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Organization: Jerome Natural Resource Consultants

Title: President

Comments: Dear Mr. Barbour, Jerome Natural Resource Consultants (JNRC) is a small independent forest consulting firm of which I am the president. We have been in business for about 25 years and provide general forest consulting services to private landowners. I also worked 15 years for the U.S. Forest Service early in my career as well as for the Oregon Department of Forestry for a couple of years. Another 15 years has been spent working as a consultant with the forest products industry in Oregon both as a forester for sawmills and as a consultant. My work has been primarily in the private and public forests of eastern and central Oregon and my accumulated 40 years of experience is significant. Forests and landscape ecology take place over long periods of time which is an extremely difficult concept for humans in general to both understand and accept. Put another way, we simply don't live long enough. As I tell private landowners "forestry is not like a wire transfer or sending a text or an email, it takes place over centuries." Throughout eastern and central Oregon, private landowners depend on what little milling infrastructure is left to sell their logs to create some income and help pay for forest management and fuels reduction. ALL of these mills, without exception, are dependent on raw materials off the National Forest System to help keep them operating. The loss of more mills due to insufficient raw materials from Federal land will add to the huge fuel loads on private land because landowners will not be able to find markets within an economically viable distance to sell their logs. Recently President Biden issued an executive order stating that the Secretaries of Interior and Agriculture shall "...within one 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." I would like to submit the following comments on behalf of JNRC:- Climate Change is important and our National Forests are critical in helping the United States adapt to climate change - BUT they must be allowed to do so. Preserving the current state of the forests by including protections for trees that may not adapt to climate change is the wrong strategy to undertake. We must manage these forests to reduce the impact of climate change, re-forest the areas damaged by mega-fires and ensure that we are continuing to capture carbon through new growth while ensuring that carbon is sequestered in forest growth and sustainably harvested wood products.- It is important to ensure that this endeavor does not impede the implementation of the 10-year wildfire strategy. Wildfire is a major threat to all ecosystems, and I am concerned that this effort will redirect valuable resources away from the implementation and mitigation planning for the mega-fires that have plagued the west. These wildfires do incredible damage to valuable ecosystems, habitats, communities, and at-risk populations. The current situation of our national forests is dire and desperately needs to be addressed in a manner that will truly effect change by reducing fuels and overstocked stands without more regulations, guidelines, policies and other stumbling blocks that limit the ability to create a resilient, healthy landscape.- Under no circumstances is it scientifically correct to determine old and mature trees through the usage of a diameter. The various tree species grow under multiple different circumstances, both external and internal and have different growth rates. In the mid-1990s, the Forest Service amended multiple forest plans on the Eastside of Region 6, known as the Eastside Screens Amendment which limited the removal of trees that were 21" in diameter. This temporary EA was in use for 35 years and had a catastrophic effect on the national forests and local communities. These already overcrowded forests (due to fire suppression) now had additional management restrictions that impeded the ability of the trained land managers to truly treat a stand and ensure that it remained healthy and resilient. Lack of management has led to undesirable tree species moving into sites and where more appropriate species can no longer effectively compete for site resources. As a result, over 75% of the Wallowa-Whitman, Umatilla, and Malheur National forests are so overcrowded that they are at a moderate to high risk for uncharacteristic (stand-replacing) fire. In endeavoring to save old and mature trees in this area, the Forest Service was painted into a corner and as a result these forests are in worse condition and when wildfire comes, the effort to save old growth will be for naught.- Under no circumstances should the agencies implement any management rules regarding old growth. Any rule protecting old growth will restrict the ability of the agencies to properly manage and reduce fuel loads on the national forest system. There are sites where saving old growth is NOT appropriate. One size fits all does not

work in land management. The major threat to our National Forest System is wildfire and removing any ability to reduce fuels or requiring extra analysis to manage old or mature trees will provide fodder for radical environmental groups for litigation.- At this time, only 26% of the entirety of the National Forest System is available for active management leaving at least 74% in a passively managed system. If we are truly concerned about maintaining old and mature trees across the landscape, we need to open some of these areas to reduce fire danger and create a heterogeneity and ensure enough fragmentation of our landscape to reduce the carrying of stand-replacing fires.- There are over 58 million acres of the National Forest System that are in need of restoration/management and this effort is diverting the limited workforce away from doing this meaningful work to develop a definition for old growth that will have little to no impact on the actual needs of the forest.- I'm concerned that this is being done from the top down, the people who have the required expertise to develop an implementable framework are those who work on the affected landscape. Their level of local and indigenous knowledge will allow them to adaptively manage these landscapes to ensure continuity of these forested landscapes and old and mature trees as well as the multiple other structural stages needed for wildlife habitat, water storage, and recreational values.- Old growth planning and conservation should be done at the forest planning level based on the local ecosystems, forest needs, and disturbance risks. The forests must have a forest plan and all discussion of old growth inventory and conservation efforts should happen at this level. The agencies risk these planning efforts by taking on a national level exercise that may contradict the current forest plans or require these forests to undertake new planning efforts to develop old growth definitions.- It is important to recognize the diversity within the forest system. We must learn to balance forest structural stages and adapt to climate change through forest stewardship that ensures multiple cohorts, structural stages and structural stages and increase heterogeneity within the system so these forests can adapt and be resilient to disturbances such as wildfire, insects and disease.- I'm concerned about the resources being diverted away from the 10 year wildfire strategy to develop this framework and inventory. The 10 year wildfire strategy is incredibly important to the West as we suffer through mega-fire after mega-fire that we implement this strategy. Adding an old growth definition and diverting resources is very problematic.

JNRC response to requested input:

- [bull] "What criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for planning and adaptive management?"
- [bull] "What are the overarching old-growth and mature forest characteristics that belong in a definition framework?"

o Due to the variations of ecology, species, and geographies, it is an impossible and unscientific task to develop a single definition of old-growth that applies to these diverse ecologies. As the Forest Service and BLM (here after agencies) move towards developing these universal frameworks, it will be important to utilize local and indigenous knowledge while incorporating adaptive management in understanding what constitutes old growth and mature trees across the United States.

- o The criteria should be regionally/locally developed and should be based on structural stages, soils, ecotypes within each of the areas. Structural stages are the best way to evaluate the complexity of the national forest system as it allows for heterogeneity within each stage and doesn't require an intense review of every tree within the NF system.
- o The criteria should allow for adaptation at the local level to ensure that land managers are able to properly implement the 10 year wildfire strategy to reduce wildfire risk across federal lands.
- o The criteria should recognize that old growth characteristics vary by forest type, location, growing conditions and management history and should not impede the agency's ability to meet desired future conditions for the area at a landscape scale.
- o The criteria should acknowledge the variation in ecosystems, growing conditions, structural stages, morphological characteristics, tree-release rates, site growth constraints, historical range of species, and adaptation to climate change.

[bull] What, if any, forest characteristics should a definition exclude?

- o The criteria or framework for old and mature forests should NOT include:

- * Tree size/diameter limits
- * Age requirements
- * Species preferences/requirements by species
- * Stocking levels or other requirements such as trees per acre

- o The criteria or framework should not place old growth over other equally important structural stages within the forest system. These structural stages are important habitat for various wildlife and other diverse species, ecological functions (such snow and water storage) and economic returns to local rural communities.

[bull] How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site

productivity and geographic region?o There may be a need to determine multiple different frameworks across the regions help local units determine criteria for old and mature trees. These frameworks will have to incorporate the disturbances and variations within forest types/compositions, climate, site productivity, geographic regions and current conditions.o These frameworks will need to account for the current conditions on the landscapes and allow for management to return these landscapes to a healthy, resilient, sustainably managed and diverse landscapes that allow for multiple use.o Any framework must allow flexibility to ensure that the local land managers are able to fully restore and sustainably manage areas where management is still allowed.[bull] How can a definition be durable but also accommodate and reflect changes in climate and forest composition?o In order to be durable, it will need to ensure that it does not impede efforts to reduce fire danger, increase sustainable harvest, or require extensive planning efforts. If the framework impedes any of these efforts, it should not be developed or implemented. A durable definition will be adaptive to climate change, ecological, social and economic needs of local communities and provide assurance that the Forest Service is meeting all other obligations. It should also not impede planning efforts both on a project level and a forest planning level.[bull] Inventorying old-growth and mature forests on Federal landso This inventory should NOT be done on a tree by tree basis. The agencies are already short-handed and diverting resources to inventory, analyze and ground-truth the information. Any inventory must be done at a stand level as defined by a credible source outside of the agency, such as Society of American Foresters (SAF). The SAF defines the stand as "a contiguous group of trees sufficiently uniform in age-class distribution, composition, and structure, and growing on a site of sufficiently uniform quality, to be a distinguishable and management unit."o Since the Forest Inventory Analysis (FIA) plots are already established it makes sense to hire contractors to re-inventory these plots across the nation and determine what is actually on the ground. Contractors are far more nimble and rapid than the government and this strategy would expedite availability of information.Thank you for taking the time to review my comments on the Request for Information regarding the definition and inventory of old growth. I believe that this effort will have a negative effect on the overall management of the National Forest system, reduce the ability of the agencies to scientifically manage the national forest and is an unrealistic effort that will further reduce our ability to ensure a resilient, healthy national forest system. By undertaking this effort, the Forest Service and BLM are undermining the effort to implement the 10 year wildfire strategy that will have a meaningful effect on reducing the catastrophic impacts of mega-fires, increasing forest resiliency, and beneficially impacting rural communities.Sincerely,Irene JeromePresidentJerome Natural Resource Consultantsijeromejnc@gmail.com