

Data Submitted (UTC 11): 2/2/2024 5:00:00 AM

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Organization: NH Timberland Owners Association

Title:

Comments: Attached are the NH Timberland Owners Association's comments. We are also attaching the Society of American Forester's fact sheet on mature forest and old-growth.

Please confirm you received these comments.

Thank you,

Jasen Stock

To whom it may concern,

Founded in 1911, the New Hampshire Timberland Owners Association (NHTOA) represents forest landowners and the forest products industry in New Hampshire. This sector of New Hampshire's economy is the third-largest manufacturing sector in the Granite State employing over 9,500 people directly with annual payroll of over \$320 million. High quality timber offered from the White Mountain National Forest (WMNF) is an important part of the raw material source for this industry and the management projects producing this timber also provide healthier forests, diverse wildlife habitat, and many other benefits for New Hampshire's citizens.

The NHTOA is writing in opposition to the proposed Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356. Our opposition to this proposal is two-fold, respect for the local planning processes, and poor science.

#### Planning process

The NHTOA was a active participant in the 2005 WMNF resource planning process. This process spanned multiple years and received input from thousands of individuals, companies, and other stakeholders. All the multiple use organizations and stakeholders provided input and helped shape a plan that balances these uses. The plan includes consideration for commercial forestry, recreation (developed and undeveloped), wildlife habitat, cultural resources, water and soil quality, and forest health/structure - including old-growth and wilderness. Not every stakeholder or organization got everything they wanted, but in the end they were satisfied, and for this reason we believe the plan was not appealed.

To disregard the time, energy, and commitment of these stakeholders, individuals, companies, and organizations by imposing a new management direction originating from an executive order #14072 is wrong. Such actions are a disincentive for citizens to participate in forest resource planning process and participating in project-level planning efforts. If the Executive Branch wishes to see a greater emphasis put on old-growth management they should update the National Forest Management Act where these considerations could then be incorporated into individual forest plans within the context of multiple use management. We saw a similar attempt to direct Forest Service management during the Clinton Administration with executive orders designating "roadless areas". The loss of trust and disillusion from this effort is still being felt by many in the forestry community and amongst other stakeholder organizations. Please respect the plans, your staff, and the communities that participate in the planning process.

#### Poor Silviculture

The Society of American Foresters, long recognized as the forestry profession's organization promoting science and silviculture in the U.S., in its "Defining Mature and Old Growth" guidance document clearly states that old-growth is not solely defined by tree size.

This appears to be at odds with how the U.S. Forest Service is defining "old-growth". The threshold parameters the Forest Service will be using are only based on tree size, as evidenced by the diameter sizes published on the Region 9 table, on pages 45 and 46 of the April 2023 report entitled, Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management Fulfillment of Executive Order 14072. In this table, more than 10 hardwood trees per acre with a diameter greater than 16" would qualify that acre as a candidate for old-growth classification. When coupling this definition with the proposed management standards for these stands, specifically management standard #3 - "Vegetation management within old-growth forest conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons. Ecologically appropriate harvest is permitted in accordance with standards 1 and 2." it appears a lot of land will no longer be eligible for commercial forestry projects.

Moreover, the WMNF's management objectives for the past two decades has been to manage for long-rotation, sawlog and veneer quality timber. With the newly imposed definition and management standard we see much of that careful management and commitment to growing quality timber being lost. Ironically, this timber goes mostly into the production of solid wood products (housing, furniture, etc.) which stores carbon. Removing these acres from commercial forestry removes the opportunity to store carbon in products people use and need, while promoting new forest growth and regeneration that will sequester additional carbon. Instead, by not allowing forest management in these mature stands, the timber will eventually die and decay releasing carbon and methane into the atmosphere.

The NHTOA urges the Department to reconsider its decision to pursue this ill-advised proposal and respect the management plans the communities and U.S. Forest Service have already invested in.

Thank you,

Jasen A. Stock

Executive Director

CC: Derek Ibarguen, Forest Supervisor, WMNF

ATTACHMENT: NHTOA comments 2-2-2024.docx is letter content.

ATTACHMENT: SAF definition 2024.pdf is a paper titled Defining Mature and Old Growth: Why it's so important to rely on place based science and local expertise when attempting to define stages of forest structure.