



Forest Carbon Coalition

Advancing nature's climate solutions

June 13th, 2022

Sent by electronic and regular mail

Tom Vilsack
Secretary of Agriculture
1400 Independence Avenue SW.
Washington, DC 20250

Chris French
Deputy Chief of National Forest Systems
1400 Independence Ave., SW
Washington, DC 20250

Deb Haaland
Secretary of Interior
849 C Street NW
Washington, DC 20240

Alexandra Sanchez
Office of Assistant Secretary - Lands and Minerals
849 C Street NW
Washington, DC 20240

Cc: Linda Heath, Deborah McGlothlin, Roy Barbour

RE: **Best practices for protecting mature and old-growth forests on federal lands**

Dear Secretary Vilsack, Secretary Haaland, Mr. French, and Ms. Sanchez:

President Biden signed Executive Order 14072 to advance a science-based strategy for conserving US forests for their climate, biodiversity, and community benefits. As part of that strategy, the USDA and USDI have been tasked with completing an inventory of mature and old-growth forests on federal lands and developing policies to reduce threats. The EO also calls for a robust public input process as those policies are developed. With that in mind, the undersigned organizations and individuals are writing to express their interest in engaging with USDA and USDI staff to help define what forests should be included in the inventory, what added value this new inventory process can create, key threats to these forests, and what policies should be implemented to reduce these threats. Below are a few initial recommendations we hope will be addressed during both the inventory and policy development phases of your work:

Defining mature and old-growth forests

One of the most acceptable and trackable definitions of mature forests are those that have reached their maximum growth potential, or culmination of mean annual increment (CMAI). This is also the age at which carbon sequestration is maximized. The age at which this

happens varies considerably and can range from 40 to 130 years depending on the species and site-specific factors (1). Defining mature forests in this way will help protect the communities of wildlife, fish and plants that have evolved to depend on mature stands of different types in different places with different maturity ages. Old-growth forests are those that have aged enough to acquire telltale characteristics, such as large, old trees, snags, downed logs in multiple stages of decay, multi-storied canopies and a large diversity of ecological niches and species that depend on these niches (2).

Building on existing inventories and concentrate on gaps

While we applaud efforts to inventory mature and old-growth forests we also want to be sure that the USDA and USDI are not reinventing the wheel and ignoring the many rigorous ground based, aerial, and satellite inventories that already exist. For example, Wild Heritage, collaborating with Griffith University in Australia and the Woodwell Climate Research Center, has completed an inventory already. In addition, the extent of these forests, their integrity, and their management status has been well documented in a number of regional, national and global studies. We hope that the USDA and USDI will use this opportunity to add value to rather than replace those inventories, such as by improving their spatial resolution or addressing forest types that have not been well-studied. Most of the publications associated with these inventories specify next steps for improving their accuracy and expanding their scope (3,4). The USDA and USDI should partner with these independent researchers to implement those recommendations.

Moratorium on federal projects that destroy or degrade mature and old-growth forests

Mature and old-growth forests represent just a fraction of the nation's forested landscape and their historical extent- we already know this. According to your 2017 Forest Resources of the United States mature forests of 100 years in age and up represent just 66.5 million out of 514.4 million acres across all ownerships in the US (5). This share (13%) is far below the historical extent of mature and old-growth, which typically represented the spatial majority of most forest types (6).

Given this, we ask that you mirror what the Administration did for oil and gas drilling on public lands (EO 140008) and place a moratorium on federal projects that would log mature and old growth forests until long term management plans can be put in place to ensure recovery of these endangered ecosystems. We ask that this moratorium also halt post-fire logging proposals in mature and old-growth forests that recently experienced wildland fire, given the well-documented high biodiversity and carbon storage in such post-fire habitat. Many of the signatories to this letter are now compiling information on such federal projects on national forest and BLM managed lands and we look forward to meeting with you soon to review urgent priorities.

Late successional reserves on all federal forestlands

The federal strategy for protecting mature and old growth forests should not stop at what now exists but rather should seek to restore the extent of these forests back to their natural abundance and distribution on the landscape. Forest plans should designate and manage late successional reserves (LSRs) - much like they do in the Pacific Northwest - for development and maintenance of late successional forest conditions in perpetuity. These reserves can be strategically located to maximize their contribution to carbon storage and biodiversity goals (7). The Chief of the Forest Service and Director of the Bureau of Land Management can issue interim national directives to accomplish this now, followed by amendments to planning regulations to ensure that LSRs are a required component of forest plans as they are revised over the next decade (8).

Logging will not protect mature and old-growth forests from wildfires

We are concerned that the USDA and USDI are continuing to embrace false narratives and allocate billions of taxpayer dollars to commercial logging projects that increase, rather than decrease wildfire risk. Protecting mature and old growth forests from wildfires means no commercial logging in and around these stands because such logging puts more flammable slash on the ground, opens up canopies to the hot sun, increases wind speeds that fan the flames, and increases human access, which is by far the number one cause for most ignitions. The most comprehensive study of western wildfires ever conducted consistently found that fire severity and rate of spread is far greater in logged areas and timber plantations than the unmanaged areas where most mature and old growth stands exist (9).

In Oregon's recent megafires, it was the timber plantations, mostly found on private lands, and not mature and old growth forests on federal lands that burned most intensely and presented the biggest risks to nearby communities (10). Moreover, "thinning" kills far more trees than it prevents from being killed in mature and old-growth forests, and thinning results in far higher carbon emissions per acre than wildfire alone (11). As such, the policies you select for protecting mature and old growth forests should not include commercial logging in these stands but rather a range of activities - like decommissioning roads and removing invasive species - to minimize risks from large-scale fires.

Comprehensive evaluation of threats

Lastly, we want to make sure that the full range of threats to mature and old growth forests are addressed in this process. Logging, grazing, mining, oil and gas development, roads, infrastructure, invasive species, off road vehicle use, fire suppression and timber poaching are some of the human activities of most concern. In addition, edge effects caused by logging and development on adjacent parcels of state and privately held lands should be considered in the evaluation of threats, which can be mitigated through financial incentives,

changes to right of way agreements, or land acquisition to help establish buffer zones around mature and old growth stands you identify and propose for protection (12).

Thank you for the opportunity to share our concerns and recommendations with you. We look forward to engaging with you over the next year as this critically important process unfolds.

Sincerely,



John Talberth, Ph.D. (point of contact)
Co-Director, Forest Carbon Coalition
1322 Washington Street Box 705
Port Townsend, WA 98368
jtalberth@sustainable-economy.org
(510) 384-5724

Signatories

Michael Garrity	Alliance for the Wild Rockies	Helena, MT
Shelley Silbert	Great Old Broads for Wilderness	Durango, CO
Kimberly Baker	Klamath Forest Alliance	Arcata, CA
Thomas Wheeler	Environmental Protection Information Center	Arcata, CA
Joan Maloof	Old-Growth Forest Network	Berlin, MD
Ellen Moyer, PhD	Greenenvironment, LLC	Southampton, MA
Laurell Facey	WSFA	Wendell, MA
Paul Hughes	Forests Forever	Berkeley, CA
Philip Fenner	North Cascades Conservation Council	Seattle, WA
Monica Bond, PhD	Wild Nature Institute	Weaverville, NC
Michele Crist		Boise, ID
Jane Pargiter	EcoFlight	Aspen, CO
David Perk	350 Seattle	Seattle, WA
William S. Kibler	Raritan Headwaters	Bedminster, NJ
Rick McGuire	Alpine Lakes Protection Society	Wenatchee, WA
Michael Kellett	RESTORE: The North Woods	Concord, MA
Paula Hood	Blue Mountains Biodiversity Project	Eugene, OR

Heather Ikeler		Portland, OR
Bryant Baker	Los Padres ForestWatch	Santa Barbara, CA
Sunny Thompson	Center for Responsible Forestry	Ashford, WA
Patricia Hine	350 Eugene	Eugene, OR
Don Ogden	The Enviro Show	Florence, MA
Bob Doppelt		Eugene, OR
Caleb Merendino	Waterway Advocates	Fort Lauderdale, FL
Dean Wallraff	Advocates for the Environment	Shadow Hills, CA
Hunter Lovins	Natural Capitalism Solutions	Longmont, CO
Sean Jacobson	SunrisePDX	Portland, OR
Sally Keely	Cascadia Climate Action Now	Kalama, WA
Mary Gutierrez	Earth Ethics, Inc.	Pensacola, FL
Cindy Haws	Umpqua Natural Leadership Science Hub	Myrtle Creek, OR
Jeff Stant	Indiana Forest Alliance	Indianapolis, IN
Janice Reid	Umpqua Watersheds	Roseburg, OR
Laurie Dougherty	350 Salem OR	Salem, OR
Lilith Rogers	Save the Redwoods	Sebastopol, CA
Darlene Chirman	Great Old Broads for Wilderness	Portland, OR
Larry Glass	Northcoast Environmental Center	Eureka, CA
Larry Glass	Safe Alternatives for our Forest Environment	Hayfork, CA
Pauline Endo	Southern Forests Conservation Coalition	Wilmington, NC
Jared Kennedy	Greater Hells Canyon Council	La Grande, OR
Rita Frost	Dogwood Alliance	Asheville, NC
Matt Simmons	Environmental Protection Information Center	Arcata, CA
Mary Booth	Partnership for Policy Integrity	Pelham, MA
Serena Barton	Deer Creek Valley NRCA	Selma, OR
Selden Prentice	350 Seattle	Seattle, WA
Roger Luckmann	Elders Climate Action	San Jose, CA
Kirstin Beatty	Last Tree Laws	Holyoke, MA
Andrew Rothman	WildEarth Guardians	Denver, CO
Brenna Bell	350PDX	Portland, OR
Chad Hanson	John Muir Project of Earth Island Institute	Big Bear City, CA

Ernie Niemi	Natural Resource Economics	Eugene, OR
Marily Woodhouse	Battle Creek Alliance/Defiance Canyon Raptor Rescue	Manton, CA
Madeline Cowen	Cascadia Wildlands	Eugene, OR
Diane Waddell	JOY	St. Joseph, MO
Diane Waddell	Earthkeepers of Heartland Presbytery, PCUSA	Kansas City, MO
Cara Christofferson	Bark	Portland, OR
	Sonoma County Climate Activist Network	Santa Rosa, CA
Heather Cantino	Athens County's Future Action Network	Athens, OH
Angela Jensen	Umpqua Watersheds 501 (c)(3)	Roseburg, OR
Anne Jacopetti	350 Sonoma	Santa Rosa, CA
Caleb Merendino		Fort Lauderdale, FL
Andy Wood	Coastal Plain Conservation Group	Hampstead, NC
Davis Mounger	Tennessee Heartwood	Chattanooga, TN
Michael Morrison	Pacific Rivers	Portland, OR
Darilyn Parry Brown	Greater Hells Canyon Council	La Grande, OR
Christine Canaly	San Luis Valley Ecosystem Council	Alamosa, CO
Sarah Smith-Paugh		Morgantown, WV
William S. Kibler	Raritan Headwaters	Bedminster, NJ
Meredith Kiger	Friends of the Cheat	Morgantown, WV
Jimbo Buickerood	San Juan Citizens Alliance	Durango, CO
Ben Badger		Morgantown, WV
Jane Butler		Hedgesville, WV
Paul Hughes	Forests Forever	Berkeley, CA
Natalie DeBoer	Citizens Who Care	Henrico, VA
Kathryn Madison		Morgantown, WV
Pamela Ruediger	Friends of the Cheat	Parsons, WV
Susan Leopold	United Plant Savers	Rutland, OH
Paul Engelmeyer	Tenmile Creek Sanctuary	Yachats, OR

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