Forest Service **Washington Office** **1400 Independence Avenue, SW**
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To: Deputy Chiefs, Regional Foresters, Station Directors, and Forest Supervisors

As you may be aware, I have decided to withdraw the National Old Growth Amendment Draft Environmental Impact Statement. However, this process has helped us to identify a wealth of best available scientific information and engage with many to gain important insights that can help to guide our future stewardship of these special forests.

During this process, we learned that old-growth forests hold many values important to the American public. These forests offer wildlife and fisheries habitat, recreation, soil productivity, carbon sequestration, water quality and aesthetic beauty. They also hold diverse Tribal, spiritual, and cultural values.

Over the past two and a half years, we have worked to better understand where these forests are across the National Forest System, assess the threats they face, and learn more about how we can better steward these forests and the values they represent for current and future generations. Our goal has been to improve our ability to consistently steward old growth forests so that they are present, high-functioning and resilient into the future and can contribute to ecological integrity, alongside other key elements of ecological integrity.

We published initial definitions and an inventory report in April 2023, and an updated report in May 2024, followed by a threats analysis in June of 2024, that have helped us to identify best available scientific information, which includes Indigenous Knowledge, to support future stewardship of old growth forests. We gained important insights from the Braiding Sweetgrass report published in March 2024, which helped us to bring together Indigenous Knowledge and western science. Through multiple comment periods, including from the Advanced Notice of Proposed Rulemaking on Climate Resilience and the proposed National Old Growth Amendment, listening sessions, science forums, and other meetings, we gained insights and feedback from thousands of members of the public, agency employees from the field to the Washington Office, partners and stakeholders, and state, local and Tribal governments. We also learned from thoughtful conversations with cooperating agencies, and through formal consultation with Tribal nations. We have gained a wealth of information and perspectives from these engagements, and we deeply appreciate the input we received from so many.

Through this letter I am sharing some of the key learning and feedback with you, with the intent that you can make use of this learning to inform place-based conversations for planning and project management so that we can successfully steward old growth forests into the future.

We heard clearly that old growth forests are culturally and ecologically important to Americans, and that there is broad support for old growth conservation as an essential component of ecological integrity. There is strong support for, and an expectation of us, to continue to conserve these forests based on the best available scientific information.
There was also feedback that there are important place-based differences that we will need to understand in order to conserve old growth forests so they are resilient and can persist into the future, using key place-based best available scientific information based on ecological conditions on the ground.

Moving forward, we have the opportunity to identify where old growth conditions may be departed from desired conditions or vulnerable to reasonably foreseeable threats, versus where conditions are high-functioning and less vulnerable to threats. Understanding these differences will enable us to make intentional management decisions so that we can provide for ecological integrity and maintain, conserve, recruit and steward old growth forest conditions with ecologically appropriate representation, distribution and abundance, based on place-based assessments of what is most needed.

For example, we learned through our threats analysis and heard through our engagement process that in many places across the National Forest System, the retention, conservation, stewardship, and recruitment of old growth will require science-based, ecologically-sound forest management, including through the use of vegetation treatments and beneficial fire, to create long-term resilience—including within priority landscapes associated with the Wildfire Crisis Strategy. We heard and recognize the urgent importance of reducing the risk of high-severity wildfire, which is a leading threat to old growth forests.

We also heard and learned that in other places across the National Forest System, old growth forests are functioning properly without intervention. For example, we heard that dry forests and wet forests likely need different prescriptions, and that there are key differences between ecosystems with frequent fire return intervals versus those with more infrequent fire regimes.

As you revise or amend management plans, I encourage you to consider the following goals for stewardship of old growth forests, based on the best available scientific information:

- Old growth forests contribute to ecological integrity within the plan area;
- Old growth forests are conserved so that they are high-functioning, resilient and adaptable to stressors and occur with ecologically appropriate representation, distribution and abundance;
- Recruitment of forests into old growth contributes to the maintenance or restoration of ecological integrity through the continued presence, expansion, distribution, abundance, quality and condition of old growth forests, in light of reasonably foreseeable threats and stressors; and
- Conservation and management of old growth forests takes into account Tribal priorities and values, contributes to upholding treaty rights and trust responsibilities, and integrates Indigenous Knowledge as a source of best available scientific information (BASI), with safeguards for data sovereignty.

I also encourage you and your line officers to consider developing outyear programs of work that are informed by:

- The best available scientific information on the current abundance, distribution, and resilience of old-growth forests and any site-specific threats;
- The perspectives of state and local governments, Tribal Nations, partners and stakeholders to inform project planning and management of old growth forests;
- Where old growth forest conditions are departed from the desired condition or vulnerable based on reasonably foreseeable threats, including from wildfire, insects and disease, consider ways to restore those forests and their contribution to ecosystem integrity.
- Where old growth forests are in good condition and less vulnerable to future threats, consider ways to protect and maintain those forests, including using a passive management approach where appropriate.
- Consider what tools are most ecologically appropriate based on the underlying conditions, and refer to best practices outlined in the silvicultural technical guide for old growth, including for retaining large trees in old growth stands as appropriate for each forest type.

As you consider management decisions for the long-term stewardship of old growth forests, I encourage you to continue to improve the ways we integrate Indigenous Knowledge and western science into our decision making, incorporate the ethic of reciprocity and responsibility to future generations in our agency culture, and identify future opportunities to enable co-stewardship of Forest Service lands, including for cultural burning, prescribed fire, and cultural and medicinal uses and activities, as part of consideration and respect for Tribal sovereignty, treaty rights, interests and priorities.

I also encourage you to continue to engage with and learn from our partners in other federal, state and local agencies and identify areas for continued collaboration and through our work with many partners to reduce wildfire risk to people and communities, restore watershed function, recover after natural disasters, and address a range of cross-boundary issues.

While this letter reflects lessons learned at the national level, decisions on maintaining or restoring old growth forest conditions so they are resilient and persist into the future will be made at the local level, informed by the best available science, public engagement, contributions from cooperating agencies, and consultation with Tribes. The learning shared in this letter will allow you to tailor your actions to local conditions while reflecting national considerations for old-growth conservation.

At the national level, we continue to support external partners, universities, the regions and the field by providing updated information on the amount and distribution of old growth forests and threats posed by natural disturbances and other factors, including by continuing to update the nationwide inventory of old growth and mature forests with additional information from the field as well as remote sensing data. We are currently working to develop finer-scale data layers, building on the 2024 inventory of old growth and mature forests, and adding to information currently available in the Climate Risk Viewer. We will continue to partner and share data to expand our understanding of old growth and mature forests.

The national review of projects that include active management in old growth forests is giving us valuable information regarding the scope and parameters of work happening across the National Forest System. For example, 90% of the proposed project activities in old growth are to deploy

prescribed fire as the primary management tool to restore conditions and improve resilience. This process supports consistency while enabling timely restoration work based on local conditions and threats.

We will also conduct monitoring to support regional and local decision-making and adaptive management of old growth conditions. The recently published update to national monitoring direction will also support the framework for monitoring old growth conditions over time.

I would be remiss in failing to recognize the dedicated team of leaders from across the Forest Service who have contributed their time, energy and expertise over the past two and half years as we embarked on this work. Your dedication and professionalism have been invaluable. The information gleaned and the lessons learned will continue to benefit our agency long into the future.

I continue to appreciate the conservation values at the heart of our stewardship of our nation's forests and grasslands. Thank you for your continued commitment to protecting these vital forest resources for future generations.

RANDY MOORE
Chief