

**Mature and Old Growth Forests: Executive Order 14072 Section 2(b):
July 21, 2022-Responses to Questions Raised During Public Session**

Participant	Question	Notes/Responses
Leanne - SERCD	Are you really expecting to have the inventory complete by April 2023? We do not believe this is for an accurate inventory. Ground truthing is a key component of any inventory process. We snow up anywhere from late October to November and snow doesn't come off until as late as July before roads to where the old growth areas are near us.	Yes, we anticipate having the inventory complete by April 2023.
Bill Imbergamo	What changed from 2012 when the FS said in the planning rule that it would be best handled through the local planning process?	We are not aware of any changes to the 2012 Planning Rule; this current effort is about implementing section 2(b) of Executive Order 14072. Other sections of the Executive Order require development of policy but that is not the focus of this current effort.
Robyn Whitney National Association of State Foresters	<p>Most scientists seem to agree that multiple definitions of old-growth are needed to account for the diversity of forest types across and amongst regions.</p> <p>In many old-growth forests, the dominant trees have wide range of ages and density. Today's old-growth forests developed from disturbances and under the climate conditions of the last millennium. The particular composition and structure of these old-growth forests may not occur again under modern climates and disturbance regimes.</p> <p>Because we are dealing with complex ecosystems, we need to be comfortable with flexible terms and some ambiguity in defining old-growth.</p> <p>Are the agencies planning on developing multiple definitions?</p>	<p>Preliminary ideas for addressing the requirement in the Executive Order to develop a mature and old growth definition for Federal Land include developing a definition framework that recognizes ecological variation to promote resilience in current and future climate conditions and spans vegetation types, species, disturbance processes, and geographic areas. We welcome your input on what a mature and old growth definition framework should include via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239.</p>
John	<p>I work for 11 Midwest tribes and we did not hear of the consultation mentioned.</p> <p>Who should I contact to make sure our member tribes are contacted re: this E.O.</p>	Contact Reed Robinson, Director of the Office of Tribal Relations, USDA Forest Service at reed.robinson@usda.gov .
Patt Dorsey	If I understand correctly we do not need to send comments to the USFS and separate comments to the BLM. You are jointly reviewing comments?	Correct, the Forest Service and the Bureau of Land Management are jointly reviewing comments received
Felton, Andrea - FS	Could you clarify: are you expecting the foresters to complete on-the-ground inventory within the next year, or are you all just needing to finish the guidelines and manual about how to inventory?	The Executive Order requires the USFS and BLM to define, identify and inventory mature and old growth forests and to make the inventory available by April 2023. Once we've established the definition framework we will develop and implement our approach to the inventory. We welcome your input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Patt Dorsey	And a second question - about ecosystem based, but universal framework - we are not looking for separate definitions by ecosystem? You are looking for a "universal" definition that takes into account how ecosystems function?	Correct, one universal definition framework with specific criteria by ecosystem is our preliminary thinking but we welcome your input on what a mature and old growth definition framework should include via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Barnes, Elizabeth - FS, COUNCIL, ID	Will there be any oversight to ensure local units are providing an accurate inventory?	Once we develop the mature and old growth definition framework, we will develop our approach to the inventory. Any inventory will adhere to standard Agency protocols and methods. We welcome your input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Bill Imbergamo	How many FTE's at the FS will be engaged in conducting the inventory rather than implementing the 10-Year Wildfire Strategy?	This is not known at this time; we have not yet developed our approach to conducting the inventory. The staffing and cost will depend on the method ultimately chosen. An inventory will help inform implementation of the 10-year strategy. The need to conserve mature and old growth forests while addressing the wildfire crisis is included in the Bipartisan Infrastructure Law; these need to be addressed together. We welcome your input on the inventory phase via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Rick Landenberger	Are the existing stand maps, with their spp composition and ages, planned to be used as a basis for the new inventory? If so, be careful and use these 'conservatively' because they oversimplify, miss older remnant trees, and in some cases are simply wrong (on my local NF).	This is not known at this time; we have not yet developed our approach to conducting the inventory. We welcome your input on the inventory phase via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239

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Daines Office	What is the estimated amount of staff, staff days, and associated cost required to create an inventory of “old-growth” and “mature” forests on Federal Lands and which mission areas and budget accounts will be charged with executing this initiative?	This is not known at this time; we have not yet developed our approach to conducting the inventory. The staffing and cost will depend on the method ultimately chosen and the mission areas and budget accounts used. We welcome your input on the inventory phase via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Leanne -SERCD	How will this new definition of Mature and Old Growth Forests impact current Forest Plans? Do you anticipate the definitions currently in forest plans being implemented staying in place until an forest plan amendment or new forest plan is done?	All land management plans have some level of protection for old growth forests. We have definitions developed at a local level in Forest Plans. We are developing a definition framework now as part of this current effort that considers a suite of values for these forests. Our current effort to develop definitions will not impact any current protections in place. We are looking to develop a framework to define, then inventory mature and old growth forests, and then later to consider policies related to management. We welcome your input on these future steps related to policy development. There will be opportunity for public input on these future steps.
Quintin Legler, UPM	It seems that to have 1 definition to cover all the lands the definition would have to be too vague and could be interpreted differently.	Preliminary ideas for addressing the requirement in the Executive Order to develop a mature and old growth definition for Federal Land include developing a unifying definition framework that recognizes ecological variation to promote resilience in current and future climate conditions and spans vegetation types, species, disturbance processes, and geographic areas. We welcome your input on mature and old growth forest definition development via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Adam Rissien (WildEarth Guardians)	The Forest Service's Inventory and Analysis Program includes many tools to perform inventories and lauds itself as the nation's forest census. Does the FIA already have an inventory of mature/old growth forests? If not, would this program serve as a means to perform such an inventory once the definitions are final?	The Forest Service’s Research and Development Branch oversees the Forest Inventory and Analysis Program, which conducts a nationwide statistically designed annual forest inventory of all lands and ownerships and is considered the international model for this purpose; this may be a likely place to start for the inventory of mature and old growth forests. Initially the inventory could be an assessment of the area of old growth using the FIA existing inventory data, based on the developed definitions for mature and old growth from this current effort. The definition framework will help us determine how we might be able to leverage FIA to determine extent of mature and old growth on federal lands. It’s a valuable dataset that will inform this effort in some way. FIA currently does not formally use the term old growth; in discussions with other nations, the term 'primary' forest has been one term that seems to have more agreement. We welcome your input on definition development and inventory methods via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Hugh Irwin	Seems like the April 2023 inventory timeline will require use of remote sensing data and GIS modeling. Can you talk more about how the inventory process will be conducted.	This is not known at this time; we have not yet developed our approach to conducting the inventory. We welcome your input on the inventory phase via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Buzz Williams	Will the Forest Service halt timber sales (during inventory period) where timber stands within these sales have met Regional old-growth criteria and the Forest Service has confirmed.	The Executive Order does not direct BLM or USFS to set up any moratorium on activities. It does not require changes to our management programs. Timber sales that have been planned and advertised in accordance with forest plans will continue during this process to develop a definition framework and conduct an inventory.

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Steve Cole	FWIW, the slide deck was also not visible for me by default. I finally realized that one of the participant thumbnails was the shared screen of slide deck so I just clicked on that thumbnail and then I was able to see the slide deck. Teams sometimes changes visual focus so I had to occasionally re-click on the shared slides in order to have it redisplayed.	Glad you were able to figure out that out. The slide deck is posted to the website for reference as well: https://www.fs.usda.gov/managing-land/old-growth-forests
Quintin Legler, UPM	On the inventory aspect, what land manager wouldn't have a pretty good idea of what they have? I understand if the definition changes compared to what a particular area is using, nevertheless, it should be available. I'd like to see what particular forests would be currently using.	Thank you. See response below to Bill Imbergamo's question.
Bill Imbergamo	Don't most Forest Plans have - or refer to - a locally based, or at least regionally based, definition of old growth? Ex Old Growth, Plumas National Forest, destroyed in 2012. Does this still count?	Yes. The Forest Service continues to emphasize locally based land management planning. Applying the 2012 Planning Rule, particularly the provisions to "maintain or restore ecological integrity," is one apparatus to motivate conservation and effective, active management of mature and old-growth forest on NFS lands. The Forest Service has a well-established set of old-growth definitions for all Forest Service regions and all major forest types. These definitions have been used and improved on for more than 30 years through the development of land management plans. Each national forest and BLM unit has a land management plan governing activities on that forest. The appropriate set of old-growth definitions have been used in developing the plan components or management direction in each land management plan.
Rick Landenberger	Mature' is a fuzzy and confusing term for trees unless it is strictly refers to reproduction. The term can be and often is used to make an argument for cutting.	The Executive Order requires the USFS and BLM to define, identify and inventory mature and old growth forests. We welcome your input on what a mature and old growth definition framework should include via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Reeder, Erich M	Forests have been inventoried in many different ways over the decades by many different people, so inventory databases are often inconsistent.	We welcome your input on methods for conducting the inventory via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Jeff Juel	After your first answer, still, the word "framework" is vague in the phrase "definition framework"? Why not just say "definition" recognizing there could be many?	Developing one precise definition is challenging because species, growing conditions, and disturbance agents (such as fire, insects and disease, and storms) vary drastically among forests. We have preliminarily described this as an overarching definition or "framework" that considers the many attributes being used in land and resource management for a variety of forest types and ecological conditions.
Peters, Emily (DNR)	Is USFS/BLM incorporating a document search/synthesis into this work? For example, gathering information from existing FS plans and state forest plans/policies related to OG definitions? I'm wondering if it'd be useful or redundant to share information about Minnesota Department of Natural Resources' old growth definitions?	Sharing information like the Minnesota Department of Natural Resources' definitions would be helpful. Please share them via the the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Jeff Juel	EO says "...make the inventory publicly available". Does that mean the inventory will be spatial, on maps or can be viewed and/or mapped by the public.... OR will it be simply statistics such as those derived from Forest Inventory and Analysis?	This is not known at this time; we have not yet developed our approach to conducting the inventory. We welcome your input on the inventory phase. We envision a future step including the development of some form of spatial display of relevant information.
Sharon Friedman	Are you going to be looking at former old growth definitions/inventories in forest plans and see if they have helpful info.	We are working now to compile existing mature and old growth definitions from a variety of sources, including forest plans.
Reeder, Erich M	Here's a good one for forests of the PNW from 1991: https://andrewsforest.oregonstate.edu/pubs/pdf/pub1244.pdf	Thank you.
Kathy Johnson	Does this directive preclude thinning of younger trees within mature forest?	Executive Order 14072 does not preclude thinning of younger trees within mature forest.

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Mike Hyde	What is the purpose of this whole effort? Is it a ploy by the radical environmental community that the Biden Administration caters to, to encourage managing forests like a museum, resulting in increased fuel for wildfire, higher prices for lumber, less affordable housing, etc...? Or is it an effort to finally turn around the decades of passive forest management and get to work to actively manage mature forests to reduce fuels, allow thinning to enhance forest health, increase timber harvest and reduce timber imports?	In-chat response: Barnes, Elizabeth - FS, COUNCIL, ID"Mike, not all old growth forests are in high or even medium risk fire sheds. To the contract, old growth are typically in lower disturbance ecotypes it could be argued... hence old-growing." The objective of this current effort is to implement the goals of the Executive Order 14072 specifically to develop a mature and old growth definition framework that considers the important values provided by old forest conditions, recognizes existing and evolved definitions to provide an improved picture for land managers to guide sound, science-informed, decision-making.
Venegas degeorgio, Christopher - FS, Dillon, MT	This could be a great opportunity to develop more gradations of forest age. While some pristine areas may qualify as "old growth," others may not. We shouldn't greenwash these maturing pristine OLDER stands and give ourselves more credit for old growth acres than there are. That said, those maturing stands may achieve old growth if left unmanaged or managed with Old Growth status as a goal. Can we please develop more categories to capture those grey areas and systematically bring older growth stands into Old Growth status through our management decisions? Protect Old Growth, and encourage older stands to become Old Growth.	Thank you for this feedback. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
John	While this initiative might not halt currently proposed timber sales it should pause NEPA processes (EA ROD's) that have not yet considered this E.O. Will it?	Our current effort to develop definitions will not impact current management or planning -via NEPA or other processes at this time. We are looking to develop a framework to define, then inventory mature and old growth forests, and then later to consider policies related to management. We welcome your input on these future steps related to policy development via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239 . There will be opportunity for public input on these future steps.
Doug Heiken	The EO creates an immediate policy to protect mature and old growth. Don't wait for inventory to implement this policy.	Our current effort to develop definitions will not impact any current management or planning for them via NEPA or other processes. We are looking to develop a framework to define, then inventory mature and old growth forests, and then later (see Section 2c of Executive Order) to consider policies related to management. We welcome your input on these future steps related to policy development. There will be opportunity for public input on these future steps. We welcome your input now via the online commenting portal and in future when we begin the policy development phase
Bill Imbergamo	Do the lead agencies plan on inventorying National Parks, National Wildlife Refuges, and State Parks for their OG stands?	The Executive Order specifically requires that only BLM lands and National Forest Systems lands be included in the definition development and the inventory
Mike Hyde	You have committed to work in consultation with tribes; what about working in consultation with states; which are also sovereign entities and may have forestry and fire expertise to offer?	We plan to solicit input from states and other stakeholders as part of this effort
Daines Office	In addition to being incorporated at the plan-level, the Forest Service has developed regional plans to conserve old growth forests including the Sierra Nevada Plan Amendment, Northwest Forest Plan, and old growth limitations in the Rockies. How did the Administration arrive at the conclusion that the multiple, existing, locally driven protections were insufficient? Please provide examples of issues that arose that now justify a national top-down approach.	The Forest Service developed plans such as the Sierra Nevada Plan Amendment and the Northwest Forest Plan, and crafted LMPs in the Rockies using existing data, engaging existing management approaches, and responding to projections of forest conditions at that time. Given the rapid pace of changing natural disturbances such as fire or insects and disease, the scope and types of threats to mature and old-growth forest have changed. Furthermore, developments in effective active management (e.g., thinning) resulting in more effective conservation of old forests—particularly reducing the probability of stand-replacement fire—indicate that improved management is possible even in lands with well-crafted earlier land management plans.

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Alex Craven (Sierra Club)	In addition to the CARA link, is there a mailing address and/or an email address where the public can submit comments?	All comments must be submitted via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239 before the August 15 due date to be considered.
Barnes, Elizabeth - FS, COUNCIL, ID	A positive outcome of this initiative could be to establish more "reference forests" for old-growth per region, both stellar examples as well as identified tracts for redundancy in case the former are destroyed. Some secondary regions may have to include more "mature" or "transitioning" forests to make up for a lack. There is some danger in being too generous with the definition... they will lose value/justification for protection if we identify millions upon millions of acres. A careful balance.	Thank you for this feedback. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Kalina Vatave	Could reference to state forest inventory or State Wildlife Action Plans be part of a framework? Is the FS considering actions/definitions states are already implementing?	Thank you for this feedback. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Rondeau, Renee	Most of the answers on this meeting have been answered from the USFS side, yet BLM is part of this. Can we make sure that we here from BLM on some of these issues	The BLM is working closely with the Forest Service at every step of the definition development and inventory in Section 2(b) of EO 14072. Both Forest Service and BLM along with experts from other Department of the Interior bureaus are meeting routinely as an interagency team, and any communication from the team related to Section 2(b) can be viewed as having had BLM input.
Matt Simmons	How would this policy impact fire killed old growth trees and the development of complex seral forests? In Northern California, the USFS frequently targets the largest diameter trees for removal after a fire which hampers the development of forests into forests with late seral characteristics.	Our current effort to develop definitions will not result in any on the ground impacts. We are looking to develop a framework to define, then inventory mature and old growth forests, and then later to consider policies related to management. We welcome your input on these future steps related to policy development. There will be opportunity for public input on these future steps. We welcome your input now via the online commenting portal and in future when we begin the policy development phase
Mike Hyde	Each national forest has a plan that should give a good indication of where the mature of old growth forests are. The same for BLM RMPs. Why waste money in this effort when the federal government is over \$30 trillion in debt?	The Executive Order requires the BLM and USFS to define, identify and inventory mature and old growth forests on federal land.
Daines Office	On January 18, 2022 you launched the "10 Year Strategy to Confront the Wildfire Crisis" which called to increase fuel and forest health treatments by "up to four times current treatment levels in the West." How will spending one year creating a definition and inventory of "old-growth" and "mature" forests and cataloging risks assist in achieving this goal?	The Executive Order calls for promoting the health and resilience of mature and old-growth forests, including mitigating wildfire risk. The efforts are complementary.
Ben Jones	Still struggling with the "universal" framework for mature and old growth together. We as natural resource professionals have some experience with old growth criteria. However, mature forest is another matter entirely with several of the many definitions cited in this chat bar (reproductive, longevity, rotational maturity, etc.).	We agree the task at hand is complex. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Steve Cole	I'll submit this electronically but I hope there will also be a set of guidelines and "best use" directions for the use of the end product since it will be used to challenge future proposed projects/timber sales. To put another way, there should be suggestions/advice developed on how to resolve the inevitable conflicts between what the dataset suggests and the project level conditions.	Thank you for this feedback. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Barnes, Elizabeth - FS, COUNCIL, ID	Daines, In the past few months we've also passed the REPLANT act, the Climate Resilience act, and others. we often have to respond to multiple land management laws and EOs at once.	Thank you for this feedback. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Langdon, Christopher A	LSRs (under the NWFP) were identified due to their ability to develop into large blocks of NSO habitat over time, not due to the existence of OG in them.	Thank you for this feedback. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Lauren McCain	Conserving biodiversity associated with old/mature forests is included in the EO. Is the Forest Service considering how it will provide the basis for this through the inventory process? Additionally, the national forests are required to select focal species during plan revisions to monitor ecosystem conditions. Given the slow pace of revisions, how will the Forest Service provide sufficient monitoring to assess trends in conditions as well as trends in at-risk species abundance/viability?	This is not known at this time; we have not yet developed our approach to conducting the inventory. We welcome your input on the inventory phase. We envision a future step including the development of some form of spatial display of relevant information.

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Eric Jorgensen	What is your current timeframe for development of policy to conserve mature and old growth forests in the future phases you envision?	We envision the effort to develop policy to start following completion of the definition and the inventory after April 2023
Sharon Friedman	Will that roundup of previous definitions be publicly available? Where are the points that we can see and comment on these analyses?	The compilation of the definitions from Forest Service land management plans are planned to be published as a research paper.
Bill Imbergamo	Here's some: https://www.fs.fed.us/projects/hfi/field-guide/web/page24.php . Healthy Forests Initiative and Healthy Forests Restoration Act, Interim Field Guide Here's harvest information by region since dirt was new: https://www.fs.usda.gov/forestmanagement/documents/harvest-trends/NFS-HarvestHistory1984-2017.pdf	Thank you for this feedback. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Ben Jones	Old growth and mature are forest successional states. Will other successional states that are important for biodiversity also be prioritized for inventory (i.e., young forest)?	Thank you for this feedback. We have not yet developed the framework and welcome your thoughts on what it should include. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239
Sharon Friedman	Some were also harvested before they were acquired.	Bill Imbergamo: "Sharon yes, including 90 percent (ish) of Eastern NFS"
Chris	The executive order says " My Administration will manage forests on Federal lands, which include many mature and old-growth forests, to promote their continued health and resilience; retain and enhance carbon storage;" Given current science on carbon emissions from logging doesn't this mean logging will have to be reduced to ensure carbon stores are maintained and enhanced?	Matt Ross: "@Chris: https://www.fs.usda.gov/sites/default/files/Forest-Carbon-FAQs.pdf " Matt is correct in citing this resource for more information. Logging does not necessarily have to be reduced to ensure carbon stores are maintained and enhanced.
Chris	Given it has taken 4 out of 12 months to start on getting public input on a framework of old growth how will the Forest Service complete the very challenging work of identifying mature forests accurately via remote sensing? This lack of urgency is mirrored in the Forest Services stance on climate change. How do we know that the forest service is taking seriously the 8 years that we have to half our carbon emissions to avoid the most catastrophic consequences of climate change according to the IPCC ?	We have been compiling existing definitions and inventory approaches. The use of remote sensing is one approach among several for conducting inventories. We would like to note that Forest Service scientists have been contributing to IPCC work for over 30 years, among many other activities that inform climate change related actions. We welcome your written input via the online portal https://cara.fs2c.usda.gov/Public/CommentInput?project=NP-3239 . Forest Service approaches to carbon emissions can be found at https://www.fs.usda.gov/managing-land/sc