

Wednesday, January 17, 2024

Director
Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250-1124

Re: Old-Growth Forest Conditions Across the National Forest System

Comments are provided in response to Federal Register, Vol. 88, No. 243, December 20, 2023, Notice of Intent to prepare an EIS, 88042.

1. Executive Order 14072 issued April 22, 2022, Section 2(b) required an inventory of mature and old-growth forest conditions on National Forest System lands. In response to the E.O. existing forest inventories findings were consolidated in Forest Service, USDA publication FS-1215a dated April 2023, Titled *Mature and Old-Growth Forests: Definition Identification and Initial Inventory on Lands Managed by the Forest Service and BLM*.
 - a. FS-1215a, Appendix 1, Table 15 Southern Region 8 (R8) referenced Gaines et al. (1997) as the principal reference for R8 old-growth identification.
 - b. The Gaines et al. (1997) publication is used for the identification of merchantable timber.
 - c. Federal Register, Vol. 88, No. 243, December 20, 2023, 88043, identified past silviculture practices as having contributed to current vulnerabilities in the distribution, abundance, and resilience of old-growth stands.
 - d. The performance of an inventory emphasizing value over character is inconsistent with the proposed action's recognition that there are significant ecosystem and geographic differences requiring the development of geographically informed adaptive management strategies. Such strategies would require that these differences be captured within any inventory conducted for compliance with E.O. 14072, Section 2(b).
 - e. FS-1215a recognizes that quantitative measurement criteria for a working definition of mature and old-growth forests would eventually be refined over time. Such a recognition implies that the various regional inventories compiled in response to E.O. 14072, Section 2(b) are potentially deficient. That the techniques and refinements necessary to accurately identify and inventory mature and old-growth stands were absent in the compiled inventories presented in FS-1215a.
 - f. E.O. 14072 was issued in 2022. The Arkansas R8 inventory was performed between 2017-2021. To compound the issue, FS-1215a, Appendix 3, Table 20 reveals that all USDA Forest Service inventories predate the E.O.
 - g. The Forest Service, USDA is pursuing a structural characteristics approach. An approach that emphasizes mature forest development preceding old-growth development over that of silviculture.
 - h. Recommend that the original inventory conducted for R8 be revisited, and that a new E.O. 14072 Section 2(b) compliant inventory be conducted for Arkansas (State Code 5). That the following additional references be consulted in assessing a stands structural characteristic and a stand's potential to transition from mature to old-growth:

- i.* Journey, David H.; Stahle, David W. 2004, Old-Growth Wooded Pasture in the Ozarks. Gen. Tech. Rep. SRS-73. Ashville, NC: USDA, Forest Service, Southern Research Station. Pages. 42-52. Reference is holistic in its approach capturing:
 - a)* Geology and Soils conditions,
 - b)* Historic land office records of pre-settlement forest conditions,
 - c)* Native American prehistoric archeology. The study of which would aide in the establishment of Indigenous Knowledge and leadership in the proactive stewardship and furtherance of old-growth forest conditions on National Forest System lands in Arkansas.
 - d)* Historic archeology, and
 - e)* Dendrochronology studies.
 - ii.* David L. White and F. Thomas Lloyd. 1994. Defining Old-Growth: Implications for Management. Paper was presented at the Eighth Biennial Southern Silviculture Research Conference, Auburn, AL Nov. 1-3, 1994.
 - iii.* Recommendation is consistent and within the scoping process as provided in Federal Register, Vol. 88, No. 243, December 20, 2023, Notice, 88046.
- 2. Request that Executive Order 14072, Section 2(c) objectives be broadened to encompass other adjoining federal lands besides those held by BLM. Specifically, that the National Park Service, U.S. Dept. of the Interior be invited to participate and to include the Buffalo National River, Arkansas in the proposed NEPA action. The Buffalo National River is adjacent to the Ozark St. Francis National Forest. The incorporation of a Buffalo National River E.O. Section 2(b) timber inventory into the proposed NEPA action could further:
 - a.* The preservation of mature and old-growth forest stands located within the Ozark St. Francis to include those stands which extend onto the Buffalo National River Park lands.
 - b.* Contribution to a desired nature-based climate solution via carbon storage.
 - c.* The promotion of local biodiversity.
 - d.* The promotion of sustainable local economic development, which is dependent upon a healthy and unspoiled ecosystem. Federal Register, Vol. 88, No. 243, December 20, 2023, Notice, 88044, identifies that one of the stated purposes of the proposed action is to protect old-growth from encroachment pressures resulting from urban development. Incorporating the Buffalo National River into the proposed NEPA action would assist in fostering ecologically appropriate management across both the Ozark St. Francis National Forest and the Buffalo River.
 - e.* Request is consistent and within the scoping process as provided in Federal Register, Vol. 88, No. 243, December 20, 2023, Notice, 88046.

Sincerely,

Dave Brown

David Brown
Public Comment Contributor

Referenced sources **1.h.i.**, **1.h.ii.**, and **FS-1215a** are included with this submittal.