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Response to *Advanced Notice of Proposed Rulemaking*, RIN 0596-AD59

Dear Deputy Chief French, Director Swanston, and Policy Office Director:

The Forest Stewards Guild appreciates the opportunity to provide a response to
the United States Forest Service's Advanced Notice of Proposed Rulemaking
(ANPR) implementing President Biden's Executive Order 14072 (EO 14072),
Strengthening the Nation's Forests, Communities, and Local Economies. Our
letter complements comments submitted by Silvix Resources and others.

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 benefits such
as wildlife habitat, species diversity, hydrological regimes, nutrient cycles, carbon
storage, and numerous other ecological processes. They inspire a sense of awe,
offer recreational opportunities, and hold spiritual values for many.

We agree with the recognition in EO 14072 of the irreplaceable values of mature
and old growth forests and the existential threat the changing climate poses to
communities and forests of all types. We also agree with the comments from
Silvix Resources and others that a central goal for National Forest management is
ecological integrity.

The ANPR asks **how to include Indigenous Knowledge and respond to the impacts of climate change on Tribes.**

We agree with comments from Silvix Resources and others that emphasize that the Forest Service should fulfill the federal government's trust and treaty obligations and commitment to Tribal co-stewardship by authentically engaging Tribes in the co-development and implementation of comprehensive "climate-smart forestry" policy. Indigenous Knowledge has a critical role in the management of these lands and implementation of climate-smart forestry.

The ANPR asks **How should the Forest Service adapt current policies and develop new policies and actions to conserve and manage the national forests and grasslands for climate resilience?**

Stewardship can enhance and maintain forest characteristics that confer resilience and resistance to stress and change. Forestry that uses nature as a model is a good approach for ensuring healthy ecosystems that are best able to adapt to a changing climate. Stewardship should maintain ecological characteristics critical to forest health such as biological legacies, structural and compositional heterogeneity, and appropriate recovery periods between disturbance events. Encouraging a naturally diverse species mix will spread the climate change risks across multiple species. Land conservation and management must focus on ecological processes and functions rather than just focusing on temporary conditions. In responding to climate change, managers will need to balance activities that support current species association with those activities that favor species associations that may be more suitable to future environments. When ecologically, economically, and socially appropriate, management should help forests mitigate increasing CO_2 levels by sequestering and storing greater quantities of carbon. While there is a lot of work yet to do to define the practices of climate-smart forestry for each ecosystem, it clearly requires *mitigation*, *adaptation,* and even *transformation* as per the Guild's Climate Change Policy Statement.[1]

Successful management of public lands requires engagement of communities dependent on and affected by National Forests in authentic collaboration. Research and experience both show that a commitment to long-running, inclusive collaboration rewards all involved by building trust, motivating progress, leveraging resources, prioritizing effectively, and maintaining momentum.[2]

As Silvix Resources and others emphasize in their comments, a formal rulemaking could address mature and old growth conservation, cement climate smart forestry practices in regulation, and center ecological integrity as a goal, while also proactively considering the needs and diverse values of adjacent communities.

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[1] Forest Stewards Guild. 2008. Climate Change Policy Statement https://foreststewardsguild.org/wp-content/uploads/2019/12/Policy_Climate_Change.pdf
[2] Evans et al. 2015. Evaluating the Effectiveness of Wildfire Mitigation Activities in the Wildland-Urban Interface https://foreststewardsguild.org/wp-content/uploads/2019/05/WUI_effectivenessweb.pdf

A central question of the ANPR is **How might the Forest Service use the mature and old-growth forest inventory together with analyzing threats and risks to determine and prioritize when, where, and how different types of management will best enable retention and expansion of mature and old growth forests over time?**

Given the dramatically reduced extent of old growth forests,[3] it is important to establish policies that protect old trees and old growth stands and encourage mature forests to grow old. Forest processes, such as wildfire and wind are essential (even in old growth forests) for long-term sustainability, regeneration, and resilience in the face of a changing climate. Active management may be required to protect old growth forests from uncharacteristic wildfires, invasive species, and other anthropogenic stressors.

Some mature forests can become old growth in the future and management can help foster and even accelerate the development of old forest characteristics in mature forests. 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.

As described and refined in the comments from Silvix Resources and others, the management regime for mature and old growth forests suggested by the Connecticut Division of Forestry provides a useful conceptual frame. This approach involves delineating old and mature forests into five classes:
- Old growth forests that need little to no intervention for protection.
- Old growth forests that need management to survive.
- Mature forests that need little to no intervention to develop old forest characteristics.
- Mature forests that need management to develop old forest characteristics.
- Mature forests managed for other conditions (e.g., young forest conditions or timber).

Determining the extent and location of each of the five classes will require broad collaboration and targeted research. Better understanding of the natural range of variability in the extent of old growth forests will be crucial. Other tools such as the Resilient and Connected Landscape maps,[4] Climate Risk Viewer, Potential Operational Delineations for fire management, and the Forest Service's new Threat Assessment provide the information needed to identify areas that would be ecologically appropriate for different categories. Equally important are the social and economic conditions around National Forests. These can be included in decision making with tools such as
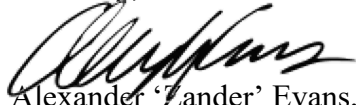
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[3] See for example Lindenmayer et al. 2012. Global decline in large old trees. https://doi.org/10.1126/science.1231070 and National Commission on Science for Sustainable Forestry 2008. Beyond Old Growth: Older Forests in a Changing World.
[4] Anderson et al. 2023. A resilient and connected network of sites to sustain biodiversity under a changing climate. https://doi.org/10.1073/pnas.2204434119 https://toolkit.climate.gov/tool/resilient-and-connected-landscapes

the National Forest Socioeconomic Indicators Tool and the Rural Capacity Map.[5] Using these tools within a collaboration of affected parties is the best hope for effective, lasting strategies for ecologic integrity and climate resilience.

Thank you for the opportunity to provide comments in response to the Forest Service's ANPR. We look forward to working with you to conserve and restore mature and old growth forests and ecological integrity.

Sincerely,

Alexander 'Zander' Evans, PhD
Executive Director
Forest Stewards Guild

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[5] https://headwaterseconomics.org/tools/forest-indicators/tool-about/
https://headwaterseconomics.org/equity/rural-capacity-map/