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Title: Vice President - Public Resources

Comments: August 28, 2022

Mr. Jamie Barbour

Assistant Director

Ecosystem Management Coordination

USDA Forest Service

Washington, DC:

Dear Mr. Barbour:

Following are comments from California Forestry Association (Calforests) responding to Fed. Reg. 42493-42494 Vol. 87, No. 135 July 15, 2022, "Request for Information (RFI) on Federal Old-growth and Mature Forests."

In accordance with Executive Order 14072, issued April 22, 2022:

"The Secretary of the Interior, with respect to public lands managed by the Bureau of Land Management, and the Secretary of Agriculture, with respect to National Forest System lands, shall, within 1 year of the date of this order, define, identify, and complete an inventory of old-growth and mature forests on Federal lands, accounting for regional and ecological variations, as appropriate, and shall make such inventory publicly available."

Calforests incorporates Federal Forest Resources Coalition's (FFRC) August 25, 2022, comments in their entirety. Calforests will not repeat any of FFRC's comments in Calforests comments. Rather, Calforests comments are focused entirely on a pathway for the Bureau of Land Management (BLM) and the Secretary of Agriculture, with respect to National Forest System lands, to complete an inventory, including accounting for regional and ecological variations, by April 22, 2023, as required by the Executive Order.

Calforests believes and the Dept. of Agriculture, Forest Service only have the statistically valid Forest Inventory and Analysis (FIA) data to be the driver to complete this inventory by April 22, 2023. Fortunately, FIA is robust in the information that is gathered at each permanent plot every 5-10 years. Further, the FIA is by species by region and therefore provides for regional and ecological variation.

FIA can provide age by species in 20-year increments, species diameter in 3" increments, species mean crown density . . . It is a robust dataset that can accommodate a range of definitions to explore for mature trees and old growth.

Further, FIA could provide data by National Forest. In other words, if data was desired at a scale smaller than a "region," FIA can do that. In Region 5, when FIA California's Forest Resources, 2001-2005 (PNW GTR-763) was published, the Region selected the permanent plots within the boundary of each National Forest and reran all the area and volume tables. That provided the FIA data for each National Forest, which continues to be extremely useful. The set of tables was known as the Westcore Data Tables. Unfortunately, the exercise has not been repeated since, even though it could have been done with the 2010 and 2015 FIA plot data for California.

Calforests believes the biggest issue with using FIA as the inventory data source is that there are not enough FIA analysts to take on the task. At least one journey level analyst would have to be added to each of the FIA staff by Region. Perhaps there are contractors that could assist.

In conclusion, Calforests hopes you find this information useful as you explore how to complete the inventory, including regional and ecological variations, with less than eight months left to the due date of April 22, 2023.

Sincerely,

STEVEN A. BRINK

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