

## Friends of the Bitterroot comments on E.O. 14072

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**Christopher French, Deputy Chief  
U.S. Forest Service**

**Tracy Stone-Manning, Director  
Bureau of Land Management.**

On July 15, 2022 the Biden Administration published a [Request For Information](#) (RFI) in the Federal Register, seeking input on the development of a definition for old-growth and mature forests on Federal lands and requesting public input on a series of questions. This letter is response to the RFI from Friends of the Bitterroot (FOB), whose mission includes protecting the ecosystems of the Bitterroot region, Montana, and Idaho, where many old growth and mature forests are still found.

The stated purpose of the RFI is to take a step toward implementing President Biden's April 22, 2022 [Executive Order](#) (E.O.) 14072: *"Strengthening the Nation's Forests, Communities, and Local Economies."* Along with other policy statements E.O. 14072 *"calls on the Secretaries of Agriculture and the Interior, within one year, to define, identify, and complete an inventory of old-growth and mature forests on Federal lands, accounting for regional and ecological variations, as appropriate, and making the inventory publicly available."*

The most important characteristic of an old growth or mature forest is its structural and functional complexity. Simply containing a few large, old trees does not mean a forest functions as old growth. Instead, old growth forests contain trees of mixed ages and decaying wood that are respectively dispersed vertically and horizontally through the canopy and stand along with uncountable numbers of other organisms.

Because different forests contain dissimilar mixes of trees, plants, wildlife, and ecological systems that developed in response to local climatic conditions, it is impossible to design a universal definition for old and mature forests that can be applied to every forest. Such an endeavor is futile and pointless.

Definitions must acknowledge this diversity, and separate definitions will have to be developed for each species in each region/ecosystem. They would only be applicable to the forests for which they were designed. Regional definitions of old growth for some regions have already been developed (e.g. Green et al., 1992; Hamilton, 1993 for the Northern and Intermountain Regions, western US, respectively).

For example, in our region, Green et al. (1992) defined minimum screening criteria of different tree species for old growth. The principal quantitative, measurable criteria are age, size (dbh), and the number of qualifying trees per acre. Green et al. identify other important old growth characteristics, such as snags, down woody material, dead tops, decay, and multistoried and uneven aged structure, but give no measurable minimum criteria. Although the purpose of the definitions was for use in completing inventories, here in USFS Region 1, they are being used to cut more large old trees, contrary to the intent of the Executive Order and also to the management recommendations of many old growth researchers (Yanishevsky; 1994; Hessburg et al., 2015; Fielder et al., 2007a,b; Wales et al., 2007; Rapp, 2003).

Even if definitions can be agreed upon, it does not ensure that old growth will be preserved—that is also dependent on the quality of the inventory. Despite using Green et al.’s criteria on Bitterroot National Forest’s 2017 Westside project, stand exams, FIA data, and walk-through surveys failed to identify 25 acres of ponderosa pine-Doug fir old growth, the largest old growth stand in the project area. Twenty acres of it were subsequently logged and taken out of old growth status in violation of HFRA. BNF Supervisor Matt Anderson recently publicly stated his refusal to conduct the inventory required by the Executive Order. In the context of a Forest Plan Amendment specific to old growth, he stated: *“Due to the dynamic nature of stand progression, a forest-wide stand delineation of old growth will not be provided. Old growth is not a static state; natural disturbances such as windstorms, wildfire, insects and diseases can move a stand from one successional stage to another”*. In the same document, he then contradicts himself, saying the Forest Plan amendment *“will also comport with Executive Order 14072, which provides agency-wide direction for an inventory of old growth and mature forest”*. This all calls into question the validity of any inventory that might result from the Executive Order.

Defining mature forests is even more difficult than defining old growth, as no definitions or screening criteria have been developed. The simplest way to preserve both mature and old growth trees would be to impose an upper diameter (dbh) limit for each species in each ecosystem in each region. For example, in Bitterroot National Forest (BNF), an upper limit of 16 inches dbh for ponderosa pines might be reasonable. BNF considers the timber rotation period to be 75 years for ponderosa pine, and a 75-year-old ponderosa here probably averages 16 inches dbh.

However, although a diameter limit could preserve the **trees**, it will not necessarily preserve all of the ecosystem values offered by mature and old growth **forests**, including the unique habitats necessary for certain animals and plants to survive, clean air and water, and the aesthetic and spiritual values so appreciated by human visitors. And in some areas that already have diameter limits (eastern Oregon), USFS proposes to lift those limits in fuel reduction projects in order to save the forests from fire. However, Bartowitz et al. (2022) found *“that increasing harvest of mature trees to save them from fire increases carbon emissions rather than preventing them”*, a conclusion also reached by Campbell et al, 2011; Harris et al, 2016; Law and Warring, 2015; Law et al, 2017; Reinhardt and Holsinger, 2010; and Stenzel et al, 2019.

Finally, “adaptive management” is a term often used by the USFS, but is rarely, if ever, practiced. It requires post-project monitoring that is almost never done, followed by analysis of that data, which, of course, has not been collected. If the government was truly implementing “adaptive management”, it would have ended logging, mining, grazing, and other resource extraction on public lands long ago because, as the science shows, those activities heavily contribute to worsening the climate and biodiversity crises we now face.

Now that climate scientists have confirmed global warming is occurring at such an accelerating rate that humanity’s very existence is at risk, every possible effort should be made to mitigate and/or forestall the effects of rising worldwide temperatures. In short, everything which can be done should be. Conservation of not just old-growth and mature forests, but of all forests, must be pursued. Focusing only on old-growth forests as a solution, as is being suggested by this request for public input, is short

sighted, and does not recognize logging as the greatest threat to forest carbon sequestration. This attempt to discover a universal old-growth definition appears to be little more than an industry-supported diversion designed to allow the Forest Service and the Bureau of Land Management to continue providing tax-subsidized logs, albeit smaller ones, to the timber industry.

Thank you for considering these comments and the references provided below.

Jim Miller, President, Friends of the Bitterroot

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