



July 18, 2023

Submitted Via: www.regulations.gov

Attention: Christopher Swanston
Director, Office of Sustainability and Climate
U.S. Department of Agriculture, U.S. Forest Service
201 14th Street, NW
Washington, DC 20227

RE: Advance Notice of Proposed Rulemaking (ANPRM), National Forest Management, Climate Resilience

Dear Mr. Swanston:

Please see the below comments from the Hardwood Federation related to the Advance Notice of Proposed Rulemaking (ANPRM) on national forest management and climate resilience, as published in the Federal Register (FR) on April 21, 2023 (See 88 FR 24498). By way of background, the Hardwood Federation is the unified voice of the hardwood industry on federal legislative and regulatory policy. The Federation represents 31 local, regional, and national trade associations that serve hardwood businesses and their employees located in every state in the nation.

The U.S. hardwood sector is a fully integrated industry from logging to the manufacture of finished consumer goods which touch every aspect of American life including flooring, cabinets, furniture and moldings in our homes. Packaging, tissue and paper supplies are made of residual chips and dust from hardwood mills. Industrial mats, shipping pallets and railway ties made from low grade hardwood lumber are crucial to America's vast transportation infrastructure. Hardwood processing and manufacturing entities rely primarily on domestic private and public working forestlands for the raw materials that go into their products. As a threshold matter, the hardwood industry supports active forest management and strong domestic and international demand for hardwood products that capture carbon and promote resiliency and rejects policies that will lead to more restrictions on active forest management.

USFS Must Recognize Carbon Benefits of Sustainably Managed U.S. Forests and a Sustainable U.S. Forest Products Industry as Key Tools to Resiliency

When developing policies related to climate resilient forests, the USFS should acknowledge that sustainable forest management, as is overwhelmingly practiced in the United States, contributes to the health and resilience of forestlands, allows younger, more carbon absorbing trees to grow, and provides financial incentives to landowners to preserve forestlands as forests. The products made from harvested timber stores significant carbon over the lifetime of the products, some of which last for hundreds of years.

American hardwood products made from sustainably harvested U.S. grown timber support carbon storage and sequestration, reducing atmospheric CO² and storing carbon throughout its life cycle from growth, standing, and use in forest products, aiding the climate. Demand for American hardwood finished goods promotes healthy forests, protects water resources, and supports critical habitat and wildlife diversity, while also producing safe and environmentally conscious products that create employment opportunities for our rural communities and supply chains. When there is a steady demand for fiber and the resulting wood products, hardwood operations ensure that forests will remain as forests in the future and are a key element of increasing carbon sequestration levels.

It is important to recognize that the carbon benefits of the forests do not end with tree growth. Markets for products derived from trees are an important piece of the solution as well. Also, wood products are 50% carbon by weight, continuing to store carbon for the life of the product.¹ The Biden Administration and congressional leaders acknowledge that the American forest system is vital to reducing atmospheric carbon, offsetting 12-15 percent of U.S. carbon emissions each year.² They further recognize the role of management, and the role that the forest products industry plays in maintaining the health and vitality of U.S. forests. The Hardwood Federation believes that the Administration cannot implement the April 22, 2022 [Executive Order 14072: Strengthening the Nation's Forests, Communities and Local Economies](#), which forms the basis of the current ANPRM, without acknowledging the lifecycle storage of carbon stored in sustainably harvested and manufactured wood products.

Looking at climate resilience and forestry on a global scale, it's worth mentioning that the Hardwood Federation advocates that the Administration and Congress move forward with full implementation and funding of the Lacey Act, thereby fulfilling a key pillar of Executive Order 14072. The law has proven an effective tool to reduce incentives for international deforestation. USFS Laboratory studies show that the Lacey Act and its amendments have resulted in major decreases in the amount of illegally sourced wood products entering the U.S.

¹ WoodWorks. Carbon Footprint. <https://www.woodworks.org/why-wood/carbon-footprint>

² National Alliance of Forest Owners, Forests and Climate Change for Policymakers 101. [Forests and Climate Change for Policymakers 101 | National Alliance of Forest Owners \(nafoalliance.org\)](#).

market, matched by similar increases in the value of legally sourced wood products. Policies that increase demand for responsibly sourced wood products at the expense of those sourced through untrammled deforestation promote climate resilient forests.

USFS Must Recognize the Complexity and Variety of Forest Systems

In the lead up to the current ANPRM, the USFS has sought input with respect to a single definition of “old growth and mature forests” to inform federal policy to attempt to aid its efforts to promote forest resilience. The hardwood industry opposes application of any definition or related framework for old-growth and mature forests as a tool to undermine effective forest management. Within the context of the ANPRM, the Federation continues to urge the USFS to avoid a “one size fits all” definition of old growth and mature forests in any rulemaking arising from Executive Order 14072. There are multiple layers of geographical and biological diversity and variability of traits that characterize forestland in North America. The volume of this variability should dissuade regulators from pursuing a “one size fits all” approach, which could lead to arbitrary exclusions of acreage from harvest. On August 30, 2022, the Federation submitted comments in response to the Administration’s RFI on [Federal Old Growth and Mature Forests](#) (See 87 FR 42493). The Federation urged the Administration to avoid a single definition and “universal framework” on the same grounds of diversity and variability and incorporates those arguments by reference within the context of the current ANPRM.

While the hardwood industry recommends acknowledgment of the forest management framework outlined above as a basis for all policies intended to promote resilient forests, the Federation also addresses some of the “overarching questions” posed by the USFS within the context of the ANPRM.

Overarching Question #1: *How should the Forest Service adapt current policies and develop new policies and actions to conserve and manage the national forests and grasslands for climate resilience, so that the Agency can provide for ecological integrity and support social and economic sustainability over time?*

As a threshold matter, the hardwood sector reiterates its longstanding position that the USFS should rely on existing authority, especially the National Forest planning process, as the primary tool for promoting effective forest management. More specifically, the Hardwood Federation agrees with comments developed by the Federal Forest Resources Coalition (FFRC) that the key to achieving climate resilience within the national forest system is to take steps to mitigate “catastrophic losses from wildfires [and] insects.” The Hardwood Federation believes that the USFS can best pursue its resilience objectives by implementing forest management best practices, especially through regular and responsible timber harvests and thinning. As pointed out by FFRC, “currently every state where USFS lands make up the majority of timberland are net forest carbon emitters.” The comments further state that according to EPA data, for

example, U.S. carbon emissions from wildfires “increased by more than seven-fold between 2005 to 2018.”³ The USFS must reverse this trend if it seeks to attain climate resilient forests. To achieve its goals, the USFS must first implement existing policies and authorities before issuing new rules that may outline redundant requirements.

Overarching Question 2: How should the Forest Service assess, plan for and prioritize conservation and climate resilience at different organizational levels of planning and management of the National Forest System (e.g., national strategic direction and planning; regional and unit planning, projects and activities)?

The Hardwood Federation has long empathized with USFS staff shortages and recommends that the agency assure that it has enough hands-on deck to manage its existing mandates before embarking on new missions. The hardwood industry shares concerns related to labor force shortages and the limits they impose on effective forest management as outlined in comments developed by the FFRC. For example, USFS personnel have regularly informed stakeholders in a variety of venues, including through congressional testimony, that the Forest Service, like many public and private sector employers, is severely short staffed. As highlighted by FFRC, during [testimony](#) delivered before the Senate Energy and Natural Resources Committee on April 18, Chief Moore stated that his agency confronted challenges related to “workforce capacity” and “high post-fire workloads.” Chief Moore also highlights the difficulty of retaining forestry professionals once hired, pointing out in an [internal memorandum](#) in March 2022 that the agency loses 30% of new hires within the first three years of employment.

Overarching Question 3: What kinds of conservation, management or adaptation practices may be effective at fostering climate resilience on forests and grasslands at different geographic scales?

The Hardwood Federation applauds the agency’s solicitation of feedback related to effective forest management and related practices. While the hardwood sector has outlined in detail the benefits of forest management and practices that promote it within the current exercise and other comments arising from E.O. 14072, we believe it would be instructive to remind regulators that certain practices actually undermine resiliency. By reducing timber harvests, placing arbitrary bans on thinning and pursuing other policies that increase fire risk, the agency can initiate unintended consequences and exacerbate the impacts of hotter summers rather than deploy tactics that mitigate climate change.

³ Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2018 U.S. Environmental Protection Agency April 2020.

Conclusion

The Hardwood Federation appreciates the opportunity to submit these comments, as well as your careful consideration of them. In addition to the comments outlined above, the Hardwood Federation incorporates by reference those comments made by the American Wood Council, Federal Forest Resources Coalition, National Alliance of Forest Owners and the National Council for Air and Stream Improvement (NCASI) as they relate to the role of active forest management in promoting resilient forests.

Sincerely,



Dana Lee Cole, Executive Director
Hardwood Federation

Hardwood Federation Member Associations

Allegheny Hardwood Utilization Group
American Hardwood Export Council
Appalachian Lumbermen's Club
Appalachian Hardwood Manufacturers Inc.
Decorative Hardwoods Association
Empire State Forest Products Association
Hardwood Distributors Association
Hardwood Manufacturers Association
Indiana Hardwood Lumbermen's Association
Kentucky Forest Industries Association
Lake States Lumber Association
Maple Flooring Manufacturers Association
Missouri Forest Products Association
National Hardwood Lumber Association
National Wood Flooring Association
National Woodland Owners Association
North Carolina Forestry Association

Northeastern Loggers Association
Ohio Forestry Association
Pacific Coast Wholesale Hardwood Distributors Association
Pennsylvania Forest Products Association
Penn-York Lumbermen's Club
Railway Tie Association
Southern Cypress Manufacturers Association
Southwestern Hardwood Manufacturers Club
Tennessee Forestry Association
Virginia Forest Products Association
West Virginia Forestry Association
Western Hardwood Association
Westside Hardwood Club
Wood Component Manufacturers Association