August 30, 2022

Chris French, Deputy Chief
National Forest System, Forest Service

Tracey Stone-Manning, Director
Bureau of Land Management

Via: https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239

RE: Request for Information on Federal Old-growth and Mature Forests (E.O. 14072)

Trout Unlimited (TU) is the nation's largest coldwater conservation organization with more than 350,000 members, supporters, volunteers and advocates. Our mission is to bring together diverse interests to care for and recover rivers and streams so that our children can experience the joy of wild and native trout and salmon. Our vision is for communities across America to engage in the work of repairing and reviewing our rivers, streams, and other water bodies on which we all depend. Trout Unlimited has enjoyed a long and successful partnership with both the U.S. Forest Service (Forest Service) and the Bureau of Land Management (BLM) to successfully conserve important fish and wildlife habitat, promote clean water, restore and reconnect impacted waters and landscapes, and to help promote more resilient communities and economies in the face of a rapidly warming climate.

On behalf of our members and supporters across the country, TU writes to express our strong support for President Biden's *Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies* (E.O. 14072), and its specific focus on managing mature and old-growth forests to "retain and enhance carbon storage; conserve biodiversity; mitigate the risks of wildfires; enhance climate resilience; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable local economic development."

Trout and salmon are on the front lines of climate change. Already, nearly every western native trout has been proposed for listing under the Endangered Species Act and more than 100 stocks of Pacific salmon have gone extinct. Hundreds more are imperiled. This is a clear indication that our nation's cold, clean waters, as well as the communities that rely on them, are in trouble. Adding climate change to the long list of threats from road building, dredging, damming, mining, invasive species, and irrigating, is only exacerbating the problem.

Intact ecosystems with high biodiversity are most effective at carbon storage.[1] When we protect mature and old-growth forests that are the sources of our country's mighty rivers, reconnect areas downstream, and restore watersheds, we are helping to mitigate the impacts from climate change by sequestering carbon and improving nature's resilience to the more intense floods, more frequent and damaging wildfires, and prolonged drought brought on by climate change.

With this in mind, TU provides the following specific recommendations for how the Forest Service and BLM should manage mature and old-growth forests in response to the executive order:

I. The Forest Service and BLM Should Promulgate a National Rule for the Conservation of Mature and Old-growth Forest.

The 2001 Roadless Area Conservation Rule (Roadless Rule) has succeeded in conserving some of the most important backcountry public lands in the nation. More than 20 years later, the Roadless Rule remains a model for public land conservation. Yet, more needs to be done to ensure our public lands and neighboring communities will be resilient in the face of climate change. We have already logged the vast majority of our nation's forests. We need to protect those old-growth stands that remain while also allowing older stands to mature and regain their old-growth characteristics.

Using the Roadless Rule as a model, the Forest Service and BLM should develop and promulgate a rule to conserve mature and old-growth forest. Mature forest should be defined based on the age of the stand, but that age-based definition should take into account the old-growth characteristics a stand exhibits given local and regional environmental factors. Some of the important old-growth characteristics to consider in developing the definition of "mature" include: (1) the contribution to carbon storage and sequestration; (2) the value to fish and wildlife; (3) the role in providing clean water; (4) the complexity and diversity of the stand; (5) the connectivity to adjacent old-growth; and (6) other characteristics that Forest Service and BLM researchers, or the public, may identify.

II. Conservation Strategies Need to Apply to Mature Forest as well as Old-Growth Forest.

Despite having been logged in the past, stands of mature forest are important to fish, wildlife, local communities and economies, and critical in mitigating the impacts of climate change by improving resiliency and carbon sequestration and storage. A new mature and old-growth forest rule should be designed to allow these mature stands to regain old-growth characteristics and be managed with restoration, recreation and resiliency at the forefront. Additionally, because large trees tend to grow in highly productive areas, many of the most important areas for fish, wildlife and local communities were logged first. This means that any conservation strategy that fails to protect mature stands will also fail to protect areas that once were, and could be again in the future, our most productive and ecologically important lands and waters.

[1] Dinerstein, E. et al., 5 Sci. Adv. 4 (2019).

These principles are especially true on the Tongass National Forest in southeast Alaska, where many of the best and most productive areas for fish and wildlife were logged first (some as recently as the 1970s) and are now regaining old-growth attributes at the same time they are becoming commercially viable for second growth logging. Although logging has removed just 12% of the productive old-growth forest on the Tongass, it has targeted the best areas and reduced "the highest volume of contiguous old growth by 66.5%."[2] On Prince of Wales Island, where logging has been most intense, "such forests have been reduced by 93.8%."[3]

III. Mature and Old-Growth Forest Should be Managed for Restoration, Recreation and Resiliency.

Mature and old-growth forest is essential for the health and resiliency of nearby communities and economies, for clean water, and for the continued productivity of our fish and wildlife. When making decisions about how to manage mature and old-growth forests, the new mature and old-growth forest rule should require agencies to prioritize economic development opportunities that have broad community support, help mitigate impacts from climate change and promote resiliency, and support fish, wildlife, clean water, recreation, and the cultural values of the forest. The largest economic driver on public lands across the country is recreation, which in many instances requires the conservation of mature and old-growth forest.

Future mature and old-growth harvest should occur only where necessary to protect public safety or where it would be incidental to a project designed to promote restoration, recreation and resiliency. Projects that have a primary purpose to harvest mature or old-growth forest for commercial forest products should be prohibited. Examples of mature and old-growth harvest that TU supports include harvesting individual mature or old-growth trees for cultural or traditional uses, or removing trees where wildfire suppression activities have allowed certain species to encroach beyond their natural range, to protect public health, or within the wildland-urban interface where needed to mitigate the risks from catastrophic wildfire.

To mitigate the impacts of catastrophic wildfire on forest health, harvesting activities should focus on removing young trees to protect or restore mature and old-growth forests as well as communities. In addition to mechanical thinning, agencies should reintroduce fire to fire-adapted forest systems.

IV. Partnerships can help Restore and Conserve Mature and Old-growth forest.

Activities to restore forest health should be accompanied by actions that improve the resiliency of aquatic ecosystems so they are better able to withstand the impacts of fire and climate change. To

[2] Albert, David M. and John W. Schoen, 27 Cons. Bio. 4 at 779 (2013).
[3] *Id*. at 780.

this end, TU is committed to fully implementing the Bipartisan Infrastructure Law (BIL) with our agency partners. With the support of BIL, we are scaling up efforts to increase connectivity and address existing aquatic habitat degradation and impairments to help mitigate the short-term effects of forest management activities, lessen wildfire impacts, and help to build long-term resiliency of fish populations. The executive order emphasizes "reforestation partnerships" with public and private partners. Trout Unlimited and its 350,000 members, supporters, volunteers and advocates stand ready across the nation to assist in this effort. In 2020, Trout Unlimited reconnected and restored over 1,400 river miles, and volunteers performed more than $9.7 million in service to their communities.

V. Planning Should Consider Carbon and Climate Impacts.

The science surrounding our changing climate and carbon impacts is advancing faster than our planning processes can keep up. In advance of any future timber sale of trees of any age, or other projects that involve the harvest of mature or old-growth trees, the relevant agency should assess carbon and climate impacts of the project and then ensure the project does not negatively affect carbon sequestration, climate resiliency, or the affected forest stand's ability to help mitigate impacts from climate change. If the United States is encouraging other nations not to harvest mature and old-growth forest due to the effects on climate change, we should lead by example in how we manage our domestic forests.

VI. The Forest Service Should Reinstate the Roadless Rule on the Tongass.

In response to a petition from the State of Alaska requesting the U.S. Department of Agriculture (USDA) to exempt the Tongass from the Roadless Rule, the USDA issued a final rule and record of decision for the so-called Alaska Roadless Rule that exempted the Tongass from roadless area protections.[4] This decision was politically motivated, ignored the Forest Service's own science, and went against the will of more than 96% of all public comments. The USDA has since solicited public comment to reverse that decision[5] and announced the Southeast Alaska Sustainability Strategy, which among other things announced that the "USDA will end large-scale old growth timber sales on the Tongass National Forest and will instead focus management resources to support forest restoration, recreation and resilience, including for climate, wildlife habit and watershed improvement."[6] The USDA should reinstate the roadless rule on the Tongass. Additionally, the national rule on mature and old-growth forest should apply to all Forest Service and BLM lands so that it solidifies the goals of the Southeast Alaska Sustainability Strategy across the nation.

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[4] USDA, Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska, 85 FR 68688 (Oct. 29 2020).

[5] USDA, Special Areas; Roadless Area Conservation; National Forest System Lands in Alaska, 86 FR 66498 (Nov. 23 2021).

[6] USDA Announces Southeast Alaska Sustainability Strategy, Initiates Action to Work with Tribes, Partners and Communities (July 15, 2021), *available at* https://www.usda.gov/media/press-releases/2021/07/15/usda-announces-southeast-alaska-sustainability-strategy-initiates.

VII. Conclusion.

We appreciate the opportunity to both express our support for the executive order and respond to the request for information on federal old-growth and mature forests. We welcome an opportunity to speak with you more about our input and recommendations, and stand ready to support you in this rulemaking process.

Sincerely,

Austin Williams
Alaska Law and Policy Director