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Comments: Statement on federal old growth and mature forests (Executive Order 14072)

The Forest Stewards Guild practices and promotes responsible forestry as a means of sustaining the integrity of forest ecosystems and the human communities dependent upon them. While our members across the country are actively managing forests for human and ecological benefit, we recognize the importance of protecting old growth forests. Old growth forests provide critical ecosystem services such as wildlife habitat, species diversity, hydrological regimes, nutrient cycles, carbon storage, and numerous other ecological processes. The unique structures and attributes of old growth forests support a wide range of species, including some that are old growth obligate. Old growth forests inspire a sense of awe, offer recreational opportunities, and hold spiritual values for many. Although mature forests do not provide the same suite of services and functions of old growth forests, they are ecologically important and a critical economic resource.

We enthusiastically welcome and support the old growth Executive Order (EO) but would like to provide several cautionary notes to nuance its implementation for the benefit of forest ecosystems and forest dependent communities. First, definitions matter and together with scientific insight and ground-based experience they must drive site appropriate management decisions. Second, forest management must focus on ecological processes and functions rather than on ecological conditions when measuring achievements toward the intent of the EO. Forest processes, such as wildfire and wind are essential, even in old growth and mature forests, for long-term forest health, regeneration, and resilience in the face of a changing climate. Lastly, in certain mature forests, active management, including active management for timber products, is desirable to prevent high intensity wildfire, optimize ecological benefits, and support forest-based economies. The following clarifies these assertions.

#### Definitions and Disturbances

"Old" and "mature" are relative rather than absolute terms as tree lifespans range from less than a century to millennia. For example, old for an aspen tree with a life span of 100 years is quite different than old for a redwood tree that might live 1,000 years. Any definitions of old growth or mature forests are context dependent. A simple, generic definition would fail to protect some unique ecosystems while trying to preserve common forest conditions that may need active management to be resilient to climate change or meet society's need for climate-friendly forest products. Blanket definitions do not capture the complexity and nuance inherent in our forests, two key ingredients in a variety of different mature and older forests nation-wide.

Disturbance regimes are an essential part of ecosystem and help determine the character of old forests, such as spacing, thick and complex branching structure, cavities, forked tops, and deep crowns. Fire is a keystone process in many forests and can define the age or structure of old forests. In some Northeastern forests, windstorms are an important, infrequent disturbance that differentially impact old or mature stands. A definition of mature or old growth forests that excludes disturbance will fail to protect the common attributes we value, including carbon storage and sequestration.

#### Old and mature forest management

An inventory of our remaining old growth forests will help identify threats, inform a policy that guides management, and safeguards their role in carbon cycling and climate resilience. Large, high-severity wildfires are a particularly grave threat to old forests across the West. The inventory and threat assessment should provide a strong basis for land managers and communities to identify priorities for forest restoration and conservation, while reducing risks of megafires through science-based ecological forest management which includes prescribed fire and managed wildfire.

Some mature forests can be the future old growth and management can help foster and even accelerate development of old forest characteristics in mature forests. Management is necessary in many mature forests to mitigate the negative impacts of climate change. Invasive plants, insects, and diseases can be deleterious to mature forest health and functioning, but careful management can help build resilience or foster recovery.

Active management for timber and other forest products can aid our carbon sequestration goals. Wood from our forests stores carbon in houses, furniture, and many other products. Wood is often a much lower carbon option than alternative construction materials such as concrete or steel. Any reduction in timber harvest on public land is likely to increase harvest on private land and in other countries where environmental controls are weaker. We should be encouraging private and public landowners and managers alike to lengthen rotational ages, not diminish them. Prohibiting forest management in mature forests would be disastrous for our climate goals and negatively impact communities near public lands that depend upon the forest products industry.

The Guild and its members are willing and able to support the agency in identifying and conserving the mature and old-growth forests on federal lands with science and on the ground experience.

Sincerely,

Alexander Evans, PhD  
Executive Director