



Director, Ecosystem Management Coordination
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<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

COMMENTS: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) LAND MANAGEMENT PLAN DIRECTION FOR OLD-GROWTH FOREST CONDITIONS ACROSS THE NATIONAL FOREST SYSTEM

24 July 2024

Dear Director:

The National Wild Turkey Federation (NWTF) represents over 250,000 member conservationists across the United States. We have a 40-year partnership with the United States Department of Agriculture Forest Service (USFS) and have worked in partnership with the Natural Resources Conservation Service (NRCS) for over 25 years. Additionally, the NWTF has worked collaboratively with several Department of the Interior (DOI) agencies, including the Bureau of Land Management and the U.S. Fish and Wildlife Service (FWS), on many habitat projects across the country. We respectfully provide these comments regarding the USDA's efforts to provide **LAND MANAGEMENT PLAN DIRECTION FOR OLD-GROWTH FOREST CONDITIONS ACROSS THE NATIONAL FOREST SYSTEM.**

General Comments: (Narrative)

There is a lot of public interest in old growth forests, for many good reasons. The NWTF recognizes the importance of old growth forests on the landscape, including their role in providing wildlife habitat, diversity, connectivity, ecosystem services, and other values. The goals of this plan are to improve the retention and recruitment of old-growth forests; improve their resilience to disturbance; and strengthen their ability to adapt to future conditions. Public land forest management should demonstrate the best forestry practices and have the flexibility to use a variety of tools to manage forests adaptively, given changing local land-use patterns, fire risk, needed post-fire restoration work, etc.

The NWTF is a wildlife conservation organization focused on healthy habitats as part of our mission delivery. We recognize the importance of all forest seral stages, as all seral stages provide wildlife habitat, water, carbon storage/sequestration and recreational values. We believe healthy, resilient forests include a diversity of native tree species, age classes and structure, and that the USFS and DOI should manage forests to ensure these characteristics persist.

We appreciate that the modified, proposed action creates consistency by providing management direction for the stewardship of old-growth forests, making them resilient over time, without mandating a single management prescription or definition that applies to all forest types across the National Forest System. We also appreciate the definition recognizes the importance of old growth with respect to ecological values and old-growth-associated species. We hope plan amendments also recognize that many old-growth-associated species may have complex habitat requirements that cannot be fully accommodated for in old growth, such as the example of Northern Spotted Owls that nest in old growth and forage in early mature stands that are younger and more open, requiring at least 40% canopy closure.

As you move toward the goals to enhance old growth forests, we encourage the USFS to simultaneously work toward other forest goals that have not yet been achieved (e.g., early seral in many forests). Active management is often necessary to achieve healthy habitats, especially given expanding human populations, new land-use patterns and changing climate. It is critical to consider that many wildlife species are dependent on early seral stage forests and early successional stages that require disturbance. It is important to note that disturbance and early seral stage forests do not equate to forest fragmentation.

The USFS/DOI threat analysis found that in the Western United States, the primary threats to mature and old-growth forests are wildfire, exacerbated by climate change and fire exclusion. Insects and disease in the West are secondary threats. Eastern and Alaskan forests face a more diverse array of threats. Across the US, active management was identified as a minor threat, supporting the agencies' abilities to actively manage forests simultaneously for old growth and other values.

Appropriately managing old growth is a challenging and complex exercise for many reasons and requires balancing representation of all forest seral stages values. Developing one framework for the wide variety of forest types, geographies, topographies, and management regimes could have unintended consequences. Defining old growth at a forest or regional level, including local variables and existing data and ecological frameworks — Forest Inventory and Analysis (FIA), Natural Range of Variability (NRV), Historical Range of Variation (HRV) — is an approach with a higher probability of success.

The definition of old growth has changed over time and as new science became available. With the increased risk and presence of wildfire, climate change, and beetle infestations, the definition of old growth may need to change in the future. Old growth is best defined as a component within a healthy forest rather than a forest type. We encourage the USFS and DOI to consider current and future opportunities to create a more durable definition for old growth forest resiliency.

The NWTF appreciates this opportunity to provide comments and has focused on the Preferred Alternative (Alternative 2)¹. We recognize that the agencies worked diligently to find a realistic and moderate approach to old growth with the preferred alternative over the more restrictive and less restrictive alternatives.

Specific Comments: (Table)

DEIS Page	Specific Concern	Recommended Solution
Appendix C p. C – 4	We noticed that there are 129 forest plans, and a small number are currently adequate or are exempt from the amendment, e.g., grasslands. One hundred and four (104) forest plans will need to be amended and will see some significant management changes.	Amending the forest plans should be implemented in an administratively efficient manner. There is the potential for plan amendments to stall existing critical work or take attention away from on-going critical work without an efficient process. Clear timelines need to be established to avoid stalling this important, on-going work.
DEIS- Section 1.11.1 Page 10	There are multiple plan revisions and amendments to other land management plans such as the Northwest Forest plan. How will this DEIS affect future and ongoing management plans?	The Northwest Forest Plan spans Regions 5 and 6 and includes 17 National Forests. The existing plan includes old growth land designations and limits implementation by land designation.

¹Alternative 2: This alternative prohibits proactive stewardship in old-growth forests for the purpose of timber production (NOGA-FW-STD-03 as described for this alternative). This standard, along with NOGA-FW-STD-02a, ensures that the sole purpose of proactive stewardship will be to promote the composition, structure, pattern, or ecological processes necessary for old-growth forests to be resilient and adaptable to stressors and likely future environments. This alternative, within the scope and scale of the amendment, is intended to further land management plans toward ecological integrity for old-growth forests and is anticipated to have a net-positive effect on the extent of old-growth forests and upon associated species, habitats, and ecosystem services. Given the combination of NOGA-FW[1]STD-03 and the preservation of all management tools that could help implement proactive stewardship activities, including commercial timber harvest, Alternative 2 is anticipated to lead to the achievement of desired conditions at the fastest rate.

<p>DEIS – Section 2.2.2.</p>	<p>The USFS did not extend the Amendment to Include Mature Forest, recognizing that not all mature forest can or should be managed for future old growth.</p>	<p>The NWTF supports this decision. Lumping mature forests and old growth into the same definition limits management options when our forests are already facing a variety of challenges. Many mature forests do not necessarily exhibit old growth characteristics. Dense, mature forests may not have the potential to display old growth characteristics.</p> <p>Mature forests can be adaptively managed for forest products, to the benefit of local communities, wildlife habitat, to store carbon and perform some functions of old growth.</p>
<p>DEIS – Desired Condition 1 (NOGA-FW-DC-01)</p>	<p>This desired condition appears to prioritize old-growth as more important than other age classes and structural stages without recognition that old-growth is also represented by a percentage on the landscape.</p>	<p>Add language under Intent that explains there is a maximum threshold of representativeness for every forest type. The goal is not to have 100% old-growth. Science shows that monocultures of any forest type are detrimental to the resiliency of the forest.</p>
<p>DEIS – Desired Condition 2 (NOGA-FW-DC-02)</p>	<p>Old-growth forests persist in areas that have the inherent capability to sustain old-growth forests over time.</p>	<p>Add language under Intent that encourages persistence in areas of limited management, e.g., wilderness, roadless, riparian reserves, Endangered Species Act (ESA) critical habitat, National Parks and Preserves, etc.</p>
<p>DEIS – Standard 2.a (NOGA-FW-STD-02a)</p>	<p>When the definitions and associated criteria of old-growth forest are met, vegetation management may only be for the purpose of proactive stewardship. “Vegetation management” includes prescribed fire, timber harvest, and other mechanical/non-mechanical treatments used to achieve specific silviculture or other management objectives, such as hazardous fuel reduction, wildlife habitat</p>	<p>Recognizing that the greatest threat to old growth forest in the West is wildfire, exacerbated by climate and fire suppression, it is unclear if vegetation management with the purpose of reducing the risk of severe wildfire would be allowed as a tool to protect old growth within the wording of the standard.</p>

	improvement. “Proactive stewardship” refers to vegetation management that promotes the quality, composition, structure, pattern, or ecological processes necessary for old-growth forests to be resilient and adaptable to stressors and future environments.	The clarifying language in the last bullet point in the table is necessary and helpful (see comment on DEIS p. 103).
DEIS – Standard 2.c (NOGA-FW-STD-02c)	Deviation from Standard 2.a and 2.b to achieve wildfire risk management objectives within municipal watersheds or the wildland-urban interface (WUI), to protect public health and safety, for valid existing mineral and energy rights, and a few other exceptions, etc.	<p>The NWTF appreciates these deviations. As stated, best available science that the standard is not beneficial to a particular species or forest ecosystem is also a deviation.</p> <p>We would like to see some language in Forest Plans regarding the threat analysis and the desired conditions that might alleviate those threats.</p>
DEIS – Standard 3 (NOGA-FW-STD-03)	Proactive stewardship in old-growth forests shall not be for the purpose of timber production	The NWTF appreciates the recognition of timber removal as a forest management tool. We understand that timber production is a distinct use that will not be available in old growth stands.
DEIS – Guideline 1 (NOGA-FW-GDL-01)	In areas that have been identified in the Adaptive Strategy for Old-Growth Forest Conservation as compatible with and prioritized for the development of future old-growth forest, vegetation management projects should be for the purpose of developing those conditions.	<p>This guideline is consistent with the goals of the plan.</p> <p>NWTF recognizes that late successional reserves, wilderness, roadless, remote landscapes, provide old growth protections and should be included in the old-growth targets. Considering how much old growth is currently protected by existing designations and conditions and evaluating the target for old growth on the landscape is critical for stand diversity, wildlife habitat, ecosystem services, etc. (Examples have suggested a balance with an old</p>

		<p>growth component of approximately 15%.)</p> <p>It is crucial to manage mature forests from a healthy forest perspective. We must consider the impacts of a warmer, drier climate, and current stand conditions, resulting from over 100 years of fire suppression and a lack of active management. The presence of old trees within a stand does not intrinsically create old growth forest values.</p>
DEIS – Plan Monitoring 2 (NOGA-FW-PM-02)	Biennial monitoring evaluation report.	Monitoring should include an analysis of how/if management action or inaction have changed the susceptibility of old growth to identified threats.
DEIS – Desired Condition 1 (NOGA-FW-DC-01)	Old-growth forests occur in amounts and levels of representativeness, redundancy, and connectivity such that conditions are resilient and adaptable to stressors and future environments.	Existing data and ecological frameworks including the Natural Range of Variability (NRV), Historical Range of Variation (HRV), should be used to help guide future management direction.
DEIS – Objective 2 (NOGA-FW-OBJ-02)	Within one year of completing the Adaptive Strategy for Old Growth Forest Conservation Strategy, integrate priorities identified in the Strategy into the unit’s out-year program of work and initiate at least three proactive stewardship projects/activities to contribute to the achievement of old-growth forest desired conditions.	This seems prescriptive and could affect other Forest priorities and other priority projects/activities.
		We support looking at old growth amendment work and prioritizing it alongside (instead of above) other Forest activities that might be tribal, local, regional, social priorities.
DEIS – p. 57 “Defining Old growth”	The regional old-growth criteria employ structural characteristics that capture abundance of large trees, minimum stand age or tree age, and some definitions include standing snags or downed wood. Regions recognize unique old-growth criteria for different vegetation types.	Species composition is not identified in Pelz et al, as an old growth characteristic. Yet, many mature forests have an altered species composition due to fire exclusion, etc. It is important to identify the species present within the ecological framework.

DEIS – p. 60	The DEIS recognizes that the inventories disagree about how much old growth is currently on the landscape.	<p>This variability is problematic with respect to acknowledging the best available science. More problematic is the ability of the regions and Forests to target a % of old growth, based on historical amounts of old growth present on the landscape, with the exclusion of indigenous practices and fire.</p> <p>We suggest using these inventories as a starting point but recognizing that field verification is needed to accurately measure old growth on the landscape.</p>
DEIS – p. 67	About 50% of old growth is likely to occur in fire and/or climate refugia.	<p>Focus on and management of these refugia may be necessary to ensure that they remain resilient to disturbances like severe fire and insects.</p> <p>We encourage the USFS and DOI to consider disturbance history and allow flexibility to manage around environmental changes. For example, 50% of old growth that occurs in fire/climate refugia is managed under the Northwest Forest Plan. Since the original Northwest Forest Plan was adopted, management has decreased while fire severity has increased. Plans need to evolve as climate changes.</p>
DEIS – p. 71	In fire-disturbed old-growth forests about half experience severe fire, resulting in a decrease in old growth, while forests with low intensity fire experienced net gains.	Continual assessment of severe fire risk and appropriate management will be necessary into the future, especially as fire conditions expand from the West into the Eastern US.
DEIS – p. 74	Prescribed fire and cultural burning can reintroduce fire as a natural modifier of vegetation that can help reduce	It is important to acknowledge that in many places throughout the US, stands are not currently in a condition that would allow fire as a first entry.

	vulnerability in fire-dependent old-growth-like characteristics.	Other types of treatments will need to be implemented first to reduce fuel before prescribed or cultural burning can take place.
DEIS – p. 81	Nationally, based on Forest Inventory and Analysis (FIA) data, the national average of old growth in WUI is 25 percent, while in many western regions the percentage of old growth in WUI is around 40 percent. Managing old growth in WUI may not align with ecological integrity.	We encourage the agencies to look at and focus on areas where existing land designations currently promote old growth, e.g., roadless, wilderness, wilderness study, etc. Maintaining viable management tools for old growth forests occurring in the WUI will be critical for risk reduction to infrastructure and human lives.
DEIS – p. 103	Defines timber production as used in the preferred alternative ¹ .	This adds clarity to the preferred alternative. Move to a more prominent position within the document.

Thank you again for this opportunity to provide comments on this important rule. We commend you on this adaptive approach to managing these forests for future generations. As you move forward with plan amendments, we encourage you to also consider the importance of private lands in providing old growth values across the landscape, particularly in the Eastern US and part of the US with less public land. Private landowners play a critical role in sustaining old growth forest conditions on the landscape and their management decisions can be pivotal to protecting old growth forests on public lands in some areas.

The NWTF is committed to our partnership and to working with you to provide the best outcomes for wildlife and their habitats. We appreciate the commitment of the USDA Forest Service in implementing this amendment with other forest values and priorities. For questions or additional information, please contact: Tom Spezze, NWTF National Director of Conservation Programs; email tspezze@nwtf.net.



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