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Mr. Jamie Barbour
Assistant Director
Ecosystem Management Coordination
USDA Forest Service
Washington, DC

RE : Fed. Reg. 42493-42494 Vol 87, No. 135 July 15, 2022 – Old Growth and Mature Forest Definition and Inventory

Mr. Barbour,

Please accept the following comments on the above referenced Federal Register Notice regarding the directive to "*define, identify, and complete an inventory of old-growth and mature forests on Federal lands.*" We appreciate the opportunity to provide input on this effort, but must proclaim that it is a fool's folly and inappropriately misdirects Agency and staff energy and resources away from the wildfire and forest health crisis that is undoubtedly the greatest threat to the very forest conditions the order is intended to protect.

First and foremost, it is important to understand that the term "old growth" is a social term, not an ecological term. Forests are ecosystems in continual change and progression. Forces of nature exist that preclude any human efforts of "protection" or "preservation".

While we understand the task at hand is to define, identify and inventory forests in this stage of succession, to try to define without the context of how that definition would be used is impossible. Similarly, to adopt a definition that is universally acceptable across the myriad of forest and ecological types is not reasonable.

Old growth and Mature are simply fleeting stages of forest succession that no amount of human effort can hold constant. It is only a point upon the relative timeline upon which we are able to observe a particular stage of forest development that would be characterized by these terms.

To illustrate, what if the effort at hand was to identify and inventory young growth forest? While the exercise of mapping would be relatively simple, if the goal was to "protect" young growth, would that even be possible? I think even the man on the street when asked if you could maintain a forest as young trees, would say it is impossible as you can not prevent trees from growing and aging over time. Similarly, to try to hold any successional stage in a constant phase is impossible. First year biology students are well versed in the concept of succession and progression under this scheme. It is fact. Forests are not static and attempts to treat them as such are ill advised.

So that leads us to the discussion of the second part of the order which is to "conserve" old growth and mature forests. It is important to realize that most forest plans on USFS lands already consider "old growth and mature" forest conditions and contain provisions to maintain or increase the represented acreage that falls within this designation. The forest plan or local planning document is the appropriate level to address the issue. This is simply due to the site-specific vagaries that apply to the local forest types, eco-regions and natural drivers of succession. To try to establish a common framework will undoubtedly result in conflicts with existing plans and protocols, not to mention hinder the project level management decisions that are best able to promote the desired forest condition.

In general, we state our objection to this wide-ranging process and suggest that supporting the extensive local work, recognizing the conservation priorities established by local plans, process and information, and acknowledging the vast expanse of public land that is already dedicated to allowing natural process to dictate forest conditions is the best strategy in meeting the objective of the order.

With regard to the specific questions in the RFI, please consider the following:

What criteria are needed for a universal definition framework that motivates mature and old growth forest conservation and can be used for planning and adaptive management.

We object to the concept of a universal definition framework, as it will be impossible to craft in a manner that allows consideration of the localized situation. It will undoubtedly be either entirely too broad or programmatically exclude forest types and conditions that may deserve consideration for conservation.

Furthermore, in order to have a universal definition, you need to identify the particular attributes of old growth that are the priority. Are we trying to protect old trees? What is considered old? Are we trying to protect a particular forest structure? Are we trying to establish guidance for scale, location and connectivity? What is the object we are trying to conserve by identifying old growth? Carbon storage capacity? Particular wildlife habitat elements? Are we only looking at forests that have achieved climax conditions for the forest type? Or are stands that contain old trees but in an early serial species mix considered mature?

As you can see, the elements of the broad subjective designation of old growth are not only widely ranging, but sometimes mutually exclusive. By including the phrase "motivates mature and old growth forest conservation" you have inextricably linked the definition to the unknown future policy that may follow.

What are the overarching old-growth and mature forest characteristics that belong in a definition framework?

It is impossible to describe characteristics that are common to the incredible range of ecological systems that occur across the 193 million acres of even just USFS managed lands. Old growth in the pacific north west may be characterized by closed canopy stands with shaded understory, while south west old growth would be diametrically opposed with very open canopies and sunny dry understory conditions. Large woody debris conditions in California redwood forests could never be part of an old growth condition in eastern seaboard hardwood forests.

Even forest level designation of old growth definitions are extremely difficult to craft as the variables are so site and stand type dependent. Using tree age is a poor indicator of old growth character as we can show many examples of stands of 5-6" trees that are as old as stands with average diameter of over 24" in Montana.

How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site productivity and geographic region?

The question illustrates the absolute futility in trying to establish a definition! There is simply too much variability in all of the factors listed to capture in a single definition. Furthermore, disturbance, by definition will force a stand to move out of the Mature or Old-Growth state.

How can a definition be durable but also accommodate and reflect changes in climate and forest composition.

Once again, the question illustrates the ineffectuality of the exercise. Old growth and mature is a not a "durable" state nor is it a state that will remain static in the face of changes in climate and forest composition! So, the goal should be to manage our public lands for the full range of natural conditions, ranging across all successional stages and ecotypes.

Natural processes function on the nearly 80% of public lands that are set aside for that purpose, national parks, wilderness areas, waterfowl and wildlife management areas etc... What would be the purpose of defining and mapping mature and old growth in these areas since nothing different will occur after the exercise than would today?

Those lands under multiple use mandates currently use active management as a way to guide change in a manner that is acceptable to the social pressures exhibited on that landscape. Human health and safety being the priority in the Wildland Urban Interface. Suitable timber base managed to meet the demands of society for wood fiber. Management criteria already favor conservation focused management of mature and old stands on these lands. The presence of old growth and mature stands within each landscape may or may not be an appropriate goal or maybe the percentage of the landscape in this successional stage is different.

What if any, forest characteristics should a definition exclude?

Arbitrary numeric values simply do not have any place in a definition framework. Ages, diameters, heights etc…… These values are entirely subjective and simply not transferable across the myriad of forest types and ecological conditions. There is no scientific basis for establishing an "age" at which a stand becomes "more valuable" as old growth or mature. Similarly, there is no diameter at which a tree suddenly becomes venerable as "stately" or "majestic", which apparently are the attributes trying to be captured in an old growth definition.

Conclusion

Once again, we question the very basis of trying to conserve one successional stage over another. Why are old and mature stands any more valuable than young or stand initiation stages? There are just as many wildlife and invertebrate species that depend on young forest conditions as old. The concept of conservation of old growth and mature only stands on a scientifically or ecologically baseless human affection for big trees.

The misdirection of energy and resources towards this exercise is short sighted. There will likely be countless acres that could be characterized as old growth and mature lost to wildfire, insect and disease in the period of time it takes to define and inventory. Making a map will do nothing to conserve the current condition of these forests.

The risk to our forests is not human intervention, but rather the lack of. Logging is not a significant threat to this successional stage as nearly every acre of public land where timber management occurs already has protections in place to ensure this successional stage receives appropriate consideration. Most forest plans have objectives to return the landscape to a desired future condition with late successional stage forests appropriately represented. An argument could be easily made that the best way to conserve old and mature forests is though active management to reduce the likelihood of natural successional processes taking place, yet when ever this is proposed, it is opposed.

The purpose of the exercise is clear, it is intended to add yet another layer of restrictions to the very small percentage of public lands that are even subject to any level of active management and timber harvest. It is based on a non-scientific fear that humans are destroying the environment, while the reality is that mother nature is trying to offset the unintended consequences of the preservation mentality.

Directives like this usually result in “on the ground outcomes” that are exactly the opposite of intended effects. It is the role of the silviculturist, forester, ecologist and biologist to stand up for the ecological process and point out the error in trying to conserve – preserve old growth and mature forest as a long-term land use objective.

Thank you for the opportunity to comment and we look forward to continued participation and monitoring of this effort. Please do not hesitate to contact us for clarification or more information.

Sincerely,

Paul R. McKenzie
G.M – Vice President.