February 2, 2024

Ms. Linda Walker, Acting Director
Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250–1124

Via: https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356

RE: Comments on Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

Dear Ms. Walker,

Thank you for the opportunity to provide these comments on the Forest Service's Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.[1] Conserving and restoring old-growth conditions across our National Forest System is keeping with Gifford Pinchot's vision for providing "the greatest good for the greatest number."

These comments are submitted on behalf of Trout Unlimited (TU) and its more than 400 chapters and 300,000 supporters nationwide. Our members are passionate anglers and conservationists that understand and appreciate the important role our forests play in mitigating the impacts of climate change and providing clean water and abundant fish and wildlife. Trout Unlimited has long partnered with the Forest Service throughout the country to conserve and restore important watersheds and aquatic habitats, to promote water quality and water conservation, and to reduce the risks posed by climate change and catastrophic wildfire. We are especially proud of our partnership with the Forest Service and the work we have already accomplished together on our national forests, and look forward building on those successes moving forward.

Trout Unlimited supports President Biden's Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies,[2] and the administration's goal of conserving 30 percent of lands and waters by the year 2030. Conserving 30 percent of land and waters would be a significant milestone; however, science indicates this is not enough.[3] To stay below 2.7°F, another 20 percent of United States lands and waters would need to be restored so they are both resilient to climate change and can store carbon efficiently. For this reason, both protection and restoration should be central to the Forest Service's climate strategy, and therefore its old-growth strategy.

Higher water temperatures, more destructive floods, fire, and drought could eliminate 50 to 75% of our trout habitat by 2080.[4] Many of these impacts are already being felt today, where wildfires scorch the landscape at historic levels and 100-year floods now occur once a decade. There may be no more pressing issue facing America and our national forest today than climate change. Against this

[1] 88 Fed. Reg. 88,042, Dec. 20, 2023.
[2] 87 FR 24851, April 22, 2022.
[3] Dinerstein et. al. Sci. Adv. 2019.
[4] Wenger et al, *Flow Regime, Temperature, and Biotic Interactions Drive Differential Declines of Trout Species under Climate Change* at 1 (July 2011) *available at* https://www.pnas.org/content/pnas/early/2011/08/09/1103097108.full.pdf.

backdrop, we were pleased to see the Forest Service's proposed national forest plan amendment for old-growth forest. Old-growth forests are essential to promoting climate resiliency, storing carbon, providing diverse habitat for fish and wildlife, mitigating the risks of climate change, supporting sustainable economies, supplying clean water sources, and providing countless other essential services.

Conserving and restoring old-growth conditions not only makes ecological sense, but it also makes economic sense. Old-growth conditions support many of the most important social and economic benefits derived from our public lands, which include clean water, productive fish and wildlife habitat, and recreation opportunity. In order to maximize these benefits from our public lands, the Forest Service should simultaneously safeguard existing old-growth forest while also promoting the restoration of old-growth conditions more broadly on previously disturbed or altered forest lands. When making decisions about how to manage old-growth conditions and where to allocate limited resources, the Forest Service should prioritize stewardship activities that help mitigate impacts from climate change, promote resiliency, and support fish, wildlife, clean water, recreation, and the cultural and traditional values of the forest.

Trout Unlimited has long recognized the importance of old-growth forest and old-growth conditions, and consistently advocated for the conservation and restoration of old-growth forest. We commend the Forest Service for proposing this new direction to promote old-growth conditions. This nation-wide approach will help provide much-needed consistency across the national forest system while also allowing for local decision-making where appropriate that accounts for local conditions and characteristics.

I. Prevent Loss of Old-Growth *and* Restore Old-Growth Conditions.

The Adaptive Strategies for Old-Growth Forest Conservation should more explicitly aim to both: (1) prevent future loss of remaining old-growth forest; and (2) restore old-growth conditions to previously disturbed lands. As the inventory and threats assessment show, we are losing remaining old-growth forest at an alarming pace. We need to arrest this loss. Additionally, many disturbed lands can also have important characteristics that provide vital benefits and are a potential source of future old-growth forest. To be successful and meet the demands climate change is putting on our national forest system, the Forest Service must prevent or slow the loss of existing old-growth forest while also recruiting new old-growth. Wherever possible, we should promote and restore old-growth characteristics and manage our forests for fish, wildlife, clean water, recreation, and climate resiliency.

Future harvest of mature and old-growth forest should occur only where the primary purpose of the project meets climate and resiliency objectives. Trout Unlimited generally supports the proposed Standards 1-3, and encourages the Forest Service to include these standards with minor changes in the final direction. Standard 1, which provides that "vegetation management activities must not degrade or impair the composition, structure, or ecological processes in a manner that prevents the long-term persistence of old-growth forest conditions within the plan area," is especially important, but should be strengthened. As proposed, the standard could be interpreted to ignore watershed or aquatic health, and could allow vegetation management activities that cause serious short or mid-term impacts so long as old-growth persists over the long-term. Trout Unlimited suggests modifying Standard 1 to provide that "vegetation management activities must not degrade or impair the composition, structure, or ecological processes, including watershed and aquatic processes, that reduce or prevent the long-term or short-term persistence of old-growth conditions within the plan area." In a similar fashion, Standard 2 should be amended to explicitly mention watershed and aquatic health and/or processes.

Standard 4, which allows for exceptions to Standards 2 and 3 where the Alaska Regional Forester deems it necessary for the Southeast Alaska Sustainability Strategy (SASS), should be omitted and not included in the final old-growth directive. Trout Unlimited strongly supports the SASS, its goal to end large-scale old-growth logging on the Tongass, and the increased prioritization on restoration, recreation and resiliency. However, the goals and objectives of the SASS can and should be met without creating special exemptions for the Tongass to the national old-growth directive. Traditional and cultural uses of old-growth trees, as is common on the Tongass, is consistent with Standards 2-3. Similarly, micro-sales for high-value specialty products can be done in a manner consistent with Standards 2-3. Since a special exemption for the SASS is unnecessary, allowing the regional forester to create exemptions also is unnecessary, would confuse the matter, and should not be allowed. For these reasons, Standard 4 should not be included in the final direction.

Old-growth forests are essential for carbon storage and sequestration, for clean water, for fish and wildlife habitat, and for supporting biodiversity and climate resiliency. While harvesting mature and old-growth trees can generate valuable forest products, generating those products should not come at the expense of climate and resiliency objectives. In advance of any future timber sale or other project where the purpose is to remove wood products, regardless of whether the harvest is on old-growth forest, the Forest Service should critically assess the project's impact on carbon, climate resiliency, and the ability of the forest stand to help mitigate impacts from climate change. Any revenue generated from forest management or stewardship projects should be used to fund restoration efforts. Examples of old-growth harvest that TU supports may include: harvesting small numbers of old-growth trees for cultural or traditional uses, removing trees or other vegetation where wildfire suppression activities have allowed certain species to encroach beyond their natural range, to protect public health, within the wildland-urban interface to reduce the risk of catastrophic wildfire, or where necessary to meet restoration or forest health objectives.

II. Prioritize Watershed and Aquatic Health to meet Old-Growth Objectives.

The Forest Service should prioritize watershed and aquatic health as a desired condition for its proposed old-growth direction. Forest health and watershed health are inextricably linked. Healthy watersheds are more resilient to catastrophic flood and wildfire, more productive for fish and wildlife, can better support durable and reliable infrastructure and community services, and provide more reliable sources of clean water in arid regions. As proposed, the old-growth direction overlooks watershed and aquatic health and, as such, will fall short of its lofting objectives.

Focusing on watershed and aquatic restoration will help make our forests better able to withstand the threats posed by wildfire, while also helping recover the landscape after catastrophic wildfire events. Wet meadow restoration and beaver-assisted restoration are proven techniques for improving wildfire resiliency and reducing the likelihood and severity of wildfire. Increasing connectivity, such as through replacing undersized culverts, and addressing existing aquatic habitat degradation and impairments will help restore old-growth conditions while also mitigating the effects of forest management activities. The Forest Service should explicitly incorporate watershed and aquatic restoration techniques as a key part of its old-growth and wildfire strategy.

The Watershed Condition Framework and Water Source Protection programs need to be a much larger priority for the Forest Service. These programs already exist and have proven to be effective tools for improving forest health and resilience, and could be even more effective if they were given greater

priority through this new old-growth directive. Trout Unlimited has successfully completed many watershed and aquatic restoration projects in partnership with the Forest Service, has many more underway through our Keystone Agreement, and is ready to do even more.

III. Partnerships and Collaboration help the Forest Service meet its Goals.

Partnerships and collaboration—including through formal partnership agreements, shared stewardship agreements, and the like—are important tools that the Forest Service should utilize to grow capacity for meeting its old-growth objectives. These tools can help the Forest Service add new capacity through its partners to better meet the need for management activities throughout the National Forest System. The Forest Service already has the authority to utilize these formal partnerships, but should adopt policies to take further advantage of these tools. Performance measures and other metrics should incorporate partnerships to further encourage local regions and forests to better utilize partnership agreements.

To promote the partnerships and collaboration in service of the proposed old-growth directive, the Forest Service should target Legacy Roads and Trails and Great American Outdoors Act funds toward projects tied to watershed and aquatic health, and increase the transparency with which it administers these programs. Trout Unlimited is a staunch advocate for both programs, and both programs have been important and effective tools for managing the confluence between resiliency, watershed health, and infrastructure. But, more can be done. Consistent with Congressional intent, the Forest Service should more directly prioritize Legacy Roads and Trails funding toward projects that improve water quality and fish passage over projects that simply address road or trail maintenance needs. Similarly, Great American Outdoors Act funding should prioritize projects with multiple benefits that include resiliency, clean water and watershed health.

Trout Unlimited supports the Forest Service's emphasis on consulting with Tribes, which are the official voice of their citizens. However, we caution against placing the voice of Alaska Native Corporations above that of Tribes, and under no circumstance should the voice of an Alaska Native Corporation take the place of that of an affected Tribe.

IV. Conclusion.

Promoting climate resiliency, conserving old-growth forest, and restoring old-growth characteristics should be top priorities across the National Forest System, incorporated into every forest plan, and a primary driver behind the broad spectrum of land management activities undertaken across the National Forest System. While TU enthusiastically supports the proposed old-growth directive, the directive can be improved through the above recommendations. We appreciate the opportunity to provide these comments and look forward to working with the Forest Service to help make this effort a success.

Sincerely,

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