



Pheasants Forever, Inc. and Quail Forever
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August 29, 2022

Mr. Christopher French
Deputy Chief, National Forest System, Forest Service
Ms. Tracy Stone-Manning,
Director, Bureau of Land Management

(Submitted via CARA: <https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>)

RE: Request for information on federal old growth and mature forests (Executive Order 14072)
#NP-3239

Dear Mr. French and Ms. Stone-Manning:

Pheasants Forever Inc. and Quail Forever (PF/QF) appreciates the opportunity to provide comments on the Request for Information (RFI) on federal old growth and mature forests (#NP-3239). PF/QF has a nationwide network of 750 community-based chapters, over 400,000 members and supporters, and a mission to conserve pheasants, quail, and other wildlife through direct, on-the-ground habitat improvements, public access, education, and conservation advocacy. In pursuit of our mission, we employ a team of over 235 natural resource specialists with expertise in conservation planning, wildlife biology, range management, forestry, and precision agriculture technologies. We provide and support conservation delivery, conservation technical assistance, and conservation planning on both public and private lands across the country. We develop wildlife habitat projects that enhance biodiversity and also sequester carbon, protect soil, improve water quality, and contribute broadly to a healthy environment, people, and prosperous communities.

We understand the focus of the RFI is to inform your response to Section 2(b) of [Executive Order \(EO\) 14072](#) on Strengthening the Nation's Forests, Communities, and Local Economies, which calls on the Secretaries of Agriculture and the Interior, within one year, to "define, identify, and complete an inventory of old-growth and mature forests on Federal lands." Developing a universal definition for old-growth and mature forests is a challenging task on its own. This challenge is compounded by the need to guide an inventory, which requires the defining characteristics to be sufficiently distinct and feasible to measure systematically. Finally, the definition and inventory must address the subsequent needs identified in EO 14072 Section 2(c), including "consideration of climate-smart stewardship of mature and old-growth forests" and development of policies "to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands." To inform future policy and management, the definition and inventory must identify characteristics that relate in meaningful ways to the diverse uses and values that federal forest management

supports through a commitment to sustainable multiple-use. With this in mind, we submit the following considerations.

Wildlife Habitat

The simplest approach to designate “old-growth” based solely on the age of trees would fail to meet the need to inform habitat management decisions that support wildlife conservation and wildlife-related recreation. Age must be considered along with the influence of tree species, community type, soil, climate, and stand density of living trees (as well as density and composition of snags and coarse woody debris) as interacting factors that influence important wildlife habitat characteristics.

Climate-Smart Management

If the definition and inventory of old-growth and mature forests are to help institutionalize climate-smart management of federal forests, they must assess factors critical for that purpose, such as those that influence the resilience of these forest types to changing climate and frequency and severity of fires, pests, and pathogens, and both their rates of carbon sequestration and capacity for carbon storage.

Relation to Existing Data and Plans

Collecting and assessing data and developing and implementing plans incur financial and personnel costs. To be most effective and efficient, the definition, inventory, and future policies should complement existing data and plans, such as tools and frameworks of state, county, and tribal agencies. Many states define old-growth forests by ecological characteristics, using an “old-growth structure index” (OGSI) and definitions that frequently align with existing Forest Service Natural Range of Variation designations. State Wildlife Action Plans and State Forest Action Plans also provide helpful resources to consider both the distribution of old-growth and mature forest characteristics across other public lands, and the threats to these forest types and their corresponding conservation values.

Relevance at the Landscape Level

Old-growth and mature forests do not contribute to the range of multiple-use forest benefits in isolation from the surrounding landscape, and threats to their sustainability are not isolated to influences within their boundaries. To facilitate climate-smart management and conservation at the landscape level, interactions with adjacent forest stands and communities must be assessed. We are concerned that a preoccupation with carbon storage in mature and old growth forest can overlook the importance of other nature-based solutions, particularly the [carbon storage benefits of grasslands, wetlands, and soils in general](#), which are often overlooked in public deliberations that tend to focus on carbon storage in aboveground flora.

Addressing and Adapting to Change in Species Distribution

The definition of old-growth and mature forests should not restrict the ability to manage forests or remove trees that expand to regions or sites beyond their native range. For example, the removal of piñon pine, western juniper, and eastern redcedar that have expanded into grasslands and shrublands in the West is critical to [our efforts to conserve sage grouse and the](#)

[sagebrush ecosystem](#). Though the definition of old-growth and mature forests should consider that climate change will impact future distribution of vegetative communities and species, the definition and future policies it influences should not create additional conservation threats to species already impacted by landscape changes – whether driven by climate change or otherwise.

Once again, PF/QF appreciates the opportunity to provide comments and we respect the importance of this endeavor. We would be happy to provide additional documentation or resources, or to make our team available for discussion about your approach to meeting the orders of EO 14072 and the broader obligations of addressing and adapting to climate change through your management of National Forests and Grasslands. If we may be of assistance, you may reach Brent Rudolph, Director of Sustainability Partnerships, at BRudolph@PheasantsForever.org.

Respectfully,

A handwritten signature in black ink that reads "Ron Leathers". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

Ron Leathers
Chief Conservation Officer
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