

Data Submitted (UTC 11): 8/30/2022 4:00:00 AM

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Comments: My comments on the proposed federal project definition of "Federal Old Growth & Mature Forests" for USDA Forest Service & Dept. of Interior BLM. Dated August 30, 2022.

Submitted by;

Joel A. Nelson

My name is Joel Nelson, and I am a retired professional forester. of 47 years, who lives in Kalispell, Montana. This is a very difficult task to try to create and define a single definition of an old growth that applies to the many diverse forests and timberland types across the continental United States. To try to create a definition of one size fits all is an impossible task for the USFS and BLM federal land management organizations. The definition of old growth or mature forests would have to be so general in nature that it would be a useless guideline for federal land management across the United States. It would also be a wide-open pathway for continual arbitrary litigation and stalemate. Forests of the United States are very complicated, diverse and dynamic for using one absolute definition of old growth, and defined application. What is old growth, with one forest type or geographic location, would be much different than another forest type or location. Diversity and the dynamics of deciduous forests vs. conifer forests, a forest's geographic location, coastal vs. inland vs. boreal vs. high elevation, soil types, elevation, aspect, length of growing seasons, stand fire history, management treatment history, habitat types and climax species. Each forest or stand is diverse and dynamic. To define old growth arbitrarily based on size, age or tree diameter limits is impossible due to stand variability. I feel we do not need more arbitrary based federal policies for the management of our federal lands. We have enough of those problems now, with our federal land management guidelines or lack thereof for any productive forest management. Politics and continual legal litigation do very little to help good professional and scientific based forest management. Defining old growth arbitrarily and applying the guidelines universally will only hinder or restrain good active forest management. In forest management, federal agencies and professional foresters need flexibility to manage different forest types, forest sites, and tree species. Dry fire prone sites require different management treatments than cool coastal sites, boreal or high elevation sites. A limited old growth definition and management regulation of or by federal agencies, based on one definition and more red tape limitations are, I feel, creating recipes for future disasters and disastrous management outcomes with our national forests. Be it overstocked stands of both seral and climax tree species or vegetation in fire prone inland forests that result in catastrophic wildfires, which usually means less old growth created on the forest landscapes for natural regeneration after a wildfire. Or we promote other mortality issues such as insect and disease, and general stand mortality which does not promote good forest health or continued forest viability. Let's not limit our management tools and options with narrowly focused guidelines, or by more red tape and regulations. Instead give our federal agencies and professional land managers broader and more flexible guidelines to manage our national forests and their valuable natural resources. We need to retain our land management tools and our many options. Proposals like this one on defining old growth may be well intended, but instead can be restraining and impossible to attain the desired or required outcomes. Because the definition guideline is absolute, it can become an open door for legal litigation and absolute interruption. One size will and must fit all. I feel this is not a good situation or a good situation to be put into for good active forest management! Our federal land management agencies need to be accelerating and proactively managing our national forests to provide for society's wood product needs. In addition, we need to continue to provide other resource amenities through active forest management, such as; healthy/fire resilient forests, clean water, clean air quality, carbon sequestration wildlife and fish habitat, recreational opportunities, new regenerated replacement forests and sustainable healthy dynamic forests. All of these outcomes are very important to our world, lives, society and our overall health, both for society and our world. Our national forests are dynamic and complex. Their functions and outputs are important to the wellbeing of all of us and our future.

To limit our forest management options or to walk away from active public land forest management under today's ever changing climatic conditions would be a very big mistake, We need to be actively managing and working in all of our nation's forests to reduce the Increasing catastrophic fire risk due to, overstocking, drought, disease and insect mortality in our nation's forests. Active forest management and the ability to use all of our professional knowledge and management tools is very important to the world we live in today and into the future, with our healthy viable forests. Thank you for the opportunity to comment on this proposed federal action plan.