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First name: Steve

Last name: Cole

Organization:

Title:

Comments: Old-growth forests have been studied extensively here in the Pacific Northwest since the 1980s so I cannot think of a better criteria and definition than what was developed during the development of the Northwest Forest Plan: a multilayered, multispecies canopy dominated by large overstory trees, some with broken tops and other indications of old and decaying wood; numerous large snags; and heavy accumulations of wood, including large logs on the ground.

While this definition works well in the Pacific Northwest, it likely does not translate well into other regions of the country. For example, forests in New England have a higher density of deciduous trees compared to conifers. So should the Forest Service pursue a "one size fits all" definition for mature and old-growth forests? I believe the answer is no. Instead, I would advocate for regionally based definitions & criteria so that forest aspects that are unique to each region are identified and included so that they may be preserved.

The Forest Service manages and administers the nation's forests through a series of regions (Region 5, Region 6, etc) and so my suggestion is to develop and map old-growth forests based on those region areas. To be honest, I find the issue of defining and mapping old-growth to be a far easier task than what comes afterwards- what do we do with this information once it is "mapped?"

The public information session on July 21st indicated that remote sensing and satellite imagery would likely be the inputs for this mapping exercise. Again, here in the Pacific Northwest, Region 6 has already been doing this. The LEMMA (Landscape Ecology, Modeling, Mapping, and Analysis) team at Oregon State has been processing remote sensing imagery using the Gradient Nearest Neighbor (GNN) method to map forest species and structure (<https://lemma.forestry.oregonstate.edu/data>).

In the 1990s, many National Forests had stand age datasets based on combining data plot information with aerial photo interpretation. Today (at least within Region 6) the Forest Service looks at these GNN datasets first and then follows up with field visits to determine stand age. This highlights the crux of my concern- once the Forest Service and BLM have this dataset at their disposal, what are the guidelines and caveats about its use?

As someone working to save old-growth forests, I have used GNN data with my comments to challenge the Forest Service about specific locations of projects. These comments tend to be discounted by Forest Service due to how GNN data is developed and its source. I see this to be the same issue and challenge with this new endeavor. How will the Forest Service respond when this new dataset is presented back at them to challenge assertions made with projects? Will the Forest Service accept this data as true and accurate or will it discount it?

If the Forest Service is going to discount its use at the project level, then what was the point of this exercise? A year will be wasted and forests will be cut for no good reason. I urge the Forest Service to dedicate an adequate amount of time to address the inevitable questions and concerns about the data use once it is published. I guarantee you that myself and countless others will be waiting to download and use this information to challenge future projects.

Thank you,
Steve Cole
Everett, WA