Data Submitted (UTC 11): 2/1/2024 7:34:11 PM
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Comments: The Idaho Forest Owners Association appreciates the opportunity to comment regarding the Forest Service's proposed amendment to most, if not all, national forest and grass land management plans to sustain and enhance old growth vegetation. It is laudable that these efforts include recognition of local economic circumstances as well as forest health and resiliency. These are not mutually exclusive objectives, but co-dependent elements of rational forest management policies.

We strongly feel that the term "Old Growth" is inappropriately defined in current National Forest Management Plans and inappropriately applied on the ground. "Old Growth Forest Types of the Northern Region" (Green et al. 1992) is the reference quoted in National Forest Management Plans and the Forest Plan standard, but in practice a size-based system that ignorantly violates all kinds of known ecological indicators and measures is applied. Current practice would class an 8-year-old super poplar as old growth, but not a 9,000-year-old bristle cone pine. Aspen stems can be small and young while the mother clone root system can be enormous and ageless.

A scientific approach to the definition of old growth usually takes forest origins, species composition, seral stage, and ecological function into account. The following definition from the UN Food and Agriculture Organization (FAO) is a nice tight one that captures these more rational considerations:

Old growth forests (AKA primary forests) are defined as "naturally regenerated forests of native tree species, where there are no clearly visible indications of human activities, and the ecological processes are not significantly disturbed."

Large areas of non-seral species in national forests are classified as "Old Growth" and not available for management when they are often dominated by decadent second or third growth which has resulted from previous disturbances due to fire or lack of post-harvest management.

Many of our members live and work in communities that are directly affected by sweeping, national, forest management strategies which do not ease their frustration, or the frustration felt by Forest Service fire and forest managers. From first-hand accounts, the degree to which these managers' efforts are stymied by restrictions developed through environmental blackmail is astounding. These committed professionals are subjected to the worst possible career experiences when they observe decades of silvicultural plans go up in smoke because a thunderstorm or a highway car-fire ignites a conflagration in untreated and infested woodlands before a fifteen-year-old treatment plan is finally allowed to move forward. Stories abound (again first-hand) of untreated riparian areas acting like candle wicks when a fire rages through the drainage bottom because of fuel build-up and the surrounding treated stand is left largely intact. Wildlife biology experts' concern for habitat is given a higher priority in planning over more rational fire resilience concerns resulting in loss of both.

The IFOA calls upon the Forest Service to enhance the ability of local managers to do their jobs through local engagement and focused environmental impact statements. The proposed approach with a one-size fits all EIS will only further alienate communities in the wildland/urban interface and limit rather than enhance collaboration among stakeholders.