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Organization: West Virginia Forestry Association (WVFA)

Title:

Comments: Dear Director:

Contained here within are comments from West Virginia Forestry Association (WVFA) concerning the Notice of Proposed Planning Changes as published in the Federal Register on December 20, 2023 (see 88-FR 88042). The West Virginia Forestry Association is a trade association that represents the forest products industry for the state of West Virginia. Our members range from individual landowners to very large forest product manufacturers.

The national forest system encompasses roughly 193 million acres in this country. Of this acreage, less than 25% is designated for allowable timber harvesting. We realize that managing such a diverse public landscape comes with a multitude of challenges that include budget constraints, catastrophic failures from wildfire, insect and disease outbreaks, invasives, and vocal demands from various social groups. Because of this timber sales have declined over the years, impacting the economies of local communities through the loss of jobs and a reduced tax base. This all leads to a negative impact on schools that depend on these tax revenues. We feel that this decline in active management has

reduced forest health and sustainability. WVFA feels that having only 25% of the land eligible for active forest management is too low and that management is not mutually exclusive of other uses. We feel the proposed plan amendments are intended to reduce this concerning number even further.

As you may be aware, West Virginia is the third most forested state in the country. The industry accounts for roughly 30,000 jobs and has an economic input of \$3.2 billion in the state's economy. The forest product industry has a footprint in all fifty-five (55) counties in the state. Bottom line is that the forest products industry is very important to the state. In West Virginia the national forest accounts for roughly 8% of our forested lands (approximately 919,000 acres) making it an important part of our landscape.

The hardwood forest products industry is responsible for the quality of lives we have come to enjoy in this country, and these products touch each member of our society. Everyone benefits from wood products such as construction lumber, furniture, flooring, cabinets, packaging, and paper. Furthermore, our infrastructure and transportation systems are highly dependent upon wood products such as railroad ties, industrial mats, and shipping pallets. All these products require a resource that is sustainably managed from both domestic private and public land bases. WVFA supports the long-term storage of carbon in these forest products, and we feel that forest product additionality should be considered in your resource planning.

Each national forest is unique, and each ranger district has their unique ecoregions. In the past much of the resource planning has been the responsibility of the Forest Supervisor and the District Rangers. WVFA feels that the proposed blanket planning amendment will reduce the local input and knowledge in the planning process. Furthermore, the above referenced document alludes that this planning revision is needed to increase the

protection of mature and old-growth stands to sequester and capture carbon to help alleviate climate change. We would like to express that our assessment is that healthy growing forest stands that are sustainably managed to include forest products help capture and store carbon for longer periods of time. It is WVFA's stance that healthy stands are less susceptible to invasives, insects and disease, and catastrophic wildfire, all of which can lead to reduced carbon sequestration and capture and may, in some cases, increase carbon emissions. Our view is - more trees and healthy growing forests yield less atmospheric carbon.

Because forests are very complex systems with multiple layers of geographic and biological diversity, we feel the planning process is better served at the forest level rather than a one size fits all as being proposed. We also feel that a planning process that is designed to "protect" and expand old-growth and mature forest for carbon sinks will be counterproductive as these stands reach a steady state phase. We feel a diverse distribution of age classes that are sustainably managed and include the production of forest products improves carbon captures, provides a multitude of ecosystem services, fosters economic values, and improves wildlife benefits all while yielding stands that are less susceptible to catastrophic failures.

We thank you for the opportunity to comment on the proposed planning amendment and ask you to please consider in your planning process that actively managed forests yield resilient forests.

ATTACHMENT: USFS Comments.docx is letter content.