



# NATIONAL ASSOCIATION OF STATE FORESTERS

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Dear Ms. Walker:

The National Association of State Foresters (NASF) is pleased to respond to the United States Department of Agriculture (USDA) Forest Service Draft Environmental Impact Statement (DEIS) to Amend Land Management Plans to Address Old-Growth Forests Across the National Forest System (NFS).

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, and in February of 2024, we commented again on the Notice of Intent to develop this DEIS. Many NASF members have also been heavily involved, with some state forestry agencies requesting cooperating agency status.

We respect the intent of Executive Order 14072 and appreciate the time and effort spent on the Mature and Old-growth Inventory, Threat Analysis, and this DEIS as 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 and locally towards ensuring forests of all ages support those goals.

NASF and its members have long-running partnerships with the Forest Service. Across the nation, there are numerous examples of joint planning documents and Shared Stewardship Agreements documenting states' and the Forest Service's intent to coordinate forest management efforts. NASF and its members stand ready to continue this shared stewardship approach and promote forest management that protects and enhances ecosystems and communities.

**Executive Director**  
Jay Farrell

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We agree that wildfire is the leading threat to mature and old-growth forests, followed by insects and disease, and tree cutting is currently a relatively minor threat (p. 1 *Introductory Report Analysis of Threats to Mature and Old-Growth Forests on Lands Managed by the Forest Service and Bureau of Land Management*). We also agree that proactive stewardship, including commercial timber harvest, is critical to maintaining healthy forests of all ages and can accelerate achieving the desired old-growth conditions sought by the Administration. **We strongly favor the modified proposed action alternative (Alternative 2) to any alternative that would remove commercial timber harvest as a tool** to manage old-growth forests.

We are aware of public campaigns urging the Forest Service to prohibit the use of commercial harvesting in all mature and old-growth forests. We are firmly against the Forest Service adopting any such approach through this NEPA process or at the local planning level. We are concerned that such campaigns may utilize the final EIS and Land Management Plan Amendments to challenge proactive stewardship projects that propose to use the tool of commercial timber harvesting. This could delay projects, increase Forest Service workload with extra NEPA analysis and litigation, and undermine the goal of protecting and enhancing old-growth forests. We are also concerned that implementing the amendments will decrease important projects across the NFS in stands of all ages. Maintaining diverse stands of trees of all ages is a critical strategy to ensure resilience to wildfire, native and non-native insects and diseases. A decrease in proactive stewardship projects on NFS lands could have unintended consequences on forest health and the adjacent communities and non-federal lands.

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

- Developing the *Adaptive Strategies for Old-growth Forest Conservation*, increased monitoring, and training to implement new guidance will all require adequate funding and staff time. NASF is concerned that this additional workload cannot be completed without negatively impacting the planning and implementation timelines of existing and future projects that are critical to forest health and community safety.
- NASF appreciates the Forest Service's efforts to include Objective 2, which requires implementing three proactive stewardship projects within one year of completing the *Adaptive Strategies for Old-growth Forest Conservation*, but we are concerned new projects could delay ongoing projects.
  - We encourage individual forests and/or regions to coordinate with states to ensure these projects incorporate priorities from State Forest Action Plans, complement existing interagency efforts, and do not delay ongoing efforts.
- The DEIS states that 17% of old-growth is in designated areas and 39% is in Inventoried Roadless Areas (p. 79).
  - NASF suggests the DEIS and ensuing Adaptive Strategies for Old-growth Forest Conservation include a more thorough analysis of how these designations limit the ability to perform proactive stewardship in those areas and if this causes a greater need for proactive stewardship in accessible areas.

- The DEIS recognizes that 25% of old-growth exists in the wildland-urban interface and states (p. 99), “modifying fire behavior will remain a priority in the wildland-urban interface (WUI), which is typically, but not always, compatible with stewardship of old-growth ecosystems.” The DEIS also includes exceptions under Standard 2.c, which allows for management other than proactive stewardship when needed. NASF believes the exceptions in Standard 2.c are necessary to meet the needs of local ecosystems and communities. **Furthermore, the exception to allow for wildfire risk management activities that do not meet the definition of proactive stewardship within municipal watersheds or the WUI is absolutely necessary** to meet the objectives of the [National Cohesive Wildland Fire Management Strategy](#) and the Forest Service’s [Wildfire Crisis Strategy](#).

We recommend the paragraph on page 99 be strengthened to read as follows:

- Modifying fire behavior to reduce wildfire risk to communities, critical infrastructure, and other values at-risk identified in Community Wildfire Protection Plans and other locally adopted planning tools will remain **the number one priority** in the wildland-urban interface. Reducing the fire risk is typically, but not always, compatible with stewardship of old-growth ecosystems. In areas where these two objectives are not compatible, standard 2.c will be utilized and wildfire risk reduction needs will take precedence over stewarding old-growth forests.
- NASF supports the exceptions in the DEIS but remains concerned that they will be difficult to implement. 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 (NEPA) 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.
  - We believe the language above, related to standard 2.c, will help reduce those challenges and provide better direction to line officers.
- We previously commented that the language in the Executive Order and Notice of Intent 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 historical old-growth conditions and determine suitable amounts and locations of old-growth and old-growth recruitment.
  - State Forest Action Plans include an in-depth analysis of forest conditions and trends in individual states. We strongly encourage individual forests and regions to coordinate with state forestry agencies and consider state Forest Action Plans while determining appropriate amounts of old-growth, developing *Adaptive Strategies for Old-growth Forest Conservation*, and developing individual projects. Coordination with state forestry

agencies and other stakeholders will help ensure that the benefits from old-growth forests are realized while minimizing unintended negative social, economic, or cultural impacts.

- To reflect the importance of local context throughout the amendment, NASF recommends modifying Objective 4 to the following:
  - "Within ten years of the *Adaptive Strategy for Old-Growth Forest Conservation* being completed, old-growth forest types that have been identified as lacking appropriate amounts within the plan area will exhibit a measurable, increasing trend towards appropriate amounts, representativeness, redundancy, and connectivity of old-growth forest that are resilient and adaptable to stressors and likely future environments as determined through stakeholder consultation."
- The DEIS recognizes that this national effort has reduced trust among many stakeholders (p. 116). NASF and its members are also aware of this and suggest the Forest Service coordinate closely with state and local governments during the development of the *Adaptive Strategies for Old-growth Forest Conservation*.

We would like to reiterate that management decisions of federal old-growth forests and forests of all ages have real social, economic, and ecological impacts to states and local communities, and it is critical that impacts to those stakeholders are considered. Considering the national scope of these amendments it is not possible for NASF to adequately address the quantity and diversity of impacts they would have on individual states and localities, but we do know outsized impacts are expected in certain locations. Individual states, who are better positioned than NASF to make comments on local impacts, will also be submitting comments. Those letters will show some commonality among states and also highlight the differences dictated by local conditions.

NASF welcomes further discussion on the comments and concerns raised in this letter.

Sincerely,



Scott Phillips  
President, National Association of State Foresters  
South Carolina State Forester