

September 20, 2024

**Director, Ecosystem Management Coordination
201 14th Street SW,
Mailstop 1108
Washington, DC 20250-1124**

*Comments submitted electronically at
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>*

Dear Ecosystem Management Coordination Team:

The following comments are submitted on behalf of the [Sustainable Forestry Initiative®](#) (SFI), in response to the USDA Forest Service's Draft Environmental Impact Statement (DEIS) on Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System.

SFI is an independent, nonprofit organization that works collaboratively with our network to leverage SFI-certified forests and products as powerful tools to help solve sustainability challenges such as climate action, conservation of biodiversity, species recovery, protection of water, and education of future generations.

As SFI has noted in previous comments to the agency, the issue of old-growth and mature forests is a critical one that is inextricably linked to an overall consideration of forest health and resilience. The topic is addressed in both the SFI Forest Management Standard and the SFI Fiber Sourcing Standard. With SFI-certified forests representing close to 70 million acres in the U.S., including many with adjacency to National Forests, and with several companies certified to the SFI Fiber Sourcing Standard procuring fiber from National Forests, SFI has a significant stake in ensuring national forests are managed for health and resiliency, today and into the future.

As the DEIS notes in the introduction, in follow up to Section 2(c)(ii) of Executive Order 14072, the Forest Service proposes "to amend Land Management Plans throughout the National Forest System to develop a consistent management framework for conserving, stewarding, recruiting and monitoring old-growth forests. The intent of this amendment is to foster the long-term resilience of old-growth forests and their contributions to ecological integrity across the National Forest System."

SFI is not taking a position on the preferred option or the alternatives. However, we are providing the following comments for consideration with whatever action is taken.

First, we appreciate that the proposed amendment recognizes that "there is no single management prescription or definition that applies to all of the forest types across the National Forest System. Old-growth characteristics differ by ecosystem and species. Similarly, threats to old-growth forests differ in different regions and geographies." We agree that there should not be a single national old-growth definition and that forest managers should rely on local or regional considerations.

Second, we urge the agency to keep in mind the results of its own threat analysis, which identified that the main risks to old growth are mortality from wildfire, followed by insects and disease. Harvesting of timber products was not identified as a threat. The agency should avoid prescriptions that would reduce management actions when those actions are needed to address the primary threats to old growth.

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Third, we urge the agency to keep its climate change and wildfire strategies top of mind, and to approach its old-growth forest strategy within that larger and critical context. There is a critical need to manage forests for health and resiliency to climate change and wildfire. There is a significant risk that managing for old-growth could subjugate these more critical goals.

Fourth, we applaud efforts to develop national spatial information tools that can improve access to and implementation of data relevant to major themes in forest management such as biodiversity, water quantity and quality, carbon, fire risk and resiliency, etc. Access to authoritative, current spatial data in a decision support tool format, such as that developed by the Climate Risk Viewer, can support more efficient forest planning, participatory mapping processes, co-benefits analysis, and consensus building. We encourage that the geographic scope of datasets deployed in such tools include national-scale datasets, as private forest managers and stewards face similar threats to their forests, many of which are adjacent to USFS jurisdictions. Private forest owners also require reduced barriers in access to management relevant information on such key topics.

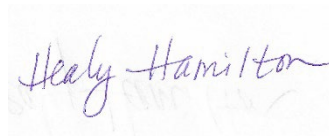
Finally, we encourage the agency to consider the dynamic aspect of old-growth and plan for flexibility in the strategy. Because old growth is a successional stage, a dynamic approach is needed. Forest managers should focus on desired conditions that will evolve over time, using science-based management practices to foster and maintain desired forest conditions across the landscape. Active management, including responsible timber harvesting, can make important contributions to climate and fire resilience. We also strongly support the emphasis on incorporation of traditional ecological knowledge, which furthers an adaptive management model and considers local ecological conditions and social concerns.

In conclusion, SFI would like to state its appreciation to the agency for the thoughtful and thorough approach it has taken to examining this important issue, and for inviting input at multiple stages both through comment period and listening sessions.

Regards,



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Healy Hamilton, Ph.D.
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