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RE: Comments on Executive Order 14072: Strengthening the Nation's Forests, Communities, and Local Economies

As the United States Department of Agriculture (USDA) and Department of Interior (DOI) moves forward with the defining old-growth and mature forests on federal lands, in response to the Executive Order (E.O.) 14072: Strengthening the Nation's Forests, Communities, and Local Economies, the Wyoming State Forestry Division (WSFD) would like to take this opportunity to provide some thoughts on the development of the definition. We have focused our thoughts on the four questions proposed for input from the USDA Forest Service and Bureau of Land Management, DOI.

We recognize the challenge of defining mature and old-growth forests on federal lands to be a very daunting task as forests across the United States vary widely in species, growth, fire regimes, and overall structural densities. Even in Wyoming, we have incredibly diverse forests we manage from ponderosa pine in the Black Hills, to the high elevation forests that contain either a monoculture of lodgepole pine to a mix of conifer species, down to the riparian bottomlands that are just as critical to our wildlife and communities. We recommend your definition is able to capture the variety and diversity within all of these forests.

Wyoming contains only about 16 percent forestlands within the state, but that does equal to a forest area of approximately 10.5 million acres, which produces merchantable timber, clean water, and recreational opportunities. About 80 percent of the forestlands in Wyoming is owned by federal agencies, with the US Forest Service administering the majority of the federal forestlands at roughly 69 percent. Defining and then creating management decisions for mature and old-growth forests on federal lands will have a significant impact to tribal, state, and private forestlands and communities in Wyoming. We recommend the definitions being created allow for flexible and adaptive management outcomes that will ensure forest lands across all of Wyoming thrive into the future.

Mature or old-growth forested stands characteristics are dependent on multiple attributes that are also contingent on current and past management activities. Stand structure, age, fire regime intervals, and forest composition can all be important aspects to characterizing if a stand is mature or old-growth. These characteristics are also based on a time frame that has allowed or not allowed the disturbance needed to maintain the qualities of a forest. A durable definition needs to include acknowledgement of the time frame needed to allow for disturbance (that could or could not be controlled by humans) to maintain or to be excluded. This time frame could or could not be in a human's lifetime.

As for any suggested characteristics recommended to be excluded from the definition, we recommend not attaching any specific limiting definitions, such as associating certain wildlife species to mature or old-growth forests. Additional limiting language can result in future management challenges that we may not be aware of at this time. The science of forests and forestry is ever-evolving and we request any definition not contain limiting language within it.

Again, thank you for the opportunity to comment on E.O. 14072: Strengthening the Nation's Forests, Communities, and Local Economies. The Wyoming State Forestry Division looks forward to working with the US Forest Service and the Bureau of Land Management as the mature and old-growth definitions become finalized.

Sincerely;

Bill Crapser

State Forester