

# Mature & Old Growth Policy and Rule Making

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# Mature & Old Growth Forests

**“Climate Forests” Campaign** driving the issue: Public launch February 2022 – 4 months after passage of Infrastructure Act (with billions for forest health, thinning, etc.):

- Led by Sierra Club, NRDC, Earthjustice, and League of Conservation Voters
- Sierra Club has **opposed all commercial timber harvest** on NFS lands since 1996
- Joined by 116 other organizations, ranging from the Great Old Broads for Wilderness to the Center for Biological Diversity



# WHO WE ARE

Our organizations have worked to protect federal forests, wildlife, watersheds, and our climate for decades. We've come together to launch the Climate Forests Campaign because conserving our remaining older forests and trees on federal public lands is one of the country's most straightforward, impactful and cost-effective climate solutions. This must be prioritized alongside rapidly reducing greenhouse gas emissions. We are calling on the Biden Administration to enact a strong, lasting rule that protects mature trees and forest stands from logging across federal lands as a cornerstone of US climate policy. The older parts of our nation's forests are climate and biodiversity champions — they sequester large amounts of carbon and can store that carbon for centuries, providing the foundation for a diversity of life. If the Administration is going to lead in solving the climate and biodiversity crises, it must protect these carbon critical climate forests and set an example for the world.

# Mature & Old Growth Forests

“Climate Forests” Campaign:

Initial demand was **to ban harvest of any tree over 80 years old** on FS/BLM land.

➤ Discredited by comments on Forest Inventory

Have now moved on to demanding that **all NFS acres that are “mature or old growth” be removed from the suitable timber base.**

➤ Not supported by comments on Advance Notice of Proposed Rulemaking (ANPR)

# Mature & Old Growth Forests: An Issue Designed to Distract

“Climate Forests” Campaign Claims Mutually Exclusive, Contradictory:

- Claim that timber harvest constitutes instantaneous carbon loss, **yet that 95 percent of the carbon on the NFS is found in the forest pool** (despite over half TRILLION board feet of harvest from NFS lands since 1940)
- Attempt to claim credit for conservation successes **created by timber harvest** as examples of “old growth” protection (Red Cockaded Woodpeckers recovering on NFS lands in the South that consistently harvest ‘mature’ trees)
- Ignores the fact **that 37 times more acres of NFS lands have burned since 2001 (the year the “Roadless Rule” was adopted)** than have experienced any timber harvest over that period.

# Challenge: Mature & Old Growth Forests

- **April 2022** Executive Order Requires Definition, Inventory by April 2023; then calls for “threat assessment” and recommended policies.
- **July 2022:** Request for Information on “Universal Definition Framework” received over 90,000 comments (95 percent point and click form letters)
- **April 2023:** Definition and Inventory released
- **Summer-Fall 2023:** Threat Assessment & “Advanced Notice of Proposed Rulemaking” on Improving ‘climate smart’ forestry on Federal lands.

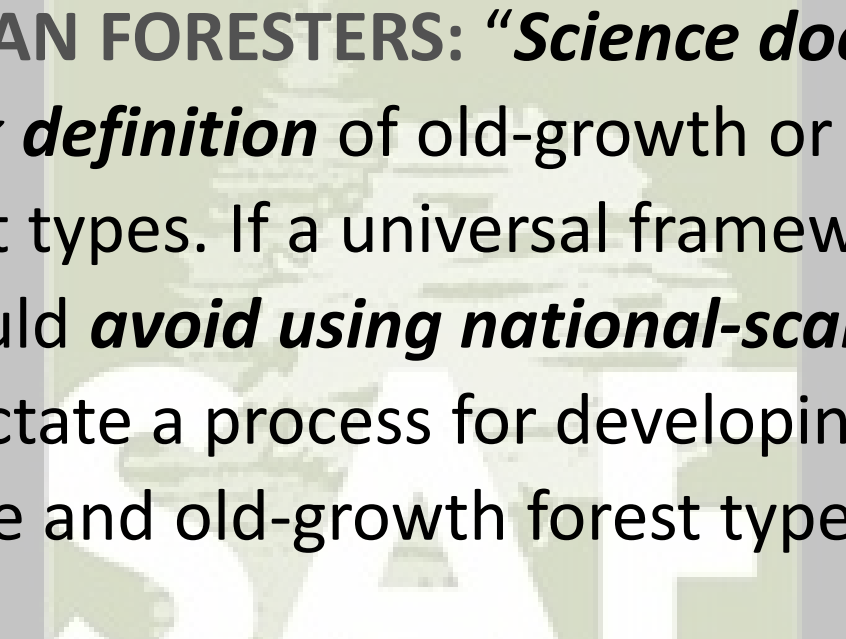


## Old Growth Definition: Management Professionals Urged Caution

**THE NATURE CONSERVANCY:** “defining old-growth and mature forests is an *immensely challenging* task given the *diversity and complexity of forest ecosystems* on Federal lands across the United States, resulting from *wide variability* in the biophysical environment, previous management, and underlying disturbance processes that shape forest development. *It is critical that this disturbance dimension of mature and old forest development be central to their definition, identification, mapping, and conservation.*”

## Old Growth Definition: Management Professionals Urged Caution

**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. If a universal framework definition must be developed, it should *avoid using national-scale prescriptive criteria* but rather dictate a process for developing ecological definitions for mature and old-growth forest types at *a regional scale.*”**

The logo of the Society of American Foresters is centered in the background. It features a stylized green tree with a white outline, set against a light green background. Below the tree, the letters 'SAF' are written in a large, white, serif font. The entire logo is enclosed in a thin grey border.



## Old Growth Definition: Management Professionals Urged Caution

**FEDERAL FOREST RESOURCE COALITION:** “We believe a universal definition, or even a “universal definition framework” ***limits the ability of the Forest Service to manage for specific species*** and will ***lead to less old-growth on the landscape over time***. Forests will mature, decay, and, in many cases, burn... Without active management, ***stands experiencing stand-replacing disturbances will not mature into “old-growth”*** stands, and with no effort to control brush after such events, they ***may not return as forests at all.***”



# Mature & Old Growth: Inventory Results April 2023

- Adopted regional definitions based on 1992 FS Definitions (as recommended by SAF, State Foresters, FFRC)
- Almost 92 Million Acres (143K sq. mi.) of NFS Lands either “mature” or “old growth” (MOG) – almost 64 percent of NFS forested acres (bigger than Idaho!)
- 39 Million Acres of MOG on NFS is already in Wilderness, Roadless, Wild & Scenic River designations (more than 42 percent of the MOG total and more than 1/4<sup>th</sup> of NFS Forested Acres).
- “Protected” MOG = 61,000 sq. mi. (bigger than HI, MA, VT, NH, NJ, CT, DE, and RI COMBINED)
- BLM adds another 20 Million Acres MOG for total of almost 113 million acres of MOG

## Old-growth and Mature Forest Initial Inventory Estimates

Old-growth and mature forests combined cover the majority of forest lands managed by the Forest Service and BLM forest lands. Between 30 and 40 percent of Forest Service and BLM forested areas are younger forest (forests not mature or old growth). Both old-growth and mature forests are distributed across land use allocations, with similar proportions in Congressionally designated areas as in other land use allocations (Table 1).

**Table 1.—National total area (acres) of mature and old-growth forest land<sup>a</sup> on Forest Service and BLM lands, shown by Congressionally designated land use allocations. “Other” category includes all remaining land use allocations.**

Agency & Land Use Allocation	Younger Forest acres	Younger Forest SE% <sup>b</sup>	Old Growth acres	Old Growth SE% <sup>b</sup>	Mature acres	Mature SE% <sup>b</sup>	Total Forest Land acres
<b>Forest Service</b>	<b>52,505,613</b>	<b>1</b>	<b>24,400,019</b>	<b>1</b>	<b>67,413,361</b>	<b>1</b>	<b>144,318,993</b>
Wilderness <sup>c</sup>	9,937,704	2	4,194,748	3	9,335,433	2	23,467,885
Inventoried Roadless Area	12,094,84	2	9,116,931	2	16,076,595	2	37,288,373
National Monument	243,552	15	88,470	26	212,917	15	544,938
Other	30,229,50	1	10,999,871	2	41,788,417	1	83,017,797
<b>BLM</b>	<b>13,212,751</b>	<b>2</b>	<b>8,258,370</b>	<b>3</b>	<b>12,698,776</b>	<b>2</b>	<b>34,169,897</b>
Wilderness	589,153	10	494,901	11	495,233	11	1,579,287
Wilderness Study Area	1,111,718	7	1,231,592	7	982,506	8	3,325,816
National Conservation Lands <sup>c</sup>	575,959	10	837,732	8	727,802	9	2,141,492
Other	10,935,92	2	5,694,145	4	10,493,235	3	27,123,302
<b>Total BLM &amp; Forest Service</b>	<b>65,718,364</b>	<b>1</b>	<b>32,658,390</b>	<b>1</b>	<b>80,112,137</b>	<b>1</b>	<b>178,488,890</b>

# Challenge: Mature & Old Growth Forests

## **Inventory Results (Released April 2023):**

- 113 Million Acres of MOG on just Forest Service and BLM Lands

That doesn't include forests on:

- National Park System, National Wildlife Refuges & DoD Lands (55 Million Acres)
- State & Local Gov't (83 Million Acres)
- Private Forests (445 Million Acres)

**Still found 14 percent of the entire US forest estate is MOG while examining only 17 percent of the total.**





# Threat Assessment & “ANPR”

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- “Threat Assessment” Ongoing – Public Involvement less than clear
- “Advanced Notice of Proposed Rulemaking” (published May 2023) garnered over 92K Comments – Most point and click postcards simply saying “protect old trees”
- FFRC submitted 45 pages of well sourced and well-cited (mostly Forest Service research) arguing that the last thing the NFS needs is a new set of “no touch” areas

# Mature & Old Growth Forests: Science shows blanket “protection” unlikely to be effective

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- **Loss of Mature Forests in California:** 50% of moderate or high-density mature forest habitat saw canopy cover decline below 40% constituting a transition to lower density forest (22% of the original extent) or non-forest vegetation (28% of the original extent). Within the mature forest classification, higher density areas experienced more extensive declines, with 85% of this subclass falling below the 60% canopy cover definition of high density.” *Steel et. al. 2022*



# Mature & Old Growth Forests: Science shows blanket “protection” unlikely to be effective

- **Loss of Mature Forests in California:** “Recent disturbance trends in western forests create a test” of the assumptions behind a static approach to habitat conservation in disturbance-prone systems. “Results from the Pacific Northwest suggest that in dynamic, disturbance-dependent forests, this assumption is not well supported...” and that “Under climate change, a static approach to mature forest conservation may be even less effective in drier and warmer regions such as the southern Sierra Nevada.” (*Steel et. al.*)





Mature & Old Growth  
Forests: Science shows  
blanket “protection” unlikely  
to be effective

- **“Protected Areas” Experiencing Large Fires:** Roadless and set aside areas “were associated with a far greater extent of fire relative to roaded areas. Between 1984 and 2018, an area equivalent to 30% of the total area of roadless lands experienced fire, whereas an area equivalent to 18% of roaded areas experienced fire.” (*J.D. Johnston et. al. 2021*)



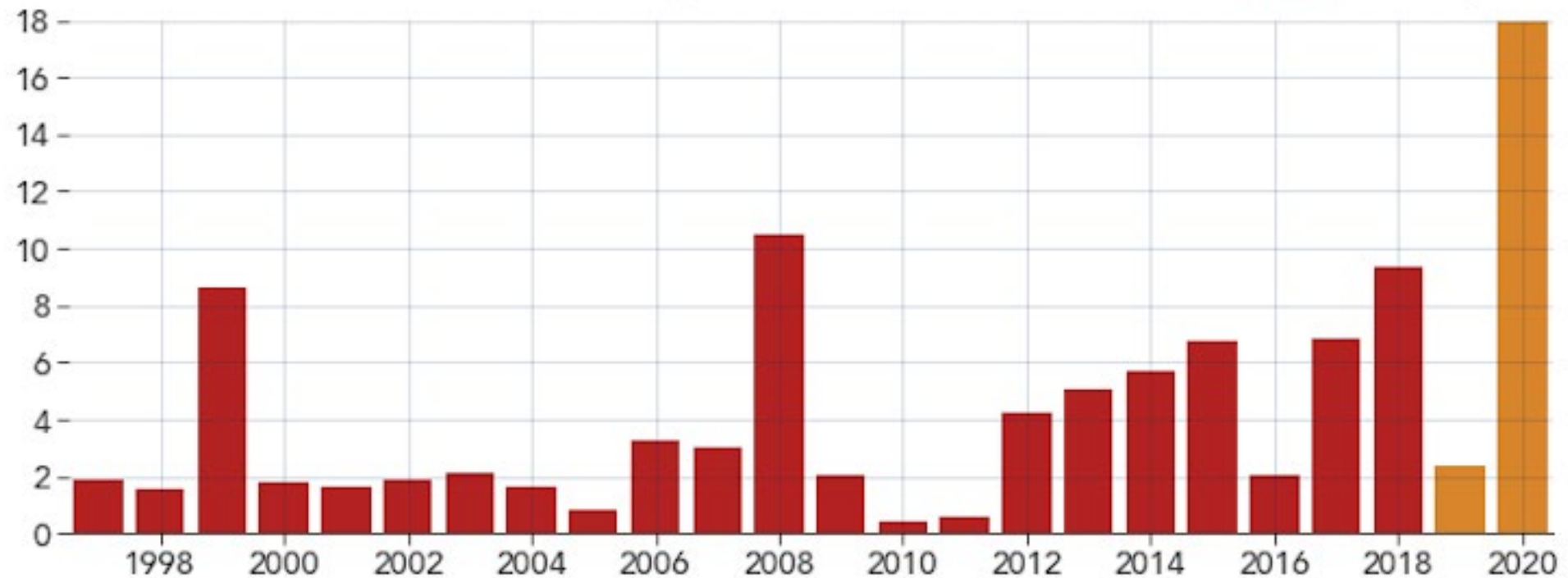
# Mature & Old Growth Forests: Science shows blanket “protection” unlikely to be effective

- **Reserve strategies proving ineffective:**  
FS Researchers thought that “reserves would provide habitat for the protected species during a lengthy recovery period,” but this has not “turned out to be true. Managing for northern spotted owls and other late-successional and old forest associated species within the context of static reserves has turned out to be incredibly challenging.”

“Many 80- year-old trees are not very large and most today are shade-tolerant and a product of fire exclusion” ... “A considerable body of science and implementation experience” warrants reconsideration of the static reserve approach, as well as the “grave risks of inaction.” (*Gaines et. al. 2022*)



Carbon Emissions from Fires in California (Tg)



Mature & Old Growth  
Forests: Science shows  
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- **Reserve strategies proving ineffective:** Malmshemer et. al. found that “Evidence of increasing losses to disturbances ... in maturing forests suggests that a strong conservation- oriented strategy may not always produce significant global climate benefits,” and that older forests “generally become carbon-cycle neutral or even carbon emission sources” and that they emit “carbon without providing the carbon benefits available through product and energy substitution.” (*Malmshemer et. al. 2011*)

## Mature & Old Growth Forests: Science shows management yields better carbon outcomes

- **Short Term Carbon Loss leads to longer term carbon sequestration and storage:** “management actions that emit carbon to the atmosphere in the short term may be able to enhance forest growth and provide greenhouse gas mitigation benefits over a longer period land that harvests lead to carbon stored in “durable wood products that can last more than 100 years.” (*Perez-Garcia et al. 2007*)



# Mature & Old Growth Forests: Science shows management yields better carbon outcomes

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- **Short Term Carbon Loss leads to longer term carbon sequestration and storage**: National Forest Foundation researchers modeled fuels treatments and likely emissions on the Cragin Watershed on the Coconino National Forest in Arizona. They found that “restoration treatments prevent the loss of forest carbon from high severity fires and help secure existing carbon in healthier, more resilient forests,” and that any short-term carbon loss from management is “temporary as the trees remaining in restored stands continue to sequester carbon.”





Mature & Old Growth Forests: Science shows management yields better habitat outcomes:

- **Management of unreserved forests creates better habitat over time:** “there is a greater likelihood of meeting more species' requirements when more varied habitat conditions are present,” and that “a forest landscape that is managed to provide all successional stages of the forest types present, using silvicultural methods appropriate to the site, provides habitat for the most species over time. Habitat conditions needed by various species are present continuously in a shifting mosaic as some stands are regenerated and others mature.” (DeGraaf et. al. 2006)

# Mature & Old Growth Forests: Preferred Outcome

**Identify Older Stands Vulnerable to  
Wildfire, Treat them Aggressively**

115-year-old Ponderosa Pine Stand,  
Prescott NF in Arizona

Thinned (including sale of sawtimber)  
2016 – Rx burned 2X since.

Would have been catastrophic fire absent  
thinning treatments



# Change our thinking:



“Protection” strategies for species (Spotted Owls, Grizzly Bears, Lynx) leading us to leave watersheds and communities vulnerable (Lassen NF – Northern Spotted Owl ‘habitat’)

FS tried to thin this watershed for 6 years – project kept getting enjoined due to litigation.

Chips Fire (2012) torched watershed, destroyed 20 Spotted Owl “Protected Activity Centers”, reburn took place 2021



# What is to be done?

- ***Every National Forest in Western U.S.*** identify and implement fuel breaks using IIIA Categorical Exclusion
- ***Use “Emergency Action” Authority*** to create fuel breaks and age class diversity on ***every National Forest*** in the Western U.S.
- Enact ***Cottonwood reform*** to clarify that Forest Plans are ***not actions requiring consultation.***
- Start ***challenging assumptions around habitat*** – dense, closed canopy forests proving themselves ***very vulnerable to climate change and landscape scale fire.***



# What is to be done?

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- FS has acknowledged that at least half the NFS is Wilderness/Roadless, mechanical fuels reduction will not take place on those acres
- Stop overselling Rx Fire as a solution unto itself. Most NFS timberlands in the West are too dense to be safely prescribed burned – mechanical fuels treatments must happen first.
- Stop counting backfires set during suppression operations as hazardous fuels *reduction accomplishments*.



# What is to be done?

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- Forest Service should aggressively thin mature stands within the Suitable Timber Base and create age class diversity across the landscape using ALL available authorities and funding pools
- Use proceeds from selling portion of merchantable timber (potential to expand treatments to an additional 8 Million acres).
- Save existing installed infrastructure by offering timber sales that meet fuels objectives.



Questions?