

Data Submitted (UTC 11): 1/28/2024 5:00:00 AM

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Comments: REGARDING:

Standards for Management Actions Within Old-Growth Forest Conditions-(Pg. 88047, Fed Reg, 12/20/2023):

Standard 2(a).

Regarding: "Proactive stewardship activities shall promote one or more of the following:

i. amount, density and distribution of old trees, downed logs, and standing snags."

COMMENT: Promote the density of old growth? Forests in the west are generally too dense that contribute to mortality of large trees from drought, bugs and climate warming. Scientists (M.North & others , 2022, enclosed, "What is forest resilience and how do we measure it?", Ca. Fire Science Consortuim) showed that increasing Stand Density beyond 35% increases mortality. Promoting density should not be a standard. And similarly science and experience has shown that increasing heavy ground fuels including downed logs increases the risk of crown mega wildfires. Promoting density and downed logs should not be standards because they have been shown to promote high severity wildfire that kills all trees. Climate change over the next 50-100 years increases competition for water that will hurt forests if not taken into account in management. Delete or rephrase. The standard could be reworded to protect old growth from severe fire and disease.

ATTACHMENT: 2022 North_Resilience 2pg summary.pdf. Research Brief for Resource Managers. What is forest resilience and how do we measure it? North, Malcolm P., et. al. "Operational resilience in western US frequent-fire forests." Forest Ecology and Management 507 (2022): 120004. <https://doi.org/10.1016/j.foreco.2021.120004>