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Mr. Jamie Barbour

Assistant Director

Ecosystem Management Coordinator

USDA Forest Service

Washington D.C.

RE: Request for Information (RFI) on Federal Old-Growth and Mature Forests, 87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185

<https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239>

Dear Mr. Barbour

Executive Order (E.O.) 14072: Strengthening the Nation's Forests, Communities, and local Economies, seeks to define a single definition for mature and old-growth forests on a national scale. While we see this as an ill-conceived, impossible task that cannot include the best current relevant science, we also believe serial litigants and anti-forestry groups will seize this opportunity to advance their agenda to further restrict sound science based active forest management, therefore obligating us to provide some common-sense input we hope will help you accomplish the task of defining, identifying, and inventorying old-growth at the appropriate agency level. In response to the USDA Forest Service, Bureau of Land Management, and DOI, Request for Information (RFI) on Federal Old-growth and Mature Forests, the Mineral County Commissioners provide the following input for your consideration.

? "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?"

Old-growth and mature forests cannot and should not be combined in a single definition. While old-growth forests are certainly in a state of maturity, mature forests in most cases should not be considered old-growth. Due to the lack of active management on our federal forest lands, millions of acres of forests have become overstocked and are prematurely reaching a state of maturity. Succumbing to the effects of these overstocked conditions, competing for a limited supply of water, and dealing with the ensuing effects of insects and disease, trees that might otherwise live to be hundreds of years old are reaching maturity much earlier. These overstocked mature forest conditions are the reason we are dealing with uncharacteristic catastrophic wildfires today.

A definition for mature forests is different today than it would have been in years past and will no doubt be different in the future. Through active forest management, forests in the past, reached maturity (culmination) while they were in a healthy state and could remain in that state for years. Today, the definition for mature forests is a stage in forest stand progression when forests are dying at a substantially higher rate than they are growing. Insect, disease, and fire dominate the landscape and trees are no longer able to fight off the effects of these agents. In many cases, wildfires are burning so intensively that forest are not regenerating naturally. The work to define and inventory mature forests, has in a large part already been done. Multiple state and federal analysis based on the best available science have already been completed with extensive mapping identifying what and where these mature and over mature forests are located. Utilizing this data and mapping tools and following the Biden Administration and Chief Randy Moore's goal of dramatically increasing the pace and scale of science based active forest management by up to four times current treatment levels in the West will fulfill the request to define mature forests and should be used for planning and adaptive management.

Defining old growth even at the forest level is controversial, any attempt to write a universal definition that can be

applied at a national level will only lead to conflicts between stakeholders and litigation in the courtroom. Old growth is already defined within the forest plans. Even older forest plans have or are being amended to adopt the most relevant current science, many of them several times over. The agency should avoid arbitrary limits such as tree size, age classifications, diameters, or acre size. These mandates are not science based and do not recognize forest health issues. They tie the hands of our trained forestry professionals and block good science based active forest management and expose forests (including old growth) to the effects of insects, disease, and wildfire.

The agencies should avoid the impossible and unscientific task of developing a universal definition for old growth that would be applied across the United States and rely on definitions in existing forest plans. In no case should we attempt to define old growth on a landscape any larger than a region. In no case could there be a universal science-based definition that would define any forest attributes across so many different diverse forests and forest types across the entire United States.

? "What are the overarching old growth and mature forest characteristics that belong in a definition framework?"

First, we do not support a definition that would combine old growth and mature forests. Old growth forest characteristics may differ dramatically even within a forest but certainly at a national level. Old mature forests are simply by definition the primary characteristic required to be considered old growth. Other characteristics would depend greatly on the widely different forest type, tree species, sizes, characteristics, and most importantly, the need. Depending on the need, old growth definitions and characteristics may serve a broad range of different attributes or be as narrow as providing habitat for a single tree of wildlife species. Old growth characteristics would best be identified at the project level but certainly no larger landscape area than the forest level.

The definition framework and characteristics that define old growth should be left in the able hands of our local forestry professionals at the forest and regional levels. Old growth should be delineated at the stand level based on the forest composition and structure during project area planning.

? "How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site productivity and geographic region?"

Due to the dynamic nature of stand progression, forest stands (including old growth) are not in a static state, constantly moving from one succession state to another. Healthy old growth and mature forest stands will move into respective seral stage successions quicker and remain in each stage for a longer period of time. Many stands characterized as old growth today are at serious risk of destruction from catastrophic wildfires. These stands must be actively managed to maintain their old growth status.

A definition can only reflect changes based on disturbance and other variations by placing management decisions firmly in the hands of our local forestry professionals to address these changes at the stand level during project development.

? "How can a definition be durable but also accommodate and reflect changes in climate and forest composition?"

First, any definition of old growth or mature forests we develop today must recognize the critical need to address the current forest health crisis we face today. It must not be based on today's forest conditions. While acknowledging these conditions and recognizing the need for change, the definition can only be durable if it is based on our vision for the future which should be, healthy forest stands in all seral stages.

? "What, if any, forest characteristics should a definition exclude?"

The definition should not assume that forest characteristics are compatible across a landscape any larger than a forest or possibly a region. It should not include any reference to tree size, age, stand density, or stand size. The definition should not exclude active management as needed to address forest health issues and ensure all seral stages remain healthy and resilient.

? Inventorying old growth and mature forests on Federal Lands

While this RFI has not asked for input on inventorying old growth and mature forests, the Executive Order does. We are concerned about how this mandate will be addressed and how that will affect forest management needed to address our forest health and wildfire crisis and felt obligated to include a brief statement in this RFI.

Addressing our forest health and wildfire crisis is paramount. Both the Forest Service and BLM have current inventories that utilized FIA Program information and remote sensing technologies for the calculation. We

recognize the large margin of error that can exist using these remote sensing tools but also understand the huge time commitment required to get this done with boots on the ground. Climate impacts, catastrophic wildfires, insect infestations, and disease have been identified by the President as the greatest threat to old growth forest, not the lack of inventory data. We urge both the Forest Service and BIA to utilize existing data collection systems and SAF stand definitions to develop your inventories.

In conclusion, we urge the administration and government agencies to focus their attention on the forest health and wildfire crisis we face in the United States. Don't commit critically short resources to reinvent the information we already have regarding definitions and inventories for old growth and mature forests. Our forests and communities are burning up, citizens health and lives are at risk, and water quantity and quality are at stake. We must treat this crisis as emergency and implement the promise the administration has made to increase the pace and scale of forest restoration. Thank you for the opportunity to comment on this RFI and we look forward to a speedy end to this process.