



Ms. Linda Walker  
Acting Director  
Ecosystem Management Coordination  
United States Forest Service  
201 14th Street SW, Mailstop 1108  
Washington, DC. 20250-1124

February 1, 2024

Dear Acting Director Walker,

The National Wild Turkey Federation is a wildlife conservation organization with healthy habitats as a cornerstone in our mission. We represent over 250,000 members across the United States and collectively with our partners, we have conserved or enhanced more than 23 million acres nationwide. Our 40-year partnership with the USDA Forest Service is based on implementation of forest health practices across the U.S. We actively engaged in the public review process related to Executive Order #14072 and provided comments. Thank you for this second opportunity to respond to the USDA's request for public comments on this proposed Old Growth policy, listed in the Federal Register as: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

Active forest management is often necessary to achieve healthy habitats to address many forest threats, including increasing development and people living in the wildland-urban interface (WUI), land use patterns and changing climate. It is also critical to consider that many wildlife and plant species, including imperiled species, are dependent on early seral stage forests and disturbance. The United States Forest Service (USFS) can and should strive for a management strategy that targets a diversity of seral stages; as all seral stages have forest, wildlife, water, and recreational value. Significant protections are already in place for old growth through forest planning efforts. We reiterate our previous recommendation to encourage the use of existing protections for old growth forests.

#### Threats

- The USFS inventory and analysis of existing old growth and mature forests and their threats documented wildfire, insects and disease as the most significant threats to old growth and mature forests. To protect existing old growth and develop mature and old growth characteristics in the future, management planning must prioritize reducing and mitigating the impacts of these threats.
- Additionally, the inventory and analysis revealed historical fire suppression efforts have contributed to the current vulnerabilities of old-growth and mature forests. Future efforts need to include active management, followed by prescribed fire to protect old growth and mature and manage adjacent forests.

- Active forest management and sustainable timber markets are critical to the long-term protection of old growth and mature forests and are needed to successfully implement the USFS Wildfire Crisis Strategy (WCS).
- The health of our forests and the sustainability of old growth and mature forests requires flexibility and a variety of management practices and tools. We have concerns, and thus caution against, the addition of this amendment into forest plans in a way that negatively impacts the ability of the USFS to use all tools at their disposal to address the wildlife crisis facing our country, specifically our Western forests.

### Management

- Incorporating amendments into 128 existing Forest Plans cannot result in significant delays to management activities. The amendment timeline must be efficient and timely while allowing critical work to continue.
- The USFS must have the flexibility and authority to treat and protect old growth and mature forest stands and implement management strategies that accelerate old-growth characteristics. In many instances, large trees come about through a lack of competition. Management activities that reduce tree densities can play an important role in developing old growth characteristics.
- Healthy forests play a huge role in carbon storage and sequestration. One of the primary values of old growth forests is carbon storage, as large trees store significant amounts of carbon. When old trees die, they emit carbon through decomposition. Smaller, fast growing trees sequester carbon at a faster rate and are also important for long-term carbon storage. Future forest management must account for the full carbon cycle and manage for diverse forest stands with all age and size classes.
- Protection of old growth and mature forests should not result in the loss of focus by the USFS on other land uses or management priorities and objectives within forest plans, etc. (e.g., wildfire crisis strategy, sensitive species management, multiple uses, establishment and development of early seral stage stands, and a sustainable timber industry).
- Ensuring the development of “place-based” management strategies for ensuring the future of old growth and mature forests, as noted in the scoping document will be critical for success.
- We support the direction that if existing plans are more restrictive with respect to actions that impact old growth forests, those existing plans would govern.
- We support framework flexibility for a wide variety of forest types, geographies, topography, and management regimes.
- Future monitoring will be important to inform an adaptive management approach to ensure the future maintenance of old growth and mature forests as proposed through the establishment of a National Old-Growth Monitoring Network.

### Wildlife

- A variety of seral stages is desirable for many wildlife species, including early seral stage forests. It is critical that forests that are not currently meeting their early seral stage

management objectives do not lose the management tools and authority to reach those goals. Collectively, old-growth and mature forest stands are often overrepresented on the landscape than prescribed in forest plans, while young forest/early seral stage forest plan goals continue to be largely un-met.

- Management decisions that result in small gains in the name of carbon sequestration do not outweigh potentially large negative impacts to wildlife species. Carbon sequestration and storage via old growth forest management can be compatible with understory management for wild turkeys and other wildlife that depend on mixed seral class forests and openings during their lifecycles.
- Old growth associated species may have complex habitat requirements that cannot be fully satisfied by old growth, such as the northern spotted owl that nests in old growth and forage in openings. Large-scale, high-severity wildfires are the largest threat to California spotted owls and Mexican spotted owls. These fires displace owls into other areas and force them to establish new territories often in lower-quality habitat. The 150,000-acre Las Conchas Fire in Bandelier, NM burned 58 percent of all Mexican Spotted Owl PACs and had tremendous impacts on the population.
- The old growth management framework should also include the requirements of some wildlife species for specific patch sizes and proximity to other habitats.
- Some landscapes do not support old growth forests due to routine disturbance, such as fire, wind throw, flooding, etc. Mature stands can provide opportunities for silviculture and forestry practices, local economic development, provide critical wildlife habitat, aid in carbon sequestration, etc.

In closing, the proposed amendment reflects a national intent to maintain and improve amounts and distributions of old-growth forest conditions within national forest ecosystems and watersheds so that old-growth forest conditions are resilient and adaptable to stressors and likely future environments. Proactive stewardship to develop climate resilient forests and future old-growth forest conditions must go beyond the moment and focus on management for the long term. Management must go beyond preservation and include management for all species, age and size classes.

Thank you for this opportunity to comment on our future forest health conditions.

Respectfully,



Kurt W. Dyroff

Co-CEO

National Wild Turkey Federation