

# National Old-Growth Amendment

## What Is Old Growth?

Old-growth forests are those in late stages of stand development, as identified by tree size, canopy layers, large dead woody material, species composition, and ecosystem function.

## Why Is Old Growth Important?

Old-growth forests provide significant benefits to the American people by storing carbon, providing important habitat for wildlife, and contributing to clean air, soil, and water. They also provide other benefits like subsistence and cultural uses, as well as outdoor recreational opportunities and forest products that contribute to sustainable local economic development.

## Old-Growth Forest Value

**Ecosystem**  
They are life support systems – constantly contributing to air, soil, and water quality and diverse habitats.

**Recreation**  
Old-growth forests stimulate local economies through recreation activities such as hiking, camping and sightseeing.

**Connection**  
They provide opportunities for people to connect to the land through hunting, gathering, and fishing.

**Community**  
They offer a sense of place and community and provide beauty, peace, and wonder.

**Carbon**  
Old-growth forests capture and retain climate-warming carbon.

**Tradition**  
Old growth supports cultural and Indigenous traditions, including wild harvest and the use of forest products to build shelter, tools, art, and carry out spiritual traditions.

USDA is an equal opportunity provider, employer, and lender.

People value old-growth forests for many reasons, including their ability to store carbon and provide other ecosystem services, as places to recreate and connect with the land and community, and for their role in cultural and Indigenous traditions.

## Why a National Old-Growth Amendment?

The U.S. Department of Agriculture, Forest Service continues to respond to Executive Order 14072 (“Strengthening the Nation’s Forests, Communities, and Local Economies,” issued by the Biden Administration on April 22, 2022) by prioritizing work to address changing climates while fostering healthy, resilient forests and ecosystems.

This work includes the [Mature and Old-Growth Definition, Identification, and Inventory report](#), as well as the [Mature and Old-Growth Threat Analysis report](#). The threat analysis revealed that current actions are not responsive enough to rapidly changing conditions. A Notice of Intent for the proposed National Old-Growth Amendment was released on December 20, 2023, and was followed by a public comment period.

## What Is the Purpose of the National Old-Growth Amendment?

The proposed National Old-Growth Amendment would be the first of its kind to amend all forest land management plans. It would be adaptive and allow the Forest Service to respond to rapid changes threatening national forests. It would also:

- Complement the implementation of the Wildfire Crisis Strategy
- Provide protective measures for old-growth forests and create a consistent national approach
- Build on current direction in forest land management plans and provide constraints on action that may affect existing or potential old-growth forest conditions
- Outline an adaptive management approach for the development of local strategies based on unique geographic locations and cultural and socioeconomic values of old-growth forests

The intended outcomes of the National Old-Growth Amendment are to:

- Improve the retention and recruitment of old-growth forests and their resistance to wildfire, insects, and disease
- Strengthen existing/future old-growth conditions to adapt to changing climates
- Incorporate Indigenous Knowledge for the stewardship of old growth
- Develop locally informed monitoring and adaptive management strategies

## What Has the Forest Service Heard?

### Public Comments

The public comment period for the Notice of Intent for the proposed National Old-Growth Amendment ended on February 2, 2024. A total of 7,300 comments were received.

Areas of agreement included:

- Support for the need to steward old-growth forests
- Local and condition-based decision making and implementation
- Clear role for Indigenous Knowledge to inform management

Concerns included:

- Timeline that will not allow for meaningful engagement/input
- Impacts to local economies
- Top-down approach that limits local input
- Desire for a more restrictive alternative that includes management restrictions on mature forests
- Detraction from Wildfire Crisis Strategy implementation

# What Has Changed?

## Draft Environmental Impact Statement

Changes incorporated into the Draft Environmental Impact Statement following the Notice of Intent reflect:

- Clarified intent and addressed unintended misconceptions
- A detailed crosswalk table that tracks intent and provides details on what changed from the Notice of Intent
- Specifications for place-based old-growth definitions/criteria to be used at the local level
- Added or changed standards/guidelines that encourage proactive management actions, especially for wildfire risk management and hazardous fuel reduction objectives

## Proposed Action Alternatives

The Draft Environmental Impact Statement includes the following proposed action alternatives:

### No Action (Alt 1)

- No land management plans would be amended.
- Old-growth direction as it currently exists in many land management plans would continue to guide management actions.
- For land management plans that do not currently contain old-growth direction, none would be added.

### Modified Proposed Action (Alt 2) (PREFERRED ALTERNATIVE)

Land management plans fall under one of the following categories:

- **Category 1:** The unit is a grassland that is predominantly unforested and limited management actions occur in areas that are forested. These plans will be exempted from the amendment unless there are unique

circumstances presented that would justify amending them with a subset or full suite of plan components.

- **Category 2:** The plan contains some old-growth direction or components but was not found to be functionally meeting the intent of the plan components/content proposed as part of this amendment.
- **Category 3:** The plan has no existing direction or plan components regarding old growth.
- **Categories 2 and 3:** The plans would be amended with the full suite of proposed plan components, unless unique circumstances were presented to exempt these plans from the amendment.

### More Restrictive (Alt 3)

- The land management plans would be exempted or amended as described for the Modified Proposed Action (Alt 2).
- The plan components and content as described for the Modified Proposed Action (Alt 2) would apply, but Standard 3 would be updated to: "Proactive stewardship in old-growth forests shall not result in commercial timber harvest."

### Less Restrictive (Alt 4)

- The land management plans would be exempted or amended as described for the Modified Proposed Action (Alt 2).
- The plan components and content as described for the Modified Proposed Action (Alt 2) would apply, but Standards 2.a, 2.b, 2.c, and 3 would be dropped entirely.

## What Is the Modified Proposed Action?

As the preferred alternative, the Modified Proposed Action includes:

- A **statement of roles and contributions** of National Forest System lands in supporting old-growth forest conditions
- A **goal** for braiding Indigenous Knowledge into the science of managing these systems
- A **management approach** for establishing a geographically informed “Adaptive Strategy for Old-Growth Forest Conservation”
- **Four desired condition statements** that reflect the positive outcomes to be achieved
- **Four objectives** for measurable, positive outcomes on the ground
- **Three standards** that establish definitions and restrict management actions to those that encourage conservation, preservation, and recruitment of old-growth conditions, provided sideboards for deviation
- **Three guidelines** to frame proactive management actions and protect iconic trees outside of old-growth conditions
- **Monitoring requirements** to measure and ensure that management activities are fostering increasing positive trends in old-growth conditions

The following changes were incorporated into the Modified Proposed Action:

- The **statement of roles and contributions** contains revised language describing importance of old-growth forests to Tribal and Indigenous cultures and practices.
- The **goal** added language to clarify that it applies to the National Old-Growth Amendment.

- The **management approach** added three new sections to emphasize development of local strategies in areas that have inherent capability and to clarify that the strategies can include multiple forests.
- The **desired condition statements** combined and simplified the desired conditions from the Notice of Intent, as well as added new or expanded language to recognize ecosystem services, carbon, ecological integrity, and other successional stages.

## What Is Proactive Stewardship?

Proactive stewardship is management that promotes the quality, composition, structure, pattern, or ecological processes necessary for old-growth forests to be resilient and adaptable to stressors and likely future environments. It includes prescribed fire, timber harvest, and other mechanical/nonmechanical treatments for the purposes such as, but not limited to, hazardous fuel reduction and wildlife habitat improvement.

## What Are the Next Steps?

- 90-day comment period
- Review and analysis of comments
- Endangered Species Act dialogues
- Release of final Environmental Impact Statement winter 2024/2025

See the [National Old-Growth Amendment webpage](#) for more information and updates.

