



Shaping the future for birds

August 16, 2022

Jamie Barbour
Assistant Director, Ecosystem Management Coordination
USDA Forest Service
Washington, D.C. 20250

Executive Order Strengthening the Nation's Forests, Communities, and Local Economies
Request for Information (RFI) on Federal Old-growth and Mature Forests
Submitted electronically to: <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

Dear Assistant Director Barbour:

On behalf of the American Bird Conservancy (ABC), thank you for this opportunity to comment on definitions of federal old-growth and mature forests. ABC is a nonprofit conservation organization with the mission to conserve native birds and their habitats throughout the Americas. We work in numerous regions across the U.S. to recover and sustain healthy bird populations, and are particularly focused on addressing the loss of nearly 3 billion birds as detailed in the [2019 Science publication](#) that includes bird declines of 29% in western forests and 17% in eastern forests. Our comments focus on the value and role of old growth and mature forests to birds, but we recognize the many values of those forests to biodiversity, spiritual and cultural traditions, human health and well-being, and ecosystem services.

Old growth and mature forests are critically important to recovering and sustaining a number of bird species of conservation concern in the U.S. ranging from Marbled Murrelets and Northern Spotted Owls in the old growth forests of the Pacific Northwest and northern California to Cerulean Warblers and Wood Thrushes in mature forests of the eastern U.S. These are but two examples of bird species dependent on the myriad forest and woodland types that occur across eastern and western landscapes that are also critically important for carbon storage needed for adaptation and resilience of ecosystems and species in the face of climate change.

Given the wide range of variability and complexity of factors that characterize old growth and mature forests across the U.S., no one definition will suffice to cover all conditions. We, therefore, encourage USDA to employ a number of criteria in developing the definitions for these forest conditions. All these forests have definable structural characteristics, often support high biodiversity and serve as important sources of water. A number of attributes can help define ecologically mature forests including community type; regionally appropriate bird, wildlife, tree and other plant species indicative of a healthy system; seral stage or climax age specific to each forest type; conditions required for forest regeneration; and landscape composition that includes varying age classes within old growth and mature forests as well as surrounding forests.

The definition of old growth and mature forests should inform management decisions rather than preclude management options. Variability of old growth and mature forests needs to be considered when developing definitions for purposes of management, restoration, protection and other conservation needs. Some of the most steeply declining bird species require early seral forests, and landscapes must include the full spectrum of forests from young forest to old growth. The definition framework should provide for old growth and mature forests purposefully across different forest types and conditions, and not just where older forests remain. Dominant tree species of different forest and woodland communities have very different lifespans, and the natural longevity of each of those tree species should be considered when determining old growth, with rotation ages adjusted accordingly.



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Forest bird data clearly demonstrate that many forest birds require diverse forest conditions including multiple age classes and varying structural conditions interspersed at scales that align with their movement ecology. We acknowledge that we have much more forest that can be considered mature rather than old growth, and that the latter would typically occur in places that were not widely cut or where fire was suppressed following European settlement. We encourage identification and mapping of those forests that currently can be classified as true old growth, and protecting them and the ecological processes that have shaped them over evolutionary time. We support efforts that find a balance between moving some existing acreages of mature forests toward ecologically sustainable old growth conditions while also regenerating some existing mature forests. By doing so, USDA and DOI can better ensure that all forest age classes and seral conditions are available in ecologically meaningful quantities in perpetuity on federal lands. ABC also recognizes the tremendous value of privately-owned working forest lands that may not reach mature or old growth conditions. These forests can complement old growth and mature forests ensuring diverse forested landscapes. We support research needed to understand the value of all forests in terms of the economic impact through ecosystem services.

Strategies that consider carbon storage and sequestration as well as biodiversity conservation should be factored into management decisions going forward and should be informed by the definitions of old growth and mature forests.

Forests play a critical part in storing and sequestering carbon and should contribute substantially to mitigating climate change. Carbon storage has been well documented in the old growth forests of the Pacific Northwest. Vigorously growing young forests sequester large quantities of carbon. We support the allocation of resources needed to better understand potential carbon storage and sequestration so that those strategies can be inclusive and robust. Climate change is likely to have dramatic effects on forest and woodland community composition and structure, and we also encourage use of ecological and spatial models that can account for forest age structure, succession, disturbances, and species response and migrations across large spatial scales to inform decision making.

American Bird Conservancy values the contributions of federal lands managed by the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) to conserving birds and biodiversity. We applaud your efforts to develop objective and scientifically based definitions for old growth and mature forests and appreciate the opportunity to comment on those definitions. We look forward to continuing to work with USFS and BLM to provide for birds and the many other values provided by those lands. If we can be of further assistance, please contact Shawn Graff, Vice President for U.S. and Canada Conservation Programs: sgraff@abcbirds.org, (262) 707-5700.

Sincerely,

Michael J. Parr
President