



## THE LARCH COMPANY

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TO: Interested Parties  
FROM: Andy Kerr  
RE: An Informed Guestimate of the Amount of Infrequent-Disturbance Forest Types and  
Frequent-Fire Disturbance Forest Types on the National Forest System  
DATE: 2 March 2023 (Revision 3)

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For the prospective federal older forest conservation rule(s), it has been tentatively decided to seek *stand*-level protection for infrequent-disturbance forest types and *tree*-level protection for frequent-fire disturbance types.<sup>1</sup>

Federal public lands within that National Forest System presently includes 188,498,146 acres.<sup>2</sup> (This analysis only considers the National Forest System administered by the USDA Forest Service. Also to be proposed for similar protection are older forests and trees on lands administered by the USDI Bureau of Land Management.) As a great deal of America’s national “forest” is above timberline (rock, ice, and tundra) or is non-forested (grasslands, shrublands, scrublands, scablands, wetlands, etc.), only 75%, or 143 million acres, is “forested” (Table 1).

Table 1 lists 26 “forest-type groups” as defined by the Forest Service in its Forest Inventory and Analysis (FIA) Program.<sup>3</sup> I have assigned whether the broad FIA forest type group is most appropriately categorized as either an infrequent-disturbance forest type or a frequent-fire-disturbance type. The results are 68% and 32% respectively.

*Caveat:* This is a rather gross categorization of the FIA’s classic 26 forest-type groups. There generally many forest types in each forest-type group. Another Forest Service program, the *Forest Atlas of the United States*, groups 140 forest types into 28 forest type groups.<sup>4</sup> Categorization of each forest type into a disturbance regime will likely result in somewhat different numbers. In 2021, the FIA Program expanded their forest-type groups to offer more refinement to the rather generic “woodlands,” better recognize forest types in Puerto Rico and Hawaii and recognize additional US mainland forest-types.

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<sup>1</sup> Kerr, Andy. 2020. [A Statutory or Regulatory Definition of Two Forest Archetypes Applicable to Federal Forest Policy Nationwide: Frequent-Fire Forests and Infrequent-Disturbance Forests](#). The Larch Company, Ashland, OR and Washington, DC.

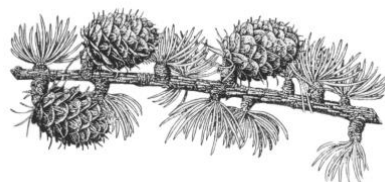
<sup>2</sup> USDA Forest Service. 2022. [Land Areas of the National Forest System: As of September 30, 2022](#) (pdf).

<sup>3</sup> USDA Forest Service. [Forest Inventory and Analysis National Program](#) (webpage).

<sup>4</sup> USDA Forest Service. [Forest Atlas of the United States](#) (webpage).

**Table 1. Area of FIA Forest-Type Groups in the National Forest System by Infrequent-Disturbance or Frequent-Fire Forest Category (000 acres)**

FIA Forest-Type Group	Disturbance Regime	
	Infrequent-Disturbance	Frequent-Fire Disturbance
<i>Western</i>		
Douglas Fir	19,148	
Ponderosa Pine		12,078
Western White Pine	209	
Fir-Spruce	24,033	
Hemlock-Sitka Spruce	13,655	
Larch		1,171
Lodgepole Pine	11,620	
Redwood		20
Other Softwoods	9,845	
Western Hardwoods	12,411	
Pinyon-Juniper		10,012
Non-stocked	[5,609]	
Woodland		3987
<i>Subtotal (West)</i>	90,921	27,268
Total (West; All Types)	118,189	
Western Percentage Split	77%	23%
<i>Eastern</i>		
White-Red-Jack Pine		1,365
Spruce-Fir	1,616	
Longleaf-Slash Pine		1,192
Loblolly-Shortleaf Pine		3,509
Oak-Pine		2,040
Oak-Hickory		8,581
Oakgum-Cypress	516	
Elm-Ash-Cottonwood	502	
Maple-Beechwood	3,534	
Aspen-Birch		1,955
Other Forest Types	161	
Non-stocked	[86]	
Woodland	[0]	
<i>Subtotal (East)</i>	14,910	10,061
Total (East; All Types)	24,971	
Eastern Percentage Split	25%	75%
Total (East and West)	<b>105,831</b>	<b>37,329</b>
<b>Grand Total (East and West; all types)</b>	<b>143,160</b>	
National Percentage Split	68%	32%
<i>Source: Oswalt, et al. 2019. Forest Resources of the United States, 2017. USDA Forest Service (Tables 5 and 6). Disturbance type determined by Kerr.</i>		



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