-business forest infrastructure partners with whom the federal agencies depend to conduct forest management activities.

The Climate Forests Coalition, a group of dozens of environmental organizations including Environment America, the National Resource Defense Council, Center for Biological Diversity and the Sierra Club prepared an unbalanced and politically motivated report [ASA1] claiming that logging is the greatest threat to mature and old-growth forests prior to President Biden's Executive Order 14072: Strengthening the Nation's Forests, Communities, and Local Economies

The destructive unspoken objective of this exercise in defining Old-Growth and Mature Forests is evident. Reduced active forest management surrounding Old-Growth and Mature Forests through a nationwide exercise would be fraught with harmful peril to overall federal forest health and the forest management partners with whom the agencies depend to sustain federal forestlands and affiliated rural communities. Significant restrictions

and limitations already exist regarding Old-Growth Forests on federal land. The addition of the new category of [ldquo]Mature Forests[rdquo] opens a toxic pandora[rsquo]s box that would allow for a destructive new weapon in the arsenal of regular legal challenges that obstruct federal forest management efforts.

In the west, this strategy from serial litigants has resulted in forests so dense with fuel and unmaintained roadways that firefighters have little option other than miles away contingency lines, ariel resources, and large swaths of backburning to try and protect the forested resource. When these tactics are applied on the ground, it is inevitable that Mature and Old-Growth Forests are harmed. So, what is the benefit of restricting activities in and around these types of forests if in the end, that very management decision leads to their destruction anyways.

[ldquo]Commercial forests are often grown to maturity and then harvested before they reach old-growth status[rdquo] Len Montgomery, Environment America Public Lands Director

The irony of this argument is that it advocates that [ldquo]mature[rdquo] forests not be harvested in order to allow it to reach so-called old or [ldquo]old-growth[rdquo] status, at which time it cannot be harvested either. This would suggest that forests should be harvested before they reach maturity, which would further perpetuate the position that mature forests are necessary to develop old-growth forests . Under that premise, immature forests must be protected to allow it to become mature forests, and later protected as old-growth forests. Hence, no forest harvest on public lands is the ultimate objective of certain activist organizations. The consequences of which are witnessed annually with the burning of millions of acres of public land forests.

The USDA and DOI need to approach this response to the Executive Order from a scientific and current statutory perspective, and not an agenda-driven means to an end. From a realistic approach, all considerations must be based on science-proven silvicultural practices, management experience and existing forest management objectives for local federal lands, as defined within statutes (National Forest Management Act, Federal Land Policy and Management Act, Multiple Use Sustained Yield Act, and Resources Planning Act, among others). The proposed Federal Old-Growth and Mature Forests Definition would harmfully-violate the existing statutory, collaborative, and science-proven forest management principles of these agencies.

A singular objective, of Old-Growth and Mature Forests would abrogate the important principles, statutes, and partner collaboration essential for future agency management of federal forestlands.

I paraphrase that [lsquo]Silviculture[rsquo], as defined by the Society of American Foresters, is: A branch of forestry dealing with the development and care of forests to accomplish the owners many objectives. [ldquo]Many objectives[rdquo] are not achievable by a one-size-fits-all nationwide definition, or defacto policy for mature and old forests.

Generally, silviculture is the [ldquo]science[rdquo] and art of growing and cultivating forest crops, based on a knowledge of silvics (the study of the life-history and general characteristics of forest trees and stands, with particular reference to local/regional factors). The focus of silviculture is the control, establishment, and management of forest stands. The primary benefits of silvicultural practices are; the production of abundant raw materials for the forest products industry; an increase of forest cover which is necessary for conservation of wildlife; maintenance of critical ecosystem services; among other benefits.

The practice of silvicultural based forest management identifies the process as a stand that is tended, harvested, and re-established. Silviculture is a cycle that requires all aspects of the process to be completed. The harvest age class cycle is based on maturity, which varies by region, ecosystem, species and even microclimate.

Silvicultural [ldquo]science[rdquo] has studied and made determinations about stand density of healthy forests per acre based on a multitude of factors that vary from location to location. Much of the western forests are

severely overgrown with 4-5 times the number of stems (trees) per acre. A recent study, that the US Forest Service participated in, acknowledged that a warming climate has extended the wildfire season for obvious reasons. However, the study found that climate change only accounts for 14% of the influence on more destructive wildfires, while noting that live fuel was the largest factor, accounting for 53%. Global wildfire carbon dioxide emissions are at record highs. The Copernicus Atmosphere Monitoring Service of the EU found [ASA1] that burning forests released 1.3 gigatons of carbon dioxide in the month of August 2021 alone, the highest since the organization began measurements in 2003. The U.S. was a leading contributor to these emissions. Scientists are concerned that areas with dense vegetation -including many of our federal lands - are becoming a source rather than a sink of greenhouse gases.

Therefore, any consideration in defining Mature and Old-Growth Forests, must be based on the science of silviculture and existing statute and policy; rather than a unilateral environmental agenda purporting no forest management or harvest. The latter is not scientifically based and an obvious attempt at creating another false premise to obstruct science-based silviculture and statutory forest management practices.

The conclusion of the USDA and DOI, if based on facts and science, must be that any attempt to universally define Mature and Old-Growth Forests will end in such a broad definition that it will be useless in developing an inventory. Furthermore, including and defining Mature Forests is not possible and would contribute nothing towards the goals of improving forest health, reducing wildfires and contributing to natural climate solutions in the United States.

Most lands managed by the federal government are already off-limits to logging or have restrictions that make active forest management infeasible and a well-meaning but misguided effort to define Old-Growth and Mature Forests will only lead to more arbitrary policies that limit the ability of federal agencies to treat overstocked, fire-prone forests, and less Old-Growth on the landscape over time.

The focus of federal land management agencies should be to reduce disturbance events that jeopardize the longevity of management activities and the stability of the forest products sector.

President Theodore Roosevelt, America's [ldquo]Conservation President[rdquo], in a speech to the Society of American Foresters in 1903 stated:

[ldquo]I believe there are few bodies of men who have it in their power to do a greater service to the country than those engaged in the scientific study and practical application of improved methods of forestry for the preservation of our woods in the United States. I am glad to see here this evening not only the officials, including the head, of the Department of Agriculture, but those, like Governor Richards, most concerned in carrying out the policy of the Department of the Interior.

First and foremost, you can never afford to forget for one moment what is the object of the forest policy. Primarily that object is not to preserve forests because they are beautiful[mdash]though that is good in itself[mdash]not to preserve them because they are refuges for the wild creatures of the wilderness[mdash]though that too is good in itself[mdash]but the primary object of the forest policy as of the land policy of the United States, is the making of prosperous homes, is part of the traditional policy of home-making of our country. Every other consideration comes as secondary. The whole effort of the government in dealing with the forests must be directed to this end, keeping in view the fact that it is not only necessary to start the homes as prosperous, but to keep them so. That is the way the forests have need to be kept. In other words, you, yourselves, must keep this practical object before your mind. You must remember that the forest which contributes nothing to the wealth, progress, or safety of the country is of no interest to the government, and it should be of little to the forester. Your attention should be directed not to the preservation of the forests as an end in itself, but as the means for preserving and increasing the prosperity of the Nation. Forestry is the preservation of forests by wise use. We shall succeed, not by preventing the use, but by making the forests of use to the settler, the rancher, the miner, the man who lives in

the neighborhood, and indirectly the man who may live hundreds of miles off, down the course of some great river which has its rise among the forests.[rdquo]

This Request for Information is an exercise in harmful semantics that would accomplish nothing positive toward future accomplishments of those federal forest management goals and objectives of the United States stated in statute. Implementation of language defining Old-Growth and Mature Forests would, on the contrary, [ldquo]create forests which contribute nothing to the wealth, progress or safety of the country, and should be of no interest to the government.[rdquo]

We recognize that the Inflation Reduction Act has now appropriated [ldquo]\$50,000,000 for the protection of old-growth forests on National Forest System land and to complete an inventory of old-growth forests and mature forests within the National Forest System.[rdquo] Collectively, we ask that a new tactic be used to accomplish this requirement which includes critical partners in the management and protection of federal lands [ndash] the small forest contractors that manage these lands and actively engage in mitigation, protection, and recovery efforts of this critical national resource.

It is our forest contractor and timber hauling members that provide the necessary workforce and capacity to achieve federal forest objectives on the ground. The worst thing we could do during a climate crisis is to walk away from our public lands and decide not to use the tools available to help adapt them to changing conditions while simultaneously reducing the risk of catastrophic wildfire and other disturbances. This is what would happen if the USDA and DOI continue down the path set forth in Executive Order 14072 and this Request for Information which regrettably do not focus on communities and economies but prioritizes climate change and forest mismanagement that will lead to forest health and rural economic decline.