Data Submitted (UTC 11): 2/2/2024 5:00:00 AM
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Comments: Attachment: NASF Comments_USDA MOG_2023-27875 NOI_Final_02022024.pdf is their comments. Please see the attached comments from the National Association of State Foresters.

February 2, 2024

Director Ecosystem Management Coordination

USDA Forest Service

201 14th Street SW, Mailstop 1108

Washington, DC 20250-1124

Document Citation: 88 FR 88042; Document Number: 2023-27875 Notice of Intent to prepare an environmental impact statement

Dear Sir or Madam:

The National Association of State Foresters (NASF) is pleased to respond to the United States Department of Agriculture (USDA) Forest Service Notice of Intent (NOI) to prepare an environmental impact statement (EIS) to amend all land management plans for units of the National Forest System to include consistent direction to conserve steward and recruit future old-growth forest conditions.

NASF represents the directors of forestry agencies in all 50 states, U.S. territories, nations in free association with the U.S., and the District of Columbia. These agencies protect and help manage over 500 million acres of forest across the U.S. hand-in-hand with local governments, individuals, and families. They also regularly contribute to the management and protection of federal forest lands in an all-hands all-lands effort to confront the nation's wildfire crisis.

In August of 2022, NASF responded to the Request for Information on federal old-growth and mature forests. In that letter, we pointed out the tremendous variability among forests nationwide and the difficulty in defining a framework that can capture that variability. It will be incredibly difficult to account for that variability and provide [ldquo]consistent direction[rdquo] in this national-level effort [ldquo]to conserve and steward existing and recruit future old-growth forest conditions.[rdquo]

NASF respects the intent of Executive Order 14072 (The EO) as it recognizes that old-growth forests contribute to nature-based climate solutions, increase biodiversity, mitigate wildfire risks, enhance climate resilience, enable subsistence and cultural uses, provide outdoor recreation opportunities, and promote sustainable local economic development. Our members agree that those values are important and work closely at a national level 2 and locally towards ensuring forests of all ages support those goals.

In the November 2023 Mature and Old-Growth Forest Threat Analysis Update Webinar, Forest Service staff detailed the initial findings that the greatest threats to old-growth are wildfires, insects, and disease. NASF agrees and would add that these threats are prevalent for forests of all ages and across all ownerships. The management of federal forest lands greatly influences not only National Forest System (NFS) lands but also the 66% of America[rsquo]s forestland that is not federally owned. These lands provide benefits to society as a

whole, and their health and resilience can be put at risk when nearby NFS lands are inadequately managed. Well-planned, science-based, and deliberate forest management activities, including commercial timber harvest, are necessary to limit these threats. NASF is concerned that this national-level effort will limit the forest service's ability to increase the pace and scale of active forest management to meet the wildfire crisis strategy and improve forest conditions.

We offer the following more specific concerns and comments for your consideration.

* The ongoing wildfire crisis is an urgent matter. Utilizing staff time to develop these 128 Forest Plan amendments must not slow down ongoing forest plan revision, project planning, or project implementation.
* The language in the EO and NOI is predicated on the assumption that old-growth is currently underrepresented across all landscapes, and recruiting more old-growth will result in a landscape less prone to insects, disease, and catastrophic wildfire. While this may be true on some National Forests, individual forest plans, rather than a national initiative, are the appropriate place to quantify historic old-growth conditions and determine suitable amounts and locations of old-growth and recruitment old-growth.

* The language in the EO lays out a sequence of events, to first define mature and old-growth forests, take inventory, conduct a threat assessment, then develop policy around mature and old-growth management. NASF is concerned the Forest Service has begun making policy without finalizing the threat assessment for mature and old-growth forests.
* Current forest plans are the result of difficult and deliberate collaboration among diverse stakeholders and represent the hard work of the Forest Service balancing the needs of diverse stakeholders and the land itself. We are concerned that this national effort could reduce trust amongst these local stakeholders and undermine those collaborative efforts.
* We are concerned the national-level plan revisions could hinder, rather than encourage, Forest Service staff to make the appropriate decisions to manage the forest for the values in the EO and other values. Restrictive land management designations currently in place, such as the roadless rule, offer exceptions to allow for active management, but history shows that the use of these exceptions tends to be controversial, adds to the already burdensome National Environmental Policy Act implementation process, creates an extra layer of complexity, and makes projects vulnerable to objection and litigation. For these reasons, Forest Service line officers are reluctant to use these exceptions.

* Any plan amendments should enhance, not hinder, the Forest Services' ability to quickly plan and implement management actions that foster the long-term resilience of old-growth stands and broader landscapes.
* The retention and recruitment of old-growth may not be compatible with all forest types in all locations. It must be recognized that certain forest types have a natural stand dynamic of low frequency/high severity disturbance and, by their very nature, when they reach maturity, they are inherently not resilient. Disturbance can include insects, disease, and stand-replacing wildfire that can result in negative impacts beyond the individual timber stand. Other values must be considered when making management decisions to recruit, enhance, and maintain old-growth.

* Guidance must clearly state recruitment and retention of old-growth attributes shall not limit fuel reduction activities designed to protect values at risk.
* Guidance must clearly state retention and recruitment of old-growth must not create favorable stand conditions for insects and disease or wildfire that could impact NFS lands or adjacent state or private lands.
* NASF is strongly opposed to establishing limitations for diameter or age that would result in restrictions for harvesting timber. Arbitrary limits such as these can never consider the full spectrum of variables at the project or stand level and always have unintended negative consequences.
* Considering forest plans represent a vision for a given national forest for approximately 10-15 years, yet many forest plans are over 30 years old, NASF is concerned the amendments will lock forests into an untested direction without a plan to re-evaluate on a reasonable timeline or adapt to the best available science.

* NASF recognizes the importance of accurate forest inventories to help land managers make decisions. We are supportive of increasing the precision and accuracy of forest inventories in general and specifically for old-growth and mature forests.

Lastly, we are compelled to comment that releasing a NOI for such a large topic on December 20, 2023 with comments due by February 2, 2024 leaves organizations like ours little time to prepare meaningful comments representative of our entire 50-state membership. Individual States will also be submitting comments; those letters will show some commonality among States and also highlight the differences dictated by local conditions. NASF would welcome further discussion on the comments and concerns raised in this letter.