

OUTDOOR ALLIANCE

Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

The outdoor recreation community benefits greatly from recreating in and around old growth forests, as well as from the vital ecosystem services like carbon storage and water filtration that these forests provide. Old growth forests provide irreplaceable recreation experiences on USFS and BLM lands at places like the Smith River National Recreation Area in California, the Joyce Kilmer Memorial Forest in North Carolina, and the Valley of the Giants Outstanding Natural Area and other unlogged BLM lands in the Oregon Coast Range. These areas and others provide outstanding ecological and scenic values and also allow recreationists to gain a deeper understanding of forest ecosystems and the natural history of our public lands. These experiences help to build a strong stewardship ethic within our community which in turn supports the conservation and protection of old growth and mature forests over time.

We strongly support the initiative to define, inventory, and protect old-growth and mature forests across federal lands, and we look forward to using the inventory for recreation planning once it is available. Because of the patchwork nature of old growth stands on USFS and BLM lands, recreationists are sometimes unaware of the overlap between old growth forests and recreation sites like rivers, trails, and crags. An accurate inventory will improve our community's understanding of the location and spatial extent of these sites and will allow us to better address conservation concerns related to old growth and mature forests throughout our policy, land management planning, and communications work.

From our perspective, this inventory will be most useful if it is designed as a tool to directly influence on-the-ground conservation and restoration actions. We envision using the inventory in our work to inform land management and project planning, and in helping design future conservation efforts. As such, the final inventory should be publicly accessible and spatially explicit. We also encourage the USFS and BLM to design the inventory so that it can be directly applied to inform existing plans, strategies, and mapping efforts such as the USFS 10-Year Wildfire Crisis Strategy and Implementation Plan, forest plan revisions, resource management plans, and the Fireshed Risk Map and GAP Analysis and Decision Support Tool



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required by Section 2(a)(1) of U.S.D.A. Secretary's Memorandum 1077-004. The inventory should also be designed to inform conservation actions under the Biden Administration's America the Beautiful Initiative, and should be incorporated into the forthcoming American Conservation and Stewardship Atlas.

With regard to the definition developed for old and mature forests, we recognize that a one-size-fits-all approach will not adequately capture the diversity of forest ecosystems found across America's public lands. We encourage the USFS and BLM to adopt a strong definition of old growth and mature forests that accounts for regional ecological variation in forest structure, function, complexity, and composition. Recreationists value the opportunity to visit a full spectrum of forest ecosystems, ranging from the temperate rainforests of the Pacific Northwest, to the arid bristlecone pine forests of the Great Basin, to the northern hardwood and boreal forests of New England, to the fire-dependent longleaf pine forests of the southeast, and beyond. It is critical that the definition framework developed by the USFS and BLM adequately captures all of these ecosystems, as well as the natural processes like fire, windthrow, and drought that influence their development.

Finally, we request that USFS and BLM provide additional opportunities for public comment on a draft of the definition framework and to provide place-specific information to inform the inventory. This will allow stakeholders an opportunity to further refine input based on a better understanding of the agencies' approach to meeting the requirements of E.O. 14072, including through site-specific input. Additional public engagement will help produce a better-informed final inventory and will build a broader foundation of public support for the agencies' old growth and mature forest conservation efforts.

Thank you for the opportunity to comment on this important initiative. We look forward to working with you to support the conservation of old growth and mature forests as well as the other goals of E.O. 14072.

Best regards,



Louis Geltman



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