



September 16, 2024

Ms. Linda Walker, Director  
Ecosystem Management Coordination  
United States Forest Service  
201 14th Street SW, Mailstop 1108  
Washington, DC. 20250-1124

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

Dear Ms. Walker:

American Forests welcomes the opportunity to comment on USDA Forest Service's draft environmental impact statement (DEIS) for the Amendment to Land Management Plans to Address Old-growth Forests Across the National Forest System (NFS). By simultaneously amending 122 land management plans, the Forest Service national old growth amendment (NOGA) offers a consistent yet adaptable management framework to conserve and steward old-growth forests.

Since 1875, American Forests has been a champion for forests. Guided by nearly 150 years of experience, American Forests is committed to advancing public-private partnerships to promote climate-smart, place-based forest management to bring the full suite of forest benefits to all people.

The NOGA is a novel, forward-thinking proposal designed to foster the long-term resilience of old-growth forests and their unique ecological and cultural contributions. American Forests recognizes the tremendous amount of work that our agency partners put into this effort and greatly appreciates their continued commitment to engaging with the public, NGOs, states, and Tribes around this important issue.

American Forests offers the following comments in support of the DEIS and Alternative 2 – Modified Proposed Action. Alternative 2 incorporates feedback from diverse perspectives and strikes the proper balance in promoting a place-based approach to stewarding old-growth forests in the face of rapidly changing conditions and threats from high severity wildfires across the NFS.

## Indigenous Knowledge and Tribal Co-Stewardship

First and foremost, American Forests commends the Forest Service for clearly articulating Indigenous Knowledge (IK) as a source of best available scientific information and establishing a clear role for IK and Tribal leadership in the proactive stewardship of old-growth forests.

In alignment with and building upon guidance from the White House Council on Environmental Quality and the Office of Science and Technology Policy, the DEIS calls for incorporation of IK into all aspects and phases of planning, project design, and implementation.<sup>1</sup> All “action alternatives” are designed to increase opportunities for meaningful and sustained Tribal collaboration and aim to foster Tribal co-stewardship.

American Forests strongly supports this approach and believes that Alternative 2 can bring us closer to “a future in which best-available IK and Western Science guide sustainable adaptive forest stewardship.”<sup>2</sup>

To effectively implement this paradigm shift, increased investments across programs that support Tribal lands as well as increased capacity in the Forest Service Office of Tribal Relations are also needed.

## Place-based management and proactive stewardship

Forest managers need flexible, science-based approaches to accommodate diverse management contexts, forest and local site conditions, and other management considerations. American Forests appreciates that the DEIS does not prescribe one-size-fits-all management across old-growth stands and that none of the alternatives create a new designation for old growth. Instead, the geographically-informed and nimble approach posed by the Forest Service under Alternative 2 maintains a diverse suite of tools to safeguard and monitor old growth conditions.

By promoting proactive stewardship, the Forest Service is emphasizing the need for more deliberate decision making about the future of the NFS. Proactive stewardship represents an array of available actions—including no action—with the focus on creating and

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<sup>1</sup> [\*Guidance for Federal Departments and Agencies on Indigenous Knowledge \(November 2022\)\*](#).

<sup>2</sup> [\*Eisenberg, et. al, “Braiding Indigenous and Western Knowledge for Climate-Adapted Forests: An Ecocultural State of Science Report” \(March 2024\)\*](#).

implementing ecologically-appropriate management plans that anticipate future threats and opportunities.

American Forests also appreciates that the DEIS clearly articulates that the goal is not for all forests across the NFS to become old-growth forests. The DEIS respects the value of age class diversity and the unique benefits that all stages of forests offer. No forest type is objectively better than another. Each offers diverse benefits and opportunities for people and wildlife. Improving the overall health and resilience of NFS lands must be the guiding focus moving forward.

### **Addressing Threats**

The Forest Service’s Mature and Old Growth Threat Analysis documents that wildfire, exacerbated by climate change and fire exclusion, is the leading threat to mature and old-growth forests, followed by insects and disease. The analysis further documents that tree harvest and active management since 2000 has rarely resulted in conversion to other forest conditions, representing just .03% of all inventoried acres of old-growth forests.

The DEIS recognizes that proactive stewardship is critical to maintaining and improving old-growth forest stands and that current actions are not responsive enough to rapidly changing conditions and growing threats. Alternative 2 best complements the agency’s 10-year Wildfire Crisis Strategy, recommendations from the Wildland Fire Mitigation and Management Commission Report, and American Forests’ Wildfire Policy Agenda.<sup>3</sup>

By allowing commercial timber harvesting when it meets the definition and outcomes of proactive stewardship, Alternative 2 maintains much-needed flexibility to adapt to site-specific needs and continues the important restoration work achieved through Good Neighbor Authority and stewardship contracts.

Although not appropriate everywhere, commercial timber harvests are an important tool for forest managers. Removing commercial timber harvest as an available tool (as prescribed in Alternative 3) could impact the ability to pay for crews and implement other management activities. For example, in some areas and under certain conditions, prescribed fire may not be safe or effective without the ability to thin and remove larger vegetation. Furthermore, recent research demonstrates that limited inclusion of

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<sup>3</sup> [American Forests, “Restoring America’s Forests for Wildfire Resilience in a Changing Climate” \(2024\).](#)

commercial sawtimber in treatment design can have a meaningful impact on the economic feasibility of fuels treatments across the Western United States.<sup>4</sup>

With an escalating risk of severe fire exposure over the next century in old-growth forests, blanketly eliminating management tools does not further progress toward intended outcomes on the ground. Alternative 2 respects and preserves place-based management and allows for forest conditions and local needs to drive management decisions.

### **Monitoring and Data Needs**

As emphasized in previous comments from American Forests, numerous Forest Service policies emphasize the importance of monitoring and adaptive management as the basis to justify planning and operational changes. In that context, additional investment and policy refinements are clearly needed to advance more effective, consistent, and transparent approaches to monitoring, including use of partnerships and multiparty approaches where appropriate, to support current and forecasted monitoring needs.

To support the important goal of conserving and recruiting old-growth forests, additional resources are needed. American Forests supports increasing the capacity of the Ecosystem Management Coordination program and staff, specifically through the Land Management Planning, Assessment, and Monitoring budget line item.

Furthermore, the final EIS should explicitly include third parties such as Tribes, NGOs, states, and other willing partners who are in the position to leverage their capacity to assist the Forest Service in its monitoring obligations.

### **Recruitment of Old Growth**

The NOGA and DEIS focus on the conservation, restoration, and recruitment of old-growth forests. Although mature forests are excluded from the NOGA, to provide sufficient old growth necessary for landscape ecological integrity, the NFS must effectively manage some mature forests to become old growth in the future. Under Alternative 2, specific direction is provided to identify priority areas for the recruitment of future old-growth forests—including from mature forests—as part of the *Adaptive Strategy for Old-Growth*

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<sup>4</sup> [Resources for the Future, “The Economics of Forest Fuel Removals on Federal Lands” \(June 2023\).](#)

*Forest Conservation* (Management Approach 1.b) and in a guideline that applies to management of those areas (Guideline 1).

We appreciate that these strategies will be rooted in local, geographically relevant information and the best available science, including Indigenous Knowledge. However, we encourage the Forest Service to develop additional guidance to help NFS units understand and plan for the recruitment of old growth. Given the two-year deadline for development and extensive consultation with Tribes and interested stakeholders, more detailed guidance may also aid the Adaptive Strategies process and set units up for success by anticipating common obstacles and opportunities.

Once again, American Forests commends the thoughtful and collaborative approach taken by the Forest Service in developing and adapting the DEIS and Alternative 2. American Forests is committed to advancing science-drive, climate-smart forestry and looks forward to continued and expanded collaboration opportunities with the Forest Service, partner organizations, and Tribes.