

February 11, 2023

Joint NAFSR - PLF Response to MOG Initiative Team

Dear Mature and Old Growth Initiative Team,

Thank you for the opportunity to participate in the webinar to update us on the MOG effort. We were very impressed with the efforts of the team, so thank you all for your hard work! We do have a few suggestions, based on our experiences as long-term career employees of the Forest Service and BLM.

1. Regarding the simpler (relative diameter) versus more complex ways of deriving mature forest, we argue for the simpler. In addition to the question of whether the Oliver/Larson approach and thinking is even relevant to dry forests, ultimately to build trust the Forest Service and BLM will need to communicate with people in communities. The simpler the better.

2. During much of our discussion at the webinar, it wasn't clear what the purpose of the collection of information was. If it is simply to get a national carbon estimate, that would be one thing. Or even to get an annual national carbon estimate by fireshed. But it was also clear that some organizations see this as an effort to stop cutting trees. As policy

is developed, then, it would have to be applied at the ground level. And yet, as was said, FIA data is not appropriate for that. Perhaps a table that shows what data is to be used for what decisions would be a better way of communicating the different scales of data collection and what they are to be used for.

3. There was discussion at the webinar about the tension between more involvement and "getting it right" vs. "getting it done in the required timeframe." We would weigh in on the

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"getting it right" side. There is always the possibility of litigation if any steps are skipped or hurried.

The NAFSR Board recently heard from Brian Ferebee that the Wildfire Crisis Strategy is requiring a major push by the agency and its partners. At some point, there could be a conflict between potential MOG policies and the Wildfire Crisis Strategy in terms of fuel treatment projects. It seems to us that this requires a great deal of care and coordination at all the steps of the process.

Please continue to keep us in the loop as this effort progresses, and we are willing to help you with ideas or reviews as things move forward.

Steve Ellis

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