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Title:

Comments: Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Secretary Vilsack,

Mast Reforestation submits these comments in response to the notice of intent issued by the U.S. Forest Service ("USFS") on December 20, 2023, entitled "Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System," 88 Fed. Reg. 88042-88048 (the "Notice"). While Mast Reforestation supports the adoption of climate smart regulatory policies on National Forest System ("NFS") land, the language of the notice does not adequately reflect fundamental ecological differences driving management needs and risks across the diverse and dynamic National Forest System.

Mast Reforestation is a vertically integrated reforestation company focused on restoring forests after catastrophic wildfires and other disturbances. Our reforestation supply chain provides private landowners and public land managers an end to end solution for reforestation. Our subsidiaries, Cal Forest Nurseries and Silvaseed are historic and essential elements of the US reforestation supply chain serving all public and private forest landowner interests. Through them, we grow the majority of California's seedlings, a large component seedlings for other western states, and maintain the largest tree seed bank in the western 11 states. Additionally, we are employing innovative carbon finance to offer private landowners a no-cost reforestation solution and incentivizing the evolution of forest economies.

Comments

Mast has segmented comments into a vegetation management category and a seed category, then further segmented comments by the section number from the Notice.

Vegetation Management Standards for Management Actions within Old-Growth Forest Conditions

1) The agency should consider adding that vegetation management activities must be in service of long-term forest resilience. Additionally, this section should clarify what activities would be allowed after a wildfire or other disturbance in an old-growth or mature stand.

2a) The agency should consider modifying this section to reflect the different stressors facing the diversity of forest types reflected across the Regions. Restricting active management (e.g. thinning, fuels reduction, prescribed burns, as appropriate) in fire prone regions poses risk to the goal of the Notice and to adjacent public and private land.

2b) As mentioned in the Wildfire Crisis Strategy, the agency has determined that the most pressing threats to the National Forests are wildfire, insects, and disease. However, it is not clear how the proposed amendments to forest plans will help the agency achieve the Wildfire Crisis Strategy and address these threats. For example, limiting the fuels reduction exemption to vegetation management to the Wildland Urban Interface ("WUI") leaves millions of acres at risk - including those of adjacent non-federal ownerships with notable ecological and economic value. Most fires begin in the backcountry, and serve as a direct threat to old-growth and mature forests as well as infrastructure as a fire spreads to the WUI. Fuels reduction should not be limited to the WUI. The agency should clarify the scope of exception for vegetation management for fuels reduction.

3) The agency should clarify what 'primary' means within the context of economic benefit and that it is acceptable for contracts to earn a profit for implementing vegetation management activities, so long as these activities are in service of long-term ecological resilience.

Plan Monitoring

3) Mast encourages the agency to consider making plan-level data open access and available to the public. This data would serve as a critical ecological reference point to help the informed scientific community, innovators, foresters, and other land managers conduct relevant analysis with the purpose of improving the understanding of how these management decisions impact the ecosystem.

Seed

US federally managed or maintained old-growth and mature riparian areas serve as a genetic repository and a legacy of ecological integrity from a broader landscape perspective. In addition to conserving these areas and performing some active management to help maintain integrity, these areas should be made available for seed collection to service adjacent public and private land restoration. As disturbances continue to impact the landscape, seed becomes increasingly critical to recovery efforts, and wildfire is agnostic to ownership. Additionally, seed collection from old-growth and mature forest units can help connect the mosaic of old growth areas and provides an opportunity to create a diversity of species that were previously removed for other land uses. Standards for Management Actions within Old-Growth Forest Conditions 2a) In service of points vii, viii, ix,x, and xi, the agency should consider allowing seed collection to help accelerate restoration activities on the landscape.

Conclusion

In summary, Mast encourages the agency to adapt this language to better account for Regional and forest differences, especially as it pertains to vegetation management. We also view these intact old growth and mature resources as a potential boon to seed based restoration efforts if access is managed carefully. We applaud the Agency's efforts in pursuing climate smart regulatory policy and are eager to contribute our expertise in implementation. Please contact Mast if you would like further information. Thank you for your attention to this matter and commend your commitment to the conservation and health of public lands.

Attachment: FINAL: Old Growth and Mature Forest Rulemaking - copy of formal comments.