

Old Growth & Mature Forests: Conservation vs. Preservation



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Tom Schultz, FFRC President

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Supposed Membership of **over 6 Million people** (no way of knowing how much overlap there is)

Combined budgets of over **\$400 Million Annually**

Sierra Club has **opposed commercial timber harvest** on National Forests since 1996

All are supporters of “**30 by 30**,” calling for massive new **wilderness areas** across the country

CBD and Earthjustice are **leading litigators against FS** timber sales/fuels reduction work



April 2022 Executive Order:



According to the White House it

- “Safeguards mature and old-growth forests on federal lands”
- “Strengthens reforestation partnerships across the country”
- “Combats global deforestation”
- Promotes reforestation to “reduce emissions and build resilience”

April 2022 Executive Order:

What it actually does:

- No one knows
- Forest Service doesn't have a definition, so must develop one on their own
- After seeking input on a workable national definition, FS must produce an "inventory" by April 2023.





FS and BLM “Request for Information”

July 2022

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?

What are the overarching old-growth and mature forest characteristics that belong in a definition framework?

How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site productivity and geographic region?

How can a definition be durable but also accommodate and reflect changes in climate and forest composition?

FFRC's View:

A “universal definition framework” for Old-Growth & Mature forests will **either by so broad as to be meaningless or so specific that it excludes some older forests.**

There are no “overarching old-growth and mature forest characteristics” due to the **massive variety of forest types** found across the National Forest System.

No definition can capture the “disturbance and variation in forest type/composition, climate, site productivity and geographic region” found on the National Forests

Having a definition **doesn't help us adapt forests to climate change** and other disturbances.

FFRC's View:



Mature Longleaf Stand
Kisatchie National Forest,
Louisiana



Overmature Aspen Stand
Superior National Forest,
Minnesota



Old Sitka Spruce
Tongass National Forest,
Alaska

FFRC's View:



Mature Longleaf Stand
Kisatchie National Forest



Overmature Aspen Stand
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Old Sitka Spruce
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FFRC believes identification of older forests **should be addressed during the Forest Planning process**, which allows consideration of local conditions and the already developed Regional Forest Service definitions, which **are specific to forest types in each region**.

Management – including harvest of mature trees – is vital to conserving some forest types, and for the creation of specific habitat types. Any policy must recognize this.



Resource Managers Agree



The Nature Conservancy: “a “one-size-fits-all” approach to characterizing mature and old-forests would be **counterproductive to conservation** In many forest types, to do so would **risk perpetuating the unnatural conditions** present following 150+ years of unsustainable forest management practices **and ignoring risks to existing and future mature and old forests ...**”



Society of American Foresters: “Science **does not support a universal framework definition of old-growth or mature forests** that can apply to all forest types... Due to regional variation in forest types, any prescriptive criterion at the national scale for old-growth forests would be **arbitrary and based predominantly on social values...**”



National Association of State Foresters: “Any given stand of trees **has differences compared to the stand adjacent to it...** Every forest is unique. Its species composition differs, its soils are variable, and the weather and climate vary from locale to locale. Natural disturbances, like windstorms and lightning started wildfires vary too...”



Preservationists Just Want the FS to Stop Cutting Any Tree Over 80 Years Old

“In summary, I urge the US Department of Agriculture and US Department of Interior to work together to soon initiate a rulemaking based on a definition of mature forests and trees as 80 years and older, to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging.” – Any one of about 6,500 form letters, XL spreadsheets, and other point and click comments submitted by organizations supporting the Climate Forests Campaign

“For the purpose of protecting these climate-critical trees and forests from logging, "mature" should be defined as 80 years and older.” – Another version of the same thing

“Please honor President Biden's Earth Day pledge to save our old growth forests....Please consider trees 80 years and older as qualifying as old growth forests... We, our children and future generations, healthy ecosystems and an intact planet.” – Ditto, from a commenter



Many Old Growth Forests and Species Depend on Disturbance, including Forest Management



Black Ram Project, Kootenai National Forest (Montana) – Removal of “mature” Red Fir necessary to restore historic fire regime.



Kirtland's Warbler – entirely dependent on harvest of “mature” Jack Pine on Huron Manistee National Forest, Michigan



Red Cockaded Woodpecker – entirely dependent on harvest of mature pines on NFS Units in SE US



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Distraction from the Crisis



Forest Service
U.S. DEPARTMENT OF AGRICULTURE

FS-1187a | January 2022



“A CALL FOR DECISIVE ACTION”

“It will take a paradigm shift in land management”

“The Nation faces a growing wildfire crisis... This is a national emergency...”

“Forest Service is establishing a strategy for working with partners to dramatically increase fuels and forest health treatments by up to four times current treatment levels in the West.”



Next Steps

- Forest Service will adopt a “definition” and produce a crude inventory by April 2023.
- It is not clear whether FS/BLM will seek public comments on the definition chosen to inform the inventory.
- Once inventory is completed, FS and BLM are directed to:
 - “analyze the threats to mature and old-growth forests on Federal lands, including from wildfires and climate change;
 - develop policies, with robust opportunity for public comment, to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands.”