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Comments: Please see attachment.

To: Christopher French, Deputy Chief, National Forest System, U.S. Forest Service Tracy Stone-Manning, Director, Bureau of Land Management  
From: Acting State Supervisor, Oregon Fish and Wildlife Office, Portland, Oregon  
Re: Response to Request for Information, Docket No. FS-2022-0003

The Oregon Fish and Wildlife Office (OFWO), US Fish and Wildlife Service (USFWS), appreciates the opportunity to provide comments on the US Forest Service (USFS) and Bureau of Land Management's (BLM) request for information on defining, identifying and completing an inventory of old-growth and mature forests on Federal lands. Although the USFWS does not directly manage large forest ecosystems, we influence how these forest lands are managed through our various authorities, programs, and partnerships with forest land managers such as the USFS, BLM, National Park Service, State forest agencies, and private landowners. Over 17 million acres of Federal forestland occur in Oregon. Forest ecosystems vary across the state and are home to a vast array of tree, plant and wildlife species and are some of the most important forests in the world for climate change mitigation and biodiversity conservation. The status and trends of older forests on USFS and BLM managed lands have been monitored under the Northwest Forest Plan Effectiveness Monitoring Program for over 25 years within the range of the northern spotted owl across Washington, Oregon, and California. The robust, science-driven approach of the NWFP monitoring program accounts for different forest ecosystem types and disturbance regimes. The program is a national model for Federal forest assessments and should be incorporated into this effort to define, identify and complete an inventory of old-growth and mature forests on Federal lands. Incorporating this information would be an effective and time-saving approach, and would allow the Federal agencies to expedite next steps to restoring and conserving mature and old-growth forests in Oregon. For forests in eastern Oregon, we recommend the USFS and BLM continue to work with our office to further refine the tools used to define and assess older east side forests. Climate change adaptation, carbon sequestration, and maintenance or restoration of ecological function should be high priorities on our Federal forests. The conservation of older forests provides multiple benefits, including carbon storage, mitigating temperature changes, and providing diverse habitat structure for fish, wildlife, and other species. Carbon storage is greatest in moist, westside old growth but even in dry forests, older forest stands are likely to provide fire refugia in most conditions and store large amounts of carbon. In many cases, old forests are among the ecological features best equipped to maintain ecological function in the face of climate change. These old forests are not replaceable on a human timescale and should be protected. In other cases, factors such as climate change, fire suppression, or invasive species may be altering the development of mature forests, and active management will be necessary to direct change in these forests so that important ecosystem services will not be lost. The management focus should be on ecosystem conservation with appropriate monitoring of various at-risk and focal species to help inform whether management goals are being met. Restoration of ecological processes provides for proactive species conservation--when ecosystems function well, fish and wildlife thrive. The USFWS is in an important position to lead and help implement conservation on Federal forests and must be an integral part of this effort. We request that the USFS and BLM collaborate with our office throughout the process of defining, identifying and completing this inventory and on future conservation efforts.