

Data Submitted (UTC 11): 8/30/2022 4:00:00 AM

First name: Amy

Last name: Shields

Organization:

Title:

Comments: RE: Request for Information (RFI) on Federal Old Growth and Mature Forests (Executive Order 14072) #NP-3239

Dear Mr. Barbour:

The membership of the Allegheny Hardwood Utilization Group (AHUG) appreciates the opportunity to provide comments regarding the Request for Information (RFI) related to Old Growth and Mature Forests (87 Federal Register 42493 - 42494) and (87 Federal Register 50119 - 50120), extending the comment period to August 30, 2022. Founded in 1984, AHUG is a non-profit forest industry association with more than 100 member companies, working to promote the long-term economic growth and development of the forest products industry within Northwest and North Central, PA - a region which includes the Allegheny National Forest. In accomplishing this mission, AHUG provides working forest public education, outreach and advocacy, forest industry workforce development and training, promotion of hardwood products and support for research and development designed to advance the hardwood industry and sustainable, science-based forest management.

AHUG would like to provide the following input to the Old Growth and Mature Forests RFI:

[bull] We believe it is ill-advised to attempt to create a universal definition or a "universal definition framework" for Old Growth and Mature Forests. Doing so would discount the regional, biological and climate diversity of the nation's public timberlands, severely limiting the ability of federal forestland managers to develop and implement adaptive, active, science-based management plans that promote forest health, resiliency to fire, insects and disease. and that enhance the capacity of federal forestlands to sequester and store carbon. One would be hard-pressed to identify "overarching old-growth and mature forest characteristics" that are applicable across a 193-million-acre National Forest System that spans humid, subtropical pine flatwoods in the Florida Panhandle to Boreal forests in the Lake States, to arid pine forests in the Mountain West, to temperate rain forests in the Pacific Northwest and Alaska.

[bull] In no case should federal agencies consider adoption of any definition based on arbitrary attributes such as tree size, age, or diameter limits. If pursued, any definitional framework should focus on stand characteristics rather than individual trees and should be created with explicit policy goals in mind, such as the EO's direction to "retain and enhance carbon storage." If the federal policy objective is to optimize forest carbon sequestration and storage potential, a mosaic of constantly changing forests of various age and size classes across the landscape should be the intended future condition.

[bull] This effort to "define, inventory and conserve" Old Growth and Mature Forests could pave the way for an overly broad definition of "Mature Forests", too closely aligned with "Old Growth", that would be unworkable and create uncertainty for federal land managers. Further, this could create a tool that some stakeholders might use to advance policies that ultimately setback sustainable forest management by imposing a blanket ban on the harvest of all Old Growth and Mature Timber. If used to remove acreage from harvesting, the definition would undermine carbon capture by applying a "one size fits all" criteria to resources as biologically and geographically diverse as our nation's forests.

[bull] Further, while this effort relates to federal forestlands, any federal definition of "Old Growth and Mature Forests" may be attempted to be used at a state level to restrict harvest, even on private lands. State and Private working forests are a critical nature-based solution to many of our most pressing environmental challenges and should not be placed at risk of setback in sustainable forest management.

[bull] The effort to "define and inventory" Old Growth and Mature Forests undermines the Biden Administration's own 10-year wildfire strategy to significantly increase forest management treatments and diverts limited resources away from our national wildfire crisis, as well as the "green fire" threat posed to eastern national forests by non-native invasive plants and pests.

[bull] For a definition of "old growth forests" to be "durable," it must apply to static or unchanging conditions, which clearly do not exist within the context of forest management. Because of the impacts of climate change, among other factors, the agencies should be promoting adaptive forest management practices now more than ever.

[bull] The carbon benefits of the forests do not reside solely in the sequestration and carbon storage of standing trees. The sustainable forestry practices used to manage our public and private forests, the products derived from the harvest of hardwood trees, and the availability of reliable markets for those products all provide an essential part of the solution sought by the President and his Administration to the problems associated with atmospheric carbon.

The Allegheny Hardwood Utilization Group appreciates the opportunity to provide comment on the RFI and is committed to engaging with the Agencies on strategic approaches to optimize the environmental, social, and economic benefits of our nation's forests.

Respectfully,

Amy Shields

Executive Director,

Allegheny Hardwood Utilization Group (AHUG)