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Comments: August 24, 2022 Jamie Barbour Assistant Director, Ecosystem Management Coordination USDA

Forest Service Comments submitted electronically at

<https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239> Dear Mr. Barbour, The following comments are

submitted on behalf of the Sustainable Forestry Initiative (SFI), in response to the USDA Forest Service and

DOI Bureau of Land Management July 15 Request for Information (RFI) on federal old-growth and mature

forests. This RFI is associated with section 2(b) of Executive Order 14072, requiring the agencies to

define, identify, and complete an inventory of old-growth and mature forests on Federal lands, accounting

for regional and ecological variations, as appropriate, and make such inventory publicly available. SFI

advances sustainability through forest-focused collaboration. We are 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. Our comments are structured to provide general considerations as

well as responses to the five questions outlined in the RFI. General considerations As the agencies develop a

definition framework, SFI encourages the agencies to rely on existing efforts and definitions by federal agencies,

state agencies, and standard-setting organizations such as SFI. The Forest Service has invested considerable

time and effort over the past several decades to define old-growth forests, resulting in a series of definitions for

different forest types, from Southern mixed hardwood forests to Southwestern subtropical upland forests (see

also a 1994 USFS publication). These definitions were developed with input from forest managers, scientists,

and the public and should be relied on in the current effort to develop a definition framework. It is clear from this

past work that a single definition applied universally would be detrimental and would ignore science and local

considerations. Numerous published studies suggest that old-growth forests need to be defined within a forest

type, based on scientific expertise and experience. The SFI 2022 Standards include a definition of old-growth

forests as "A forested ecosystem distinguished by old trees and related structural attributes such as tree

size, down woody debris, canopy levels, and species composition. Certified Organizations should utilize a

definition specific to their region and particular forest types." In recognition of the importance of protecting

old-growth forests, the SFI 2022 Forest Management Standard includes requirements to recognize and protect

old-growth forests, along with other approaches that ensure diversity at the landscape scale. Specifically, the SFI

Standard directly addresses old-growth by requiring certified organizations to:

- Prohibit conversion of forest

- cover types that create a significant adverse impact to old-growth forests. (Indicator 1.2.1)

- Protect Forests with Exceptional Conservation Value and old-growth forests. (Performance Measure 4.2)

- Support and participate in programs for the conservation of old-growth forests in the region of ownership or forest tenure.

- (Indicator 4.2.3) The SFI standard also indirectly addresses old-growth by requiring certified organizations to:

- Incorporate the conservation of biological diversity, including native species, wildlife habitats and ecological

- community types at stand and landscape levels, through the use of best scientific information including the

- incorporation of research results. (Indicator 4.1.1)

- Support the diversity of native forest cover types and age or size classes that enhance biological diversity, by incorporating the results of analysis of documented diversity

- at landscape and ownership/tenure levels. (Indicator 4.1.3)

- Protect ecologically important sites in a manner that takes into account their unique qualities. (Performance Measure 4.3)

- Manage lands that are geologically or culturally important in a manner that takes into account their unique qualities (Objective 6).

- Recognize and respect Indigenous Peoples' rights and traditional knowledge (Objective 8)

Certified Organizations incorporation of traditional knowledge supports a full regional and ecosystem context and maintains the

commitment of Objective 8 within the SFI standards

Responses to RFI Questions

1. What criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for

planning and adaptive management? The Oregon Society of American Foresters position statement on Managing

Mature and Old-Growth Forests states: "Research and management experience show that professionally

prescribed, site-specific plans are most effective in achieving and maintaining desirable forest conditions. These

plans should carefully consider local ecological conditions and objectives, social concerns and policy constraints of the owners or managers. As the USFS and BLM explore how to define, identify, and inventory old-growth and mature forests on Federal lands, it is critical to consider this work in the context of the shared goal of creating healthy, resilient forests. A healthy forest includes a range of forest ages, balanced across young, mid, and older forest types. Each seral stage provides habitat for a range of complimentary species assemblages, and each serves a valuable function in a healthy ecosystem. Today's old-growth forests developed from disturbances and under past climate conditions and thus their structure and composition offer a window into the past and not a path for the future. Forest managers should focus on desired conditions that will evolve over time, using management practices to create and maintain these systems across the landscape. Gaining perspective through incorporation of traditional ecological knowledge furthers an adaptive management model and considers local ecological conditions and social concern. This Administration has advanced numerous policies and strategies over the past 18 months designed to address our growing wildfire risks and the need to mitigate climate change. One notable example is Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies, which outlines several policy goals, including to:

- invest in forest health and restoration
- deploy climate-smart forestry practices and other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities
- support collaborative, locally led conservation solutions

Management of mature and old-growth forests needs to be considered in the context of these valuable wildfire and climate goals or the agencies run the risk of counteracting them. The growing risks of catastrophic wildfire and climate change suggest the need for continued management to protect our landscapes. It is critical to consider that old-growth is a stage, not a fixed point in time. Old-growth forests will experience decay and mortality, which in turn will lead to release of carbon and increased risk for wildfire. In many cases, management is needed to restore or maintain ecological functions of mature forests.

2. What are the overarching old-growth and mature forest characteristics that belong in a definition framework? As with many sustainability considerations, it is critical for forest managers to consider the geographic and ecological context in which they operate when determining how to define and manage old-growth forests. During the August 4 listening session, the Forest Service suggested that a possible criterion for the definition of mature and old-growth forests is "recognizes ecological variation to promote resilience". This is a critical consideration and suggests that a single universal definition that is overly narrow will be incompatible with considerations of ecological variation. A national framework for old-growth forests should be regionally and ecologically derived, and include the following elements in the creation of a real-world and applicable definition for old-growth forests in the United States:

- Regional climate considerations, including growing season length, and precipitation regimes
- Regional forest dynamics, including disturbance types and patterns
- Forest cover type and tree species
- Tree species distributions and community composition
- Traditional ecological knowledge from regional Indigenous communities

Taken together, these elements will define the qualities, quantities, and age distributions of trees that will be representative of old-growth forests in a given region of the US. Failing to consider any of these factors will lead to an incorrect and unusable definition that will run counter to existing policies, socio-economic considerations, and future forest desired conditions.

3. How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site productivity and geographic region? See answer to #2 above. It is critical that a definition framework consider the variation in forest type and geographic region. It is also important to consider that successional stages are cyclical. A definition framework must consider changes over time, such as what happens after an old-growth or mature stands burns.

4. How can a definition be durable but also accommodate and reflect changes in climate and forest composition? As noted in our answer to #1 above, today's old-growth forests developed from disturbances and under past climate conditions and thus their structure and composition offer a window into the past and not a path for the future. Forest managers should focus on desired conditions that will evolve over time, using management practices to create and maintain these systems across the landscape.

5. What, if any, forest characteristics should a definition exclude? It is important that the definition framework avoid prescriptions on age or size thresholds. There is tremendous variation in old-growth age and size thresholds across the United States, and the science does not support an approach that would dictate a specific age or size threshold. Because it is related to forest type, the age category which qualifies as "old-growth" will depend on the dominant tree species, forest type, region, and life-history of the surrounding trees and landscape. In conclusion, as the agencies move forward not only to define old-growth and

mature forests but also to propose management policies, it will be critical to consider the geographic and ecological context of these forests and to ensure alignment with important wildfire and climate goals. We further encourage the agencies to publish the definition of old-growth and mature forests that is developed, before initiating the inventory process. Thank you for your consideration of our comments. SFI would be pleased to discuss any of these ideas further. I can be contacted at [nadine.block@forests.org](mailto:nadine.block@forests.org) or 202-596-3456. Regards, Nadine Block Senior Vice President, Community and Government Relations