

Data Submitted (UTC 11): 8/23/2022 4:00:00 AM

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Comments: Contributions to Old-Growth Definition Framework[mdash]for USDA Forest Service and USDI BLM EO 14072: Strengthening the Nation's Forests, Communities, and Local Economies State of Idaho[mdash]Idaho Department of Lands

General Comments:

\* We can't truly go back to "historic" disturbance regimes[mdash]and now, in the West, we're becoming successful at working collaboratively across forest ownership boundaries to reduce the catastrophic outcomes of fires that are fueled by many years of "enabled" build-up of forest fuels and forest health-suppressing stem densities.

\* Having uniform definitions forests that would lead to preservation of current forest conditions could completely contradict the forward movement we've achieved to treat more acres of national forests for fuels-reduction and forest-health improvement.

\* Structural attributes of forest-stand stages are, for the most part, theoretical[mdash]and can be manipulated to achieve the landowner's management objectives most efficiently[mdash]or to reach politically based goals in managing our public forestlands.

1. Criteria needed in definition of mature and old-growth forests

\* Criteria in definition of old-growth forests:

\* Definitions must include region-specific stand characteristics.

\* Each forest type or system needs its own unique attributes assigned.

\* Characteristics in definitions must be measurable and observable.

\* Characteristics in definitions should be grounded in silvicultural science and disturbance/fire ecology.

\* Characteristics in definitions must be existing, or achievable, in today's post-fire-suppression forests.

\* Exemptive clauses must be included to recognize the burgeoning WUI[mdash]and to prioritize the saving of life and personal property in old-growth forested areas that pose a high threat of wildfire to communities.

2. Overarching characteristics of mature and old-growth forests

\* Overarching characteristics of old-growth forests:

\* Age distribution

\* Lack of evidence of stand-reinitiating disturbances since first cohort was established

\* Stand-structure attributes showing distinct spatial patterns of multiple age classes[mdash]regardless of the presence of individual old "legacy" trees

\* Stem-size and species variety and proportion (stand structure):

- \* Late seral species stem distribution and variety
- \* Presence of canopy gaps
- \* Variation of live tree heights and diameters
- \* Multiple succession of cohorts in upper canopy levels

\* Stem frequency and spatial arrangement of snags and downed woody debris

3. Definition components reflecting disturbance-based changes forest-composition changes:

4. Definition components that are durable:

5. Forest characteristics that should be excluded from mature and old-growth forest definitions:

- \* Any metrics that are consistently/uniformly used from one stand or forest type to the next
- \* Minimum, maximum or exact ages for any canopy layer, cohort or age class
- \* Minimum, maximum or exact ranges of stem sizes