NAFO
National Alliance of Forest Owners

March 30, 2021

The Honorable Thomas J. Vilsack
Secretary of Agriculture
U.S. Department of Agriculture

Dear Mr. Secretary:

On behalf of private working forest owners across the country, the National Alliance of Forest Owners (NAFO) and allied forestry associations write to express our commitment to help the President achieve the goal of conserving at least 30 percent of our lands and waters by 2030 (30x30), as described in Executive Order No. 14008 of January 27, 2021 on "Tackling the Climate Crisis at Home and Abroad." **As you assess lands and waters, we would like to draw your attention to the positive contribution private working forests can make to enduring conservation outcomes, showing that working lands can be compatible with conservation goals.** We offer the following comments for your consideration as you develop recommendations to implement the goals of 30x30.

The undersigned organizations support, represent, own or manage private working forests across the country. For example, NAFO is a national advocacy organization committed to advancing federal policies that ensure private working forests provide clean air, clean water, wildlife habitat and jobs through sustainable practices and strong markets. The 50 NAFO member companies own and manage more than 46 million acres of private working forests – an area larger than the entire state of Washington – and NAFO's association members represent tens of millions of additional acres of private working forests across the nation.

Approximately 360 million acres – or 70% – of the working forests in the U.S. are on private land, owned by individuals, families, small and large businesses, and Americans who invest in working forests for retirement. Through a continuing cycle of growing, harvesting, and regenerating, private working forests provide 90% of the renewable supply of wood and fiber needed for lumber, paper and packaging, and more than 5,000 items that consumers use every day. Research shows that strong markets for forest products keep private working forests and the economic and environmental benefits they provide intact, preventing their conversion to other land uses.

Private working forests are a critical nature-based solution to many of our most pressing environmental challenges. Combined, our public and private forests sequester enough net carbon each year to offset 15% of U.S. industrial carbon emissions. Over 70% of this net sequestration comes from private working forests. In addition, wood produced from private working forests reduces the carbon footprint of the built environment, because wood used in building construction has low embodied carbon (the amount of carbon emitted to produce it) compared to other building materials, and it stores carbon for long periods of time.

Private working forests are also home to sixty percent of our at-risk species, making them critical to wildlife conservation. Actively managed working forests provide a full range of species habitat, including new regeneration, open canopy, older forest habitats, and riparian habitats protected through the use of best management practices. Private working forest owners share a deep commitment to furthering conservation goals on their lands. **Collaboration between private forest owners and state and federal agencies is proven to drive conservation outcomes, often precluding the need for regulatory listings.**

While state and federal agencies have a mandate to conserve and protect America's wildlife, all Americans can play a role in achieving positive conservation outcomes. Private working forests provide one of the best opportunities for the Biden Administration's 30x30 initiative to achieve wildlife conservation at scale.

The Role of Active Forest Management in Conservation

Active forest management demonstrates how working lands can have effective, positive climate and conservation outcomes. Sustainable modern forestry, including active forest management, on private working forests, ensures that forest health is at the forefront of every management decision to use our renewable forest resources. Private working forest owners in the U.S. implement some of the highest standards of sustainable forest management in the world. To demonstrate just one way working forests provide value, they have shown they can deliver carbon mitigation at scale. Private working forests sequester 7.5 times more carbon than national forests each year. They comprise 56% of the forests in the lower 48 states, but account for 73% of net forest carbon sequestration – enough to almost fully offset carbon emissions from the entire transportation sector each year.

Most forest owners carry out management practices that rely on science to maximize forest health for air and water quality, wildlife habitat, carbon sequestration, and for a sustainable yield of forest products. Such practices help ensure that increased use of wood in construction truly achieves conservation, climate, and other environmental outcomes. Each year, less than 2% of working forests are harvested, and all of that land is replanted to continue the cycle of growth, harvesting, and replanting.

Collaborative Conservation: Example of the Wildlife Conservation Initiative

In support of the 30x30 goal, we want to make you aware of a highly effective, outcome-focused working forests conservation effort called the Wildlife Conservation Initiative (WCI). The WCI is a collaboration between the National Alliance of Forest Owners (NAFO), NAFO member companies, the U.S. Fish and Wildlife Service (USFWS), and the National Council for Air and Stream Improvement (NCASI), together with state agencies and other forest owners, organizations, and stakeholders. The initiative is built upon the premise that private forest owners are critical to wildlife conservation success, that better data informs better wildlife conservation plans, and that active forest management is a proven wildlife conservation tool.

The WCI designs data-driven research to harness sustainable forestry practices that conserve specific at-risk wildlife species while maintaining overall biological diversity at the broad scale. These efforts are critical to landscape scale planning efforts while NAFO member's commitment to third-party forest certification brings certainty to the USFWS and States.

Teams in each USFWS region with NAFO member ownership, composed of representatives from USFWS and other WCI participants, are responsible for designing and implementing projects. Regional projects may be designed to model, assess, and predict future habitat conditions and species distribution at a landscape scale. They may also use active forest management activities to test relationships between management practices and active adaptive management, depending on the species selected for study and the feasibility of each approach.

The WCI has now developed these partnerships with six USFWS regional offices where NAFO members own and manage forestland. Ongoing and planned projects range from habitat and occurrence surveys for gopher tortoise in the southeast to surveys for aquatic, avian and pollinator species in various parts of the country. In addition, WCI engages on continued conservation planning for specific at-risk species such as the Kirtland's warbler, the California spotted owl, and the Pacific fisher. USFWS has recognized the significant contributions of this collaborative effort by contributing funding to carry out several of the research projects on NAFO member lands, leveraging in-kind land access and other contributions from WCI partners. A summary of WCI projects is attached.

To expand the success of the collaborative conservation approach, NAFO has joined with 65 peer organizations to launch a broader effort called Conservation without Conflict (Cw/oC). Cw/oC promotes and encourages voluntary conservation on all lands in addition to private working forests. The goal of Cw/oC, as with the WCI, is to create an enduring culture of cooperation between private landowners, government agencies, and an array of stakeholders that will advance species conservation while maintaining and strengthening the economic, social, and cultural contributions of working lands and the rural communities that support them. To this end, Cw/oC recently hired its first executive director and continues to build the capacity of the effort.

Conservation at Scale: Including All Lands in Federal Conservation Efforts

The federal government already carries out many conservation efforts that encourage private landowners to achieve conservation outcomes. One of the most significant benefits private working forests bring to conservation efforts is scale. Scale in the forest context encompasses broad landscapes across ownerships. USDA and other federal agencies should structure and align existing and future programs to optimize private working forest participation regardless of ownership type or size.

Conclusion

We write to promote the recognition of the conservation values provided by private working forests and the importance of policies designed to keep those forests working.

To effectively achieve the 30x30 goals, we urge you to recognize the conservation values provided by all private working lands. Collaborative conservation efforts are an important tool to harness the scale and knowledge of private landowners. The undersigned organizations stand ready as a resource to the USDA as it seeks to achieve its 30x30 goals.

Sincerely,

Dave Tenny
President & CEO
National Alliance of Forest Owners

Attachment: Wildlife Conservation Initiative Project Summary

The undersigned organizations support this letter:

Alabama Forestry Association
Arkansas Forestry Association
Association of Consulting Foresters
BBC Land, LLC
BTG Pactual
California Forestry Association
Campbell Global, LLC
Caswell Thompson, Inc.
CatchMark Timber Trust
Coastal Forest Resources
Empire State Forest Products Association
Florida Forestry Association
Forest Investment Associates
The Forestland Group, LLC
Forest Landowners Association
Georgia Forestry Association
Giustina Resources
Green Diamond Resource Co.
Hancock Natural Resource Group
Jamestown, L.P.
Lone Rock Resources
Louisiana Forestry Association
The Lyme Timber Co.
Maine Forest Products Council
Massachusetts Forest Alliance
Michigan-California Timber Company
Michigan Forest Products Council
Molpus Woodlands Group, LLC

National Association of University Forest Resources Programs
North Carolina Forestry Association
Port Blakely
PotlatchDeltic
Rayonier, Inc.
Resource Management Service, LLC
Roseburg Forest Products
Sierra Pacific Industries
Society of American Foresters
Superior Pine Products Company
Tennessee Forestry Association
Texas Forestry Association
Timberland Investment Resources, LLC
Virginia Forestry Association
Washington Forest Protection Association
West Virginia Forestry Association
The Westervelt Company
Weyerhaeuser Company

Attachment

The NAFO Wildlife Conservation Initiative
Projects as of March 15, 2021

NAFO and NAFO member companies share a common commitment to wildlife conservation that is both good for the environment and good for business. This commitment forms the basis for the Wildlife Conservation Initiative (WCI), an innovative partnership with the U.S. Fish & Wildlife Service (USFWS), the National Council for Air and Steam Improvement (NCASI), and other organizations focused on voluntary collaborative conservation.

HOW IT WORKS

The WCI starts with a simple question: Which at-risk or listed species under the Endangered Species Act (ESA) are most important to both the USFWS and NAFO members and, among those, which will yield the most scalable conservation outcomes for other species? WCI participants have explored these questions with USFWS leadership at the regional and field office level in every region with NAFO member company forest ownership. Participating regions include:

Region 1 (former Region 5): North Atlantic–Appalachian
Regions 2 and 4 (former Region 4): South Atlantic–Gulf and Lower Mississippi Basin
Region 3 (former Region 3): Great Lakes
Region 6 (former Region 2): Arkansas–Rio Grande–Texas–Gulf
Region 9 (former Region 1): Columbia–Pacific Northwest
Region 10 (former Region 8): California–Great Basin

To make the WCI work, NAFO members provide shape files of their holdings to NCASI, which then uses those files to provide information to the USFWS for project development. Every effort is made to coordinate projects with the work of other relevant stakeholder groups such as the National Fish and Wildlife Foundation, American Bird Conservancy, the Sustainable Forestry Initiative and regional and local collaboratives. Projects on similar species or species straddling regional boundaries are also closely coordinated to optimize effectiveness. The WCI has already produced species conservation successes and has projects for 2021 in every USFWS region with NAFO ownership. In addition to ongoing work on individual species conservation, the WCI develops landscape projects to validate the importance of active forest management for at-risk and listed species conservation with funding grants primarily from the USFWS with contributions from NCASI.

CONSERVATION OUTCOMES

The WCI is achieving collaboration in every region with NAFO member company ownership, including the following, listed according to their current region designation:

Region 1

Wood Turtle: The WCI helped organize a watershed pilot project in Maine with the Maine Department of Inland Fisheries and Wildlife, NCASI, the Natural Resources Conservation Service, the USFWS, and other stakeholders to consider the contributions of forest management to conservation of the wood turtle. Outcomes are being assessed. Additionally, NAFO members and USFWS are exploring the feasibility of reintroducing confiscated wood turtles from USFWS law enforcement cases onto members' lands.

Three Conservation Projects in West Virginia: NAFO members, NCASI, the West Virginia Department of Natural Resources and USFWS are working on three conservation projects in

West Virginia involving the small-whorled pogonia, a listed species; golden-winged and cerulean warblers and wood thrush; and the candy darter and the Big Sandy and Guyandotte crayfish, also listed species. These projects include population monitoring and assessing the habitat conditions where the species are found.

Region 3

Kirtland's Warbler: Through a dialogue coordinated with the WCI, the USFWS welcomed private forest owner involvement in its announcement to delist the Kirtland's Warbler from the List of Endangered and Threatened Species. As the Kirtland's Warbler, which makes its home exclusively in jack pine forests, continues its recovery, private forest owners in Michigan and Wisconsin have committed to work with the USFWS and state agencies to develop forest management strategies on their jack pine forests.

Wood Turtle: A team from Michigan State University was awarded a three-year contract for wood turtle surveys on NAFO lands in the Upper Peninsula of Michigan, which will help inform the USFWS Species Status Assessment (SSA) being done for the wood turtle in FY 2023, thereby ensuring the best science is used in the ESA listing decision. The field team has completed its analysis of data from the first field season and is developing plans for its second.

At-Risk Bats: USFWS is reviewing the conservation status of three at-risk bat species in the eastern United States: the northern long-eared bat, tricolor bat, and little brown bat, all of which are threatened by the white nose syndrome, which affects the bats during their winter hibernation. WCI maintains a dialogue with USFWS on the summer habitat benefits provided by working forests as it assesses these species.

Regions 2 & 4

Gopher Tortoise: USFWS is conducting an SSA of the gopher tortoise in both the listed portion of its range and the remainder where the species is under a petition for listing. The WCI has provided tortoise data to inform the SSA, including data obtained by researchers from the Georgia Department of Natural Resources, who were granted access to WCI land to conduct inventories of tortoises, their burrows, and their movements. The WCI has also helped the USFWS coordinate outreach to other private forest owners to collect additional data. WCI members are now participating on the habitat committee for the SSA.

Southeast Landscape Science Project: In 2020, the WCI awarded the contract for sustainable forest practices and at-risk species conservation on WCI lands in the Red Hills region of Alabama and Florida. The goal of the project is to make direct linkages between sustainably managed forests and species persistence. Field work began in the fall, focusing on mussels, the Red Hills salamander, turtles, the gopher frog, the gopher tortoise, other upland reptiles (primarily snakes), and bats. The project surveyed sites using various sampling methods (eDNA, trapping, camera trapping, and visual surveys). The results are being assessed and 2021 field surveys are being planned.

Best Available Science: USFWS is reviewing the status of numerous aquatic and riparian species throughout the Southeast. In addition to enabling research on these species, the WCI is working with the USFWS to recognize Best Management Practice studies as "best available science" under the ESA and appropriate for conservation agreements and rules.

Red-Cockaded Woodpecker (RCW): The WCI has provided communications support to USFWS as it considers its proposal to redesignate the RCW from an endangered species to a threatened species under the ESA.

Mussels: Freshwater mussels are of continuing conservation concern for the USFWS. The WCI is pursuing opportunities for additional mussel surveys on NAFO member lands in Alabama and Mississippi, including potential reintroductions.

Region 6

Mussel Surveys: The WCI is working with USFWS, Texas state agencies and NCASI to develop projects for mussel surveys in east Texas. The first effort will be a for the Texas heelsplitter and the Louisiana pigtoe on the Louisiana portion of the east Texas watersheds. The surveys will complement ongoing surveys using established protocols and is coordinating with the Louisiana Department of Wildlife and Fisheries.

Region 9

Pacific Fisher: The WCI assisted USFWS and NAFO members in the announcement when the agency approved the Fisher Candidate Conservation Agreement with Assurances in Oregon. These commitments by NAFO members and the information on which they are based, in Oregon as well as California and Washington, informed the USFWS understanding of fisher status and populations. USFWS ultimately listed the southern population in California outside the range of WCI forest ownership.

Pollinators: This project, developed by USFWS and NCASI, will collect information on at-risk pollinator species' richness and diversity in selected stands on NAFO lands in Oregon within sub-basin watersheds that differ in average stand age using sweep net capture methods.

DNA Metabarcoding: The WCI will implement a project that will use DNA metabarcoding on data previously collected by NCASI on NAFO member land in Oregon to evaluate plant relationships with at-risk bees. A companion project will collect data on NAFO member land in Oregon to conduct DNA metabarcoding to evaluate diet sources for the Humboldt marten, a listed species, and to determine species preying on the marten.

Region 10

Conservation Agreements: The WCI supported approval of the Sierra Pacific habitat conservation plan (HCP) that covered the California spotted owl. The science developed for this HCP in turn contributed to the USFWS decision that listing this species was not warranted. Similar agreements with Sierra Pacific and with Green Diamond contributed to the decision by USFWS not list the Pacific fisher population in northern California. Consistent with WCI, these NAFO members have developed, with USFWS, the National Marine Fisheries Service, and the California Department of Fish and Wildlife, various conservation agreements for a variety of other listed and at risk species in California, including red tree vole, Humboldt marten, northern spotted owl, and salmon and allow access to their land for research and reintroduction of species such as the fisher and California condor.

Pollinators: A second pollinator survey project will be conducted on NAFO lands in California. The surveys will cover a variety of management practices, including fire breaks. This is separate from but coordinated with the Region 9 project. Both projects will also complement other efforts by state and federal agencies.

Western Pond Turtle: This project will survey NAFO members lands for occurrence of the at-risk western pond turtle, which will help determine the distribution of extant and viable populations on forested lands. Additionally, the project will assess how extensive the threat from nonnative aquatic species is to turtles on forested lands.