NATIONAL ASSOCIATION OF STATE FORESTERS
444 North Capitol Street NW | Suite 387 | Washington, DC 20001 | www.stateforesters.org

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Dr. Seth Meyer
Chief Economist, U.S. Department of Agriculture
Office of the Chief Economist
1400 Independence Avenue, SW
Room 112-A, Mail Stop 3810
Washington, DC 20250-3810

Mr. William Hohenstein
Director, U.S. Department of Agriculture
Office of Energy and Environmental Policy
1400 Independence Avenue, SW
Room 4059, Mail Stop 3815
Washington, DC 20250-3817

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USDA Notice of Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad

Dear Dr. Meyer and Mr. Hohenstein,

The National Association of State Foresters (NASF) is pleased to provide official comments in response to the US Department of Agriculture's (USDA) Notice of Request for Public Comment on the Executive Order on *Tackling the Climate Crisis at Home and Abroad.*

NASF represents the directors of the forestry agencies in all 50 states, eight U.S. territories, and the District of Columbia. State foresters deliver technical and financial assistance to private landowners for the conservation of more than two-thirds of the nation's forests. They also partner with federal land management agencies through cooperative agreements and Good Neighbor Authority to manage national forests and grasslands. All state forestry agencies share a common mission to protect America's forests and most have statutory responsibilities to provide wildland fire protection on all lands, public and private.

America's trees and forests are a strategic national resource with vast potential as solutions for climate change, public health, and economic challenges. Wildland fire is a national crisis – bold action is needed to sustain forests, protect public safety, and prevent the conversion of forests from carbon sinks to carbon emission sources. Active forest management, supported by forest markets, combined with coordinated wildfire prevention, mitigation, and suppression efforts can substantially mitigate the effects of climate change.

For more than a century, state forestry agencies have partnered with the USDA Forest Service (Forest Service) to deliver professional forest management and protection across complex landscapes. With greater federal support, state foresters can leverage more state resources and local partnerships to achieve accelerated forest management and wildland fire outcomes on all lands.

NASF stands ready to work with this administration in providing the forestry leadership our country needs. America's forests are a strategic national asset, renewable resource, and climate change solution that face an array of threats. State forestry agencies are in a unique position to help guide the development of the policies and programs we can use to address these threats from the national level to the grassroots. Please do not hesitate to call on us. In response to USDA's request for stakeholder input we offer the following recommendations:

I. Climate-Smart Agriculture and Forestry Questions:

A. How should USDA utilize programs, funding and financing capacities, and other authorities, to encourage the voluntary adoption of climate-smart agricultural and forestry practices on working farms, ranches, and forest lands?

In order to encourage the voluntary adoption of climate-smart forestry practices, we must first define the term. NASF defines "climate-smart forestry" as forest management that maximizes the carbon benefits of healthy and resilient working forests.

Non-working forests are more likely to be developed and/or converted to other land uses. When forests work, they not only provide us with carbon benefits and jobs, they provide us with the air we breathe and the water we drink, the woodproducts we use every day, and the wildlife habitat vulnerable species depend on.

Climate-smart forestry isn't possible without preserving private ownership rights of landowners and achieving multiple management objectives for keeping forests as forests and keeping them healthy. For this reason, climate-smart forestry should include active forest management to improve the capacity of America's forests and forest products to sequester carbon, produce renewable fuels, and mitigate the effects of climate change.

Increase Support for Programs that Deliver Technical Assistance

The most effective way to encourage private forest landowners to voluntarily adopt climate-smart forestry practices is through technical assistance that equips landowners with the unbiased, science-based information they need to sustainably manage their forests now and into the future.

The best way to provide for increased technical assistance to landowners is by increasing funding and support for the programs that accomplish this work. Proposing increased funding for programs that provide support for private landowners through the President's Budget Request is one way USDA can utilize its authorities to signal support for these programs to Congress.

1. How can USDA leverage *existing* policies and programs to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resiliency to climate change?

Forest Stewardship Program (FSP): Providing private non-industrial landowners with technical assistance is at the core of most state forestry assistance programs and FSP offers a supplemental funding source for this function. Over 10 million non-industrial landowners control 38% of the country's forests and woodlands, yet only a small portion of these currently access technical and financial services through state and federal agencies or other partners. This suggests that most of these lands are not actively managed to maintain health and vigor and are more prone to over maturity, and thus their carbon benefits are not being maximized. **Being able to put more technical assistance on the ground through the nationwide network of state agency foresters is a long-standing need that increased FSP funding could help meet.**

Forest Legacy Program (FLP): With the Great American Outdoors Act (GAOA) signed into law, the Land and Water Conservation Fund (LWCF) will receive permanent annual funding at the full authorized level, nearly doubling historical appropriations for the LWCF. **The Forest Legacy Program should receive significant increased funding levels commensurate with the increased funding provided to the LWCF by the GAOA.** This state-federal program has protected nearly 2.5 million acres of working forests through fee title or permanent easement acquisition. Increased priority should be placed on projects that can demonstrate an increase in carbon sequestration. **USDA Forest Service should increase funding to states to increase greatly needed capacity at the state level to administer the program which would increase project implementation and program success.**

Environmental Quality Incentives Program (EQIP): This program helps landowners pay for conservation practices, such as tree planting and timber stand improvement, which both serve to increase carbon sequestration. Importantly, the program also pays for prescribed fire, which helps manage forest resources for greater resilience. EQIP dollars allocated to forestry practices in 2019 amounted to about $133 million – just 10% of total EQIP funding in 2019. **If combatting the effects of climate change is a national priority, funding forestry practices within EQIP should play a larger role.**

Conservation Stewardship Program (CSP): By acreage, CSP is the largest working lands conservation program in the country. It provides landowners a yearly payment for implementing enhanced conservation practices that go beyond basic conservation standards. Landowners must compete to enter the program and are more competitive if they implement a "bundle" of enhancement practices. Under current regulation, forest landowners only have one bundle option: a set of enhancements aimed at improved wildlife habitat. Enhancement E612A involves converting cropland to trees for water quality protection. This practice would also increase carbon sequestration, but with the greatest volumes being sequestered 10 years following planting. **A new bundle of enhancements should include contract extensions for tree planting and optimal carbon uptake in standing timber. This bundle could be constructed to also improve water quality and wildlife habitat.**

Conservation Reserve Program (CRP): CRP offers an annual payment to landowners who take highly erodible lands out of agricultural production. Various land cover types, including trees, are eligible for the program. **The 2018 Farm Bill increased the overall cap on program acres, but sign-ups have not reached that upper level.** The ranking criteria for "General Sign-up" include air quality improvement, but criteria do not mention carbon sequestration explicitly. **A continued increase in the acreage cap, increasing rental payments, placing greater priority on tree planting and relaxing some of the restrictions that currently discourage the planting and maintenance of tree cover would result in increased carbon storage.**

Regional Conservation Partnership Program (RCPP): RCPP funds a wide diversity of partner-implemented projects. The 2018 Farm Bill gave RCPP a large boost in permanent funding, but as with most NRCS programs, carbon sequestration is not among the "critical conservation concerns" that receive priority funding. **Carbon sequestration needs to be made a clear program objective.**

Agricultural Conservation Easement Program (ACEP): ACEP has an annual mandatory funding allocation of $450 million. The program's purpose is to maintain wetlands and agricultural lands through the purchase of easements from willing landowners. NRCS will pay up to 50% of the fair market value of the easement. NRCS can pay up to 75% where the lands include grasslands of special environmental significance. Lands do not qualify if they are over two-thirds forested. ACEP was intended to combine and take the place of several past NRCS easement programs. Unfortunately, the Healthy Forests Reserve Program (HFRP) was not one of those. **Revisions that would capture the authorities of HFRP and eliminate the limitation on forested acreage would better serve climate change objectives.**

2. What *new* strategies should USDA explore to encourage voluntary adoption of climate-smart agriculture and forestry practices?

Tree Planting, Reforestation, and Afforestation on Public and Private Lands

Nearly all federal programs available to forest landowners support tree planting, but greater funding priority should be given to tree planting activities given the carbon sequestration potential of young trees. Forests in the U.S. sequester between 600 and 700 million metric tons of greenhouse gas equivalents every year, but one analysis showed that an additional 50 million tons per year could be mitigated by reforesting approximately 8 million acres.

Depending on the forest type, reforestation requires anywhere from 300 to 800 seedlings per acre. At an average of 500 seedlings per acre, planting 8 million acres would require 4 billion seedlings. **State-owned tree nurseries would have to increase their annual production of seedlings by 400% over ten years to produce 4 billion seedlings**. **USDA should establish long term seedling purchase agreements with state-owned tree nurseries to meet the needs for reforestation.**

Private nurseries could certainly help, but they are typically growing for contracts with planting dates two years into the future. **A substantial increase in tree planting would necessitate careful**

planning (including climate change informed species selection), advance notice, and funding assistance.

B. How can partners and stakeholders, including state, local and tribal governments and the private sector, work with USDA in advancing climate-smart agricultural and forestry practices?

Forestry assistance is best delivered at the local level, by professionals with boots-on-the ground in the forests and communities where USDA producers and landowners live. Partners like state forestry agencies are essential to delivering USDA technical assistance to landowners. **In their outreach, USDA should recognize the role of state forestry agencies and other partners that operate in landowner assistance and partner with them. These entities should work together to understand and address institutional barriers to all landowners accessing USDA programs.**

In addition to continuing the working partnership between states, the USDA Forest Service, and other partners (formalized through Shared Stewardship Agreements), USDA can work with states to further priorities outlined in state Forest Action Plans. These plans were developed in coordination with all forest stakeholders in each state. The plans prioritize strategies, areas, and actions for all forested land ownership types and were comprehensively revised in 2020. Advancing implementation of these cross-boundary planning tools to improve forest health and wildfire resilience should be a high priority in the promotion of climate-smart forestry practices. NASF's 'Forest-based Solutions for America' document expands further on the importance of Forest Action Plans and Shared Stewardship in promoting partnership to support our nation's forests.

C. How can USDA help support emerging markets for carbon and greenhouse gases where agriculture and forestry can supply carbon benefits?

Concepts from the legislative proposal "The Growing Climate Solutions Act" supported by NASF:

i. Establish a certification program at USDA to help solve technical entry barriers to farmer and forest landowner participation in carbon credit markets:

A Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Certification Program through which USDA will be able to provide transparency, legitimacy, and informal endorsement of third-party verifiers and technical service providers that help private landowners generate carbon credits through a variety of agriculture and forestry related practices. The USDA certification program will ensure that these assistance providers have agriculture and forestry expertise, which is lacking in the current marketplace. **Include state forestry agencies as officially recognized by USDA to serve as third party verifiers.**

Concepts from the legislative proposal "The Rural Forests Markets Act" supported by NASF:

i. Establish the Rural Forest Market Investment Program that offers guaranteed loans up to $150 million (total for the fund, not each loan) for nonprofits and companies to help small and family forest owners create and sell forest credits for storing carbon or providing other environmental benefits. **Include state forestry agencies as eligible entities to receive these loans.**

ii. Provide a climate solution by encouraging forestland owners to adopt voluntary land management practices that draw carbon out of the air and stores it in forests.

iii. Create new revenue streams for small-scale, family forest owners by making it possible to generate innovative credits they can sell in established environmental marketplaces.

iv. Invest in rural communities by reducing the financial risk to private investors who can contribute the upfront financing that makes these projects possible.

D. What data, tools, and research are needed for USDA to effectively carry out climate-smart agriculture and forestry strategies?

Strengthen FIA (from the FCWG Policy Platform supported by NASF)

The Forest Inventory and Analysis (FIA) program provides crucial information to federal and state forestry agencies, industry, academic, and conservation organizations on a wide range of forestry-related topics. Increasingly, FIA is relied on to provide data on the state of the nation's largest carbon sink—our forests—making it an essential component of decisions regarding climate change mitigation and adaptation strategy. **However, the demands for information on forest carbon are becoming more varied and at scales that are problematic to meet with the current design and capabilities of the program.**

Additional statistical research capacity is required to develop and employ the complex cutting-edge statistical imputation and estimation procedures required to produce the level of accuracy that clients are demanding today for smaller geographic areas. The additional analytical capacity will focus research efforts to improve best applications and integration of remote sensing technologies within the FIA program and develop technologies to reduce costs and make it easier to measure and monitor forest carbon (especially for forest inventories and verification). **Using imagery from advanced technologies, especially remote sensing platforms would improve products for decision making by policy makers and managers and enable forest owner participation in carbon crediting opportunities.**

FY21 marked the first year that Congress appropriated the Forest Service budget under a modernized structure. To transition to this new structure, the historical budget for each program account was broken out into three parts: operations (aka cost pools), salaries & expenses, and program dollars. Congress determined its FY21 appropriations levels based in part on an historical analysis performed by the Forest Service that described how FY21 program budgets would have broken out under the previous budget structure. **While the modernized budget structure has resulted in unprecedented levels of transparency—as the FY21 budget was implemented, it became clear that elements of Forest Service analysis were incorrectly estimated. Under the**

new budget structure there is not a dedicated salary & expenses line for FIA, which concerns us. Establishing a BLI for salary and expenses for the FIA program will help ensure that each research station is spending an appropriate amount of salary and expenses funding on FIA, and hiring critical positions to ensure program delivery.

Strengthen the Role of the Resources Planning Act (RPA) Assessment and Associated Forest Carbon Projection Capabilities

The Resources Planning Act (RPA) Assessments and supporting technical reports produced by the Forest Service RPA research team represent a valuable set of scientific information that is underutilized by stakeholders interested in forests, carbon, and climate. Additionally, stakeholder engagement with the RPA Assessments has been lacking in recent years. **In order to enhance utilization and strengthen the role of the RPA Assessments, Forest Service leadership should (1) prioritize engagement with external stakeholders to help direct more timely and responsive RPA research efforts on forest carbon projections and (2) respond to specific policy-relevant questions from interested stakeholders.** In addition, USDA should continue to seek guidance from the expertise of modelers within the USDA Forest Service that specialize in combined ecological/economic "futuring." The modeling work of these scientists is the best way to gauge the carbon impacts of proposed USDA policies in a way that adequately assesses potential economic feedbacks.

E. How can USDA encourage the voluntary adoption of climate-smart agricultural and forestry practices in an efficient way, where the benefits accrue to producers?

Working Forests and Wood Products

Keeping private forests working is essential to securing the economic, environmental, and social benefits trees provide to society at large. **In order to retain and properly care for their forests, landowners need sources of revenue.**

Markets for wood provide that source of revenue and are critical to maintaining the health and sustainability of forests in the United States. They enable the sustainable, carefully planned harvest of trees to optimize stand density and create age class and species diversity: characteristics that are critically important to enhancing wildlife habitat, forest resilience, and balanced harvest cycles. Management strategies focused on resilience may also include creating or retaining suitable pathways for wildlife species migration.

Benefitting economically from forests does not diminish the environmental and social value of forests; in fact, it is key to supporting the delivery of environmental and social benefits. **The readily available raw material that sustains the forest industry is produced by landowners who maintain and manage their woodlands in perpetuity.**

2.Biofuels, Wood, and Other Bioproducts, and Renewable Energy Questions:

A. How should USDA utilize programs, funding and financing capacities, and other authorities to encourage greater use of biofuels for transportation, sustainable bioproducts (including wood products), and renewable energy?

NASF believes it is important to support the research and development of new markets for wood fiber. **Having highly diverse markets increases the options for management. For example, biomass markets provide landowners the necessary revenue to remove certain species and sizes of trees to improve the overall health and vigor of their forest.**

There is a well-established scientific understanding that wood products use less energy and provide greater environmental benefits than alternative building materials. **As a department, USDA should prioritize the procurement of sustainably harvested wood and wood products and make sustainably harvested timber a preferred construction material. USDA should also employ consistent messaging among federal, state, local, university partners to promote the benefits of forest products compared to conventional construction materials. Finally, USDA should explore opportunities with the Department of Housing and Urban Development (HUD) to promote incentives for wood products including mass timber, for use in federally funded urban renewal projects.**

Forest Service Forest Products Programs: The Forest Service supports several efforts that promote wood utilization. These include the **Forest Products Research Lab**, the **Wood Education and Research Center**, **Wood Innovation Grants**, and the **Mass Timber University Grant Program**. These are all valuable efforts that should be retained and built upon.

National Institute of Food and Agriculture (NIFA): A number of universities around the country include forest products technical assistance within their extension programs. These are partially funded by NIFA under the **Renewable Resources Extension Act Program**. Continued funding of this program will also ensure that information gained through forest product research and development efforts is effectively transferred to end users.

B. How can incorporating climate-smart agriculture and forestry into biofuel and bioproducts feedstock production systems support rural economies and green jobs?

Wood should be harvested in a carefully planned manner using best management practices that embody sound science, represent community values, and maintain important environmental benefits. **Standing timber in U.S. forests represent a critical natural resource for providing the nation's wood and paper products and directly supports over 3 million jobs – about 2% of all U.S. jobs.**

<u>Increase the Use of Forest Biomass for Energy</u>

The mitigating effects of forest biomass energy on climate change hinge primarily on forest sustainability, which can be measured with a landscape-level analysis of net carbon sinks and emissions. Biomass made from wood residues and low-quality standing timber is generally

accepted as a "climate-friendly" fuel. **When forests that provide biomass for fuels are managed effectively over time they can be a sustainable form of renewable energy.**

Several different energy applications are emerging and increasing in feasibility. Using **industrial pellets** to generate electricity is widely practiced in other countries, with wood fiber supplied from the Southeastern U.S. **Torrefaction** is a process that uses heat to turn wood into a coal-like substance and is being tested in at least one demonstration project in Oregon. There have also been demonstration projects around the country working on **cellulosic biofuels,** with jet fuel emerging as one long-term use.

Wood Pellets Production

The production of densified wood pellets, particularly for energy generation, has grown dramatically in response to public policy objectives to lower dependence on fossil fuels. A small percentage of pellets are used for wood fired heating. Currently there are 87 operating manufacturing facilities in the U.S. with at least a few more under construction. Annual production capacity is just short of 12 million tons. In February of 2018 facilities purchased about 1 million tons of feed stock. About 18% of the feedstock would be characterized as pulpwood or roundwood and the remaining represented some form of residual material, for example sawdust from a sawmill. About 80% of the pellet production is exported. This is an increase from very negligible production perhaps 15 years ago and projections suggest continued expansion.

Theoretically, if feedstock purchases were in the neighborhood of 15 million tons per year that would be the equivalent wood usage of approximately 10 large capacity papermills.

Cellulosic Biofuels

The US uses over 133 billion gallons of gasoline, 42 billion gallons of diesel and 22 billion gallons of jet fuel every year. Though gasoline consumption is expected to decline over time because of the increasing presence of electric vehicles, the demand for jet fuel is expected to increase and the demand for diesel is projected to remain somewhat constant because of its use in trains and large vehicles. **It has been estimated that, potentially, 1 billion tons of sustainably grown biomass could produce enough fuel to replace 25% to 30% of US demand.**

Currently, cellulosic biomass feedstock costs outcompete average crude oil costs, but refining costs are substantially higher. As a result, there are only a limited number of operational facilities as research continues on processes that economically refine cellulose, hemicellulose and lignin into fuel. It is presumed at this point that successful wood-based processes will focus on jet fuels and the incidental production of marketable by-product chemicals.

Biochar

A by-product from the production of biofuels manufactured through pyrolysis, biochar is a very fine charcoal-like material used to improve soil characteristics. Pyrolysis involves heating wood to extremely high temperatures without oxygen, as the presence of oxygen would cause wood to burn. In this instance it converts into mostly pure carbon. The best biochar is produced at temperatures above 350 degrees centigrade. **As a soil amendment it lowers acidity and tightly binds undesirable metals so that they are not taken up by plants or leached from the soil. It can also increase soil porosity in tight clays or reduce porosity in soils that drain too quickly**

such as sand. It creates a favorable medium for the production of micro-organisms that are beneficial to trees.

Importantly, biochar is principally carbon that is near permanently stored. **As such its greatest potential may be its use for long term carbon sequestration. By working biochar into the soil a source of nearly pure carbon is being incorporated that is not subject to micro-biological activity.** When, for example, wood or some other organic material is incorporated into the soil micro-organisms will eventually break that material down into other compounds, including carbon dioxide which can be released back into the air during soil disturbance.

Where readily available, it has developed market value. Reclamation of oil drilling sites and as a soil amendment for high value crop operations are common uses. Current research is focused on mobile kilns that can be used on site at projects conducting needed thinning of low value timber.

Torrefaction

Torrefaction is also a pyrolysis process, conducted at lower temperatures than for biochar, that yields a product similar to coal. It makes wood a more practical substitute for coal by being easier to grind, simplifying storage and eliminating moisture uptake issues. Though the weight loss in the process is 30%, the energy loss is only 10%. Its energy profile is improved by the fact that torrefaction generates a combustible gas that can be recirculated back into the system and burned to provide heat.

It has the potential to produce a renewable source of fuel for gasification processes used to make biofuels. Analysis has shown that it could also be a more economical alternative for the densified pellet market in places where that market is still developing

Mass Timber

Mass timber is a category of mostly engineered wood building materials that are structural and can be used as floors, walls, ceilings, and beams. These products include LVL, Glulam, NailLam, Mass Plywood Panels (MPP) and Cross Laminated Timber (CLT). CLT is produced in large panels by assembling successive layers of boards perpendicular to one another. **The result is a product that rivals steel in strength and fire resistance. It is lighter in weight than concrete. As such, CLT and other mass timber products can replace concrete and steel in tall structures. Additional benefits include carbon storage and reduced CO2 emissions during construction.** Though more commonly produced and utilized in Europe since the late 1990's it has recently gained traction in the US wood products industry with manufacturing facilities in the Pacific Northwest and a new one starting up in Alabama.

While widespread use of mass timber is good news for the economies in timber producing regions of the country, it also promises some distinctive benefits for builders, communities, and the environment.

Builders, pressured by persistent labor shortages, are finding a wider pool or workers able to safely install mass timber panels. They also report significant labor savings and more efficient and safe job sites. Construction times are reduced by "just-in-time" delivery to job sites and quick installation of panels.

Of course, communities experience less noise and dislocation during construction and, by avoiding the usual stockpile of dimension lumber on site, fire risks are reduced. **The positive environmental attributes of mass timber buildings include a low energy intensity during manufacturing, superior energy efficiency in mass timber structures, and better management of a renewable resource.**

Nanotechnology

There are two different categories of cellulose nanomaterials – cellulose nanocrystals and cellulose nanofibrils – that are produced through different processes. The processes produce microscopically small particles that can be assembled into materials with highly desirable properties. They are lightweight, strong, stable and stiff. **Potential applications include use as a material in paint, coatings, adhesives, a cement additive, lightweight packaging, cell phones manufacturing, composites that can replace plastics in many uses, wound covering hydrogels and others.** Adding nanocrystals to concrete mixes can reduce the volume of cement needed by 15% because of the final material's added strength.

C. How can USDA support adoption and production of other renewable energy technologies in rural America, such as renewable natural gas from livestock, biomass power, solar, and wind?

Biomass power is a necessary and climate-friendly part of transitioning our nation's energy system away from fossil fuels. While many other renewables only operate intermittently (i.e. when the sun shines or when the wind blows), biomass power provides renewable base load energy to sustain the electric grid. USDA can support biomass power by ensuring (1) sustainable feedstock supply from federal lands, (2) private landowners have the technical assistance necessary (through EQIP and Forest Stewardship Program) to produce biomass feedstocks, and (3) biomass industry development is supported through USDA grant programs and research. **Additionally, USDA can promote the adoption of biomass by serving as the subject matter expert and advocate for its place as a climate solution. USDA should counter misinformation disseminated by biomass detractors and be the leader in helping the White House and the EPA understand how sustainable biomass energy fits within the framework of sustainable forest management.**

3. Adressing Catastrophic Wildfire Questions:

A. How should USDA utilize programs, funding and financing capacities, and other authorities to decrease wildfire risk fueled by climate change?

Increase Active Forest Management

Substantial increases in active forest management and fuel treatments across all landscapes and ownership boundaries are needed in the areas at greatest risk for unwanted wildfire. Wildfires in the West may be top of mind, but managing wildfire is a national challenge. **Without an increase**

in coordinated forest management, wildfires will continue to pose a threat to the nation's forests, destroy our cherished communities, and irrevocably alter American landscapes. The scale of wildfires and their community impacts far outpace current efforts to prevent them and mitigate the damage they cause. Fire threats are best addressed by a holistic all-lands approach to wildfire response and proactive forest management across federal, state, and private lands.

Increase Support for State and Private Foresty Programs

Greater support for the State Fire Assistance and Volunteer Fire Assistance programs has significantly increased the number of acreas treated for hazardous fuels. Bolstering support for both of these key programs should be included as part of any national strategy aimed at reducing wildfire risk fueled by climate change. The Forest Stewardship Program and other landowner assistance programs work to ensure that private landowners participate in this all-lands approach. **State and local agencies respond to the majority of wildfires across the country. Attacking wildfires when they are small is the key to reducing fatalities, injuries, loss of homes, and cutting federal fire-fighting costs.**

Fully Implement the Wildfire Funding Fix

In 2018, Congress passed the "wildfire funding fix" to end the practice of "fire borrowing" and to free up hundreds of millions of dollars to increase the pace and scale of restoration projects. Although the "wildfire funding fix" has been implemented with a new cap adjusted suppression and reserve account, additional funding for mitigating restoration work has not materialized in the Forest Service budget. The commonly held expectation was that additional Forest Service mitigation funding would flow into non-suppression programs such as Hazardous Fuels, State and Volunteer Fire Assistance, and S&PF programs, like Forest Health and Forest Stewardship, all of which experienced severe budget shortfalls due to "fire borrowing." **Building a plan for full implementation of the "wildfire funding fix" will be a critical first step in addressing the wildfire emergency.**

Commit to Sustained Investment in Wildfire Mitigation

Wildfires in America are an emergency and should be treated like one. Funding the normal budget line items of the Forest Service and the Department of the Interior each year will not solve – and has not solved – the problem. An off-budget solution that provides reliable funding each year to the Forest Service, the Department to the Interior, and state forestry agencies for the implementation of the highest priority risk-reduction projects is essential to fighting wildfires before they start. **Increased collaboration between federal and state agencies, non-government organizations, local communities, and private landowners – bolstered by a sustained and unprecedented federal investment over the next ten years – is needed to make the difference.**

B. How can the various USDA agencies work more cohesively across programs to advance climate-smart forestry practices and reduce the risk of wildfire on all lands?

Support Acceleration of the National Cohesive Wildfire Management Strategy

The USDA should work with its partners to support the three goals of the Cohesive Strategy: (1) Restore and Maintain Landscapes; (2) Fire Adapted Communities; and (3) Safe and Effective

Wildfire Response. **Through the Wildland Fire Leadership Council (WFLC), USDA can identify opportunities to ensure cohesion across program areas to further these goals with particular emphasis on restoring and maintain landscapes to reduce the risk of wildfire.**

Utilize State Forest Action Plans

State Forest Action Plans are collaborative, priority setting documents that cover all land ownership types within a state. USDA agencies can work cohesively across programs and with state forestry agencies to ensure program dollars are hitting the ground in high priority areas defined in Forest Action Plans. **Active communication with state partners is key to effectively administer programs and investments to reduce the wildfire risk across all lands.**

Increase the Use of Prescribed Fire

There is an immediate need for the return of low intensity fire to our landscapes. The appropriate use of prescribed fire makes our forests and communities more resilient to natural and necessary fire cycles. Increasing the use of prescribed burning depends on partnerships among the U.S. EPA and state environmental protection agencies and a shared understanding that minor planned smoke emissions from prescribed fire pose less risk to human health than mega-emissions from uncontrolled wildfire. The National Prescribed Fire Act offers a legislative solution to increase the use of prescribed fire.

C. What additional data, tools and research are needed for USDA to effectively reduce wildfire risk and manage federal lands for carbon?

Maximize the Benefits of Forests, Including Carbon Sequestration

Forest management is more than carbon management. **Forest managers must consider a site's attributes and its potential for any number of co-benefits, including carbon sequestration, water filtration and absorption, wildlife habitat, recreational opportunities, and wood production.**

Particularly as market capacity grows for forest carbon, it is essential that reforestation and forest management efforts are recognized for what they are: comprehensive environmental solutions with tremendous promise for climate change mitigation and adaption. **Forest management should continue to strive for balanced species and age class diversity – which means a balance of old- and young-growth.**

Young, vigorously growing trees accumulate carbon more rapidly than older trees; they also provide prime habitat for many wildlife species and are fundamental to the resilience and health of a forest. Older trees – no matter the forest type – are important elements of diverse landscapes and responsible for accumulating and retaining a substantial volume of carbon; however, year-over-year, sequester less than younger trees.

Carbon in excess (for instance, when a forest is too densely stocked with trees) can increase the risk of catastrophic wildfire and pest infestations. **Reducing the utilization of forest thinnings, prescribed burns, and harvests in a bid to maintain standing carbon would also undermine forest markets (which are necessary to keeping forests working and as forests) and the well-being of local economies and schools supported by timber revenues.**

Increase the Pace and Scale of Wildfire Risk Reduction

To accelerate wildfire fuels reduction work within priority landscapes, USDA should increase the use of categorical exclusions (CEs) and stewardship contracting (tools allowed by the 2014 Farm Bill and 2018 Omnibus).

To create more sustainable and resilient landscape conditions, the scope, scale, and pace of fuels reduction projects must be made significantly greater, larger, and faster. The NASF recommends that large-scale (15,000 acres +) CEs can be used to this effect. Additional treatments can be accomplished with legislation such as the Emergency Wildfire and Public Safety Act of 2020, which would streamline collaborative wildfire risk reduction projects and accelerate forest management near existing roads, trails, and transmission lines.

Additional funding for the implementation of state Forest Action Plans and Shared Stewardship work would leverage existing and collaboratively set priorities based on the latest data and state-specific needs. Forest Action Plans can – and should – be the roadmap for wildfire risk reduction work nationwide.

D. What role should partners and stakeholders play, including state, local and tribal governments, related to addressing wildfires?

Build Capacity to Support Cohesive Strategy Partners

Collaboration and coordination have already increased as a result of strong partnerships between state forestry agencies, the Forest Service, and conservation partners, but additional resources are needed to truly push this work forward at the pace and scale necessary to protect Americans and their communities. **Building workforce capacity in federal and state agencies, as well as among partner organizations, will need to be a key focus going forward. Making these significant investments in state forestry agencies to support wildfire mitigation projects will not only reduce risk, but create jobs in rural America at a time when they're needed most.** In revising their Forest Action Plans, states have used the most up-to-date information to identify priority areas for this work. The need and priority planning are there; the last pieces of this puzzle are the dollars to get the work completed.

Empower the Wildland Fire Leadership Council to Convene Cohesive Strategy Partners

The Wildland Fire Leadership Council (WFLC) should serve as the convening body for the broad group of partners vital to the National Cohesive Wildfire Management Strategy's (Cohesive Strategy) success. Convened by WFLC, these partners can explore increasing the capacity and involvement of non-governmental organizations and building a larger coalition to support this work at the national scale. **Wildfire management is inherently a partnership effort between federal, state, local, and volunteer agencies and departments.**

Increase Active Forest Management and the Pace and Scale of Cross-boundary Work

Active forest management and fuel treatments are needed across all landscapes and ownership boundaries, but particularly in the areas identified as being the most at risk for wildfire. **Wildfire threats are best addressed by a holistic all-lands approach to wildfire response and proactive forest management across federal, state, and private lands.** To accomplish this, we need

additional funding and to maximize use of the suite of tools, programs, and authorities available to increase the pace and scale of management across ownership boundaries.

Additional funding for Good Neighbor Authority (GNA) projects is needed to support improved federal forest health. **GNA projects are proven to increase the pace and scale of critical forest treatments, support cross-boundary projects and coordination, and provide job opportunities for rural communities.** With additional support, state forestry agencies could hire temporary employees to conduct GNA work that benefits federal lands without supplanting vacant Forest Service positions.

4. Environmental Justice and Disadvantaged Communities Questions:

A. How can USDA ensure that programs, funding and financing capacities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers, and communities?

There are numerous issues that create inequitable access to USDA programs for historically-underserved, largely minority forest landowners. The issue of heirs property, in which multiple heirs own property in common due to the absence of a will(s), is a significant barrier to keeping forests intact. Heirs property issues also affect access to USDA programs (due to lack of clear title to the land), and in the worst cases, lead to the loss of a farm or forestland that may have been in a family for several generations.

USDA programs should recognize in their policies this long-standing institutional barrier to minority land ownership. Additionally, USDA assistance should be targeted to help historically underserved communities receive both farming and forestry assistance, as well as legal assistance to resolve title issues. The Forest Stewardship Program can be a vehicle to support state forestry agencies and non-profits working in this space to reach historically underserved landowners. An example of this important work is the Sustainable Forestry and African American Land Retention Program, a network of eight non-profit organizations across the South working to help landowners address heirs property and land retention issues and responsibly manage their forests.

B. How can USDA provide technical assistance, outreach, and other assistance necessary to ensure that all producers, landowners, and communities can participate in USDA programs, funding, and other authorities related to climate-smart agriculture and forestry practices?

Forestry assistance is best delivered at the local level by professionals with boots-on-the ground in the forests and communities where USDA producers and landowners live. Partners like state forestry agencies are essential to delivering USDA technical assistance to landowners. **In their outreach, USDA should recognize the role of state forestry agencies and other partners that**

operate in landowner assistance and work collaboratively with them to understand and address the institutional barriers landowners face in accessing USDA programs.

Boost Support for Urban and Community Forestry
Nationwide, trees in towns and cities help maximize the lifetime of grey infrastructure, like stormwater systems, and are proven to bolster local economies, sustain green jobs, lower energy production, improve human health, and bring communities closer together. **The USDA has an opportunity to enhance the benefits of urban tree canopies, particularly in socioeconomically disadvantaged neighborhoods, by prioritizing urban and community forestry (UCF) projects.**

C. How can USDA ensure that programs, funding and financing capabilities, and other authorities related to climate-smart agriculture and forestry practices are implemented equitably?

Urbanization, parcelization, fewer mills, on average larger harvesting equipment, harvest quotas, and other considerations have made it so small-acreage landowners are at a considerable disadvantage. Because it is more difficult to secure a return on their management investments, it is harder for them to manage their land sustainably, retain ownership of their land long term, and to keep it forested. It is imperative that USDA seek to ensure smaller landowners have equal access to programs and initiatives created in support of climate-smart forestry.

The USDA should seek the advice and guidance of community leaders on how best to engage marginalized groups. Communities at "high risk" on the Social Vulnerability Index lack resources to respond to the harmful effects of climate change. It is imperative that USDA programs are utilized in these communities.

We thank you for the opportunity to provide public comments and look forward to continuing our strong partnership in stewarding the nation's forests.

Sincerely,

Joe Fox
NASF President
Arkansas State Forester