

Data Submitted (UTC 11): 8/19/2022 4:00:00 AM

First name: Ronald

Last name: Hamilton

Organization:

Title:

Comments: To:

Christopher French, Deputy Chief National Forest Systems, Forest Service

Tracey Stone-Manning, Director Bureau of Land Management

Subject:

Input Response to Request for Information on Federal Old Growth and Mature Forests.

I am responding to the Request for Information on Federal Old Growth and Mature Forests that was triggered by President Biden's 2022 Earth Day Executive Order 14072. An order that will probably last about the same amount of time as President Trump's Executive Orders did when the President Biden was inaugurated. This effort is both fool hardy and a significant waste of many people's time and energy. I have been in the position as a former Forest Service employee of performing a very similar task over several months. This was for a regional area that is substantially smaller and less diverse than the scope of this directive. I did this because other Forest Service Regions adjacent to the Intermountain Region were developing "old growth" definitions that simply were not at all comparable with similar forest ecotypes found in our area. Later on, in another job assignment, on the Payette National Forest, I found that my developed definitions within the Region did not fit the Forest criterial needs because other ecological factors were added to the critical factors changing the criteria and hence the definitions. The added factors were important as they were linked to factors such as wildlife and geomorphology. This definition exists today in the Payette National Forest Plan.

As a graduate forester, silviculturist with more than 40 years of field experience in the Pacific Northwest and Intermountain in several forest management positions I find the RIF very hard to respond to. Just being familiar the heterogeneity of the landscape and the forests that are found in these mountainous areas is pretty overwhelming. You see when working on some parts of the Salmon NF I found that Douglas-fir near where Lewis & Clark crossed the continental divide were very old, 200 plus years, and had survived several wildfires but were only 14 inches in diameter. Yet straight west near the confluence of the Salmon and Snake Rivers the same species trees, that age and surviving several fires could be 36 to 44 inches in diameter and several feet taller. These would be "old growth" in most senses of the word but strikingly different, so could people make a similar mistaken judgement dealing with coastal variety of Douglas-fir? Ecosystem wise these trees are the surviving trees of the widely variable periodic fires that occur in these forest systems. This is why the developing a "universal" definition is simply a "fool's errand". Forest Plans required under several laws will develop the appropriate definitions and standards for the kinds of trees that are appropriate in the restoration form of forestry that are being applied on federal lands, where mechanical treatments and forest management for timber as a resource is allowed.

The problem is that much of the federal forest lands are in some form of preservation or protection status that does not allow the mechanical harvest of timber. For example the Payette National Forest of 2.3 million acres has 35% of it in protected Wilderness and another 38% in protections of Idaho Roadless Area. Other protective status excludes more, so only 22% of that National Forest is even subject to mechanical harvest allowing forest management to occur. This pretty much reflects the status of much of the National Forest lands located in the western United States. This is another reason that developing a definition for "old growth and mature" forests is a futile task. Especially, since I am very aware that the agency lacks sufficient staffing to carry out that management while dealing with the inherent problems that come with dealing with the National Environmental

Policy Act. This is especially true because currently new legislation adds more redundancy to laws while not allowing the use of allowed "Categorical Exclusions" allowed under NEPA. Very poor policy development that adds critical time to treatments that should be made with much greater haste.

The Forest Service and the BLM, the Nation's largest agencies responsible for the management of the forest lands SHOULD NOT have to develop the numerous forests, types, successional stages definitions. These are arduous, inappropriate steps that as I expressed earlier have numerous definitions that have various purposes defined, usually in the Forest Management Plan. It seems that this means that the agencies will have a "Biden" definition whose entire purpose is to develop another avenue for the litigators of projects to delay and or derail work that might avoid the impact of wildfires. On just the Payette National Forest the Forest Management Plan identifies eleven potential vegetation groups that has some compatibility with the adjacent Boise N F simply because they developed their plans together so many of the other ecological factors that influence a definition were included. Those factors are very variable hence definitions would vary. For that reason it is very unscientific to develop a single definition that has little utility other than making a political statement.

The National Forest lands that have been placed in Wilderness, or Roadless Area status are the lands that are primarily being "managed" by wildfire or rarely by prescribed fire. This is based entirely on the restrictions placed by the rules or laws at their establishment. Unfortunately to meet the National Environmental Policy Act requirements it often takes 3 to 5 years to get a project to the decision phase and then it often takes 2 to 5 more years for some projects to get through the litigation phase before work to reduce fire hazard can actually occur on the lands actively managed for "restoration". Adding another definitional impediment like old growth or mature trees would be another assurance that litigation would occur with greater delays. At this time many forests proposed for management actions are being burned by wildfire BEFORE that can occur and the whole NEPA process starts over. Most people believe large projects in forest lands are nearly impossible to get accomplished yet that is the pace and scale necessary for the agency to meet the forest restoration goals needed, just on lands that can be mechanically treated. Many land areas on some of the National Forests cannot be treated mechanically because the equipment cannot be safely operate, and these areas are allowed to be burned, by wildfire or prescribed fire.

It is often the treatment of the landscape by mechanical or prescribed that allows the retention of large trees that people refer to as old growth. For that reason it is not reasonable to add additional unnecessary constraints to the already difficult task of managing our federal forest lands. Lands that provide so much to the economy and strength of this country. These same lands that actively sequester carbon and provide so many other services and opportunities.

It is important to understand the risks that come with aging forests that are not managed. Many insects and diseases become more prevalent in many species in many ecosystems acting as the ecotype perturbation element that pre-stages these effectors and are very detrimental in the use of these systems as carbon sequestrations or sinks. These perturbing influences are very active in our western forests many of the insects and diseases are sourced from lands that are difficult to manage or have management restrictions. It is important to weight the actual sequestration from various types of management scenarios if carbon is management element.

If there was a definition developed and the agencies were required to inventory for "old growth or mature" elements this is a very difficult task. The agencies have cycle of inventory which is costly, time consuming and requires well trained and capable personnel. Adding attributes may alters the statistical significance of the inventory elements, which likely will add significant costs, time and personnel effort. This seems to be a very large waste of time and personnel that the agency doesn't have and has little chance of retaining them. This is direct conflict with the needs of pace and scale that agency identifies as a problem in accomplishing the restoration treatments that are currently lagging on all lands while wildfire effects more lands.

It has been the active management on the lands that have saved redwoods and other conifers that will probably be hindered by this project by the Biden administration. Altering structure and removing hazardous stand structures in the forest will go a long way toward saving mature and old growth stands and as well as unique forest situations. Actual accomplishment rather than some day dream by groups more interested in stopping mechanical treatments than in reaching other noble goals they espouse.

I can't stress to you enough how unscientific and nearly worthless the project of development of definitions and inventory of old growth and mature forests would be and how it doesn't fit with existing laws, rules and procedures. There are far better projects to spend our money and human resources on, at this time. Emphasis on accomplishment of management and other techniques for dealing with Climate would be a more appropriate effort would have much more reaching results.

Thank you for accepting my comments.