

Data Submitted (UTC 11): 7/25/2022 12:00:00 AM

First name: STEPHEN

Last name: WEAVER

Organization:

Title:

Comments: Please refer to the Dictionary of Forestry/John Helms, editor, published by the Society of American Foresters (SAF) (ISBN 0-939970-73-2), 1998. Terms and definitions compiled reflect current professional acceptance and use. Pls look at page 113 for "Mature" and page 127 for "Old-Growth" Forest addressing your five points. This dictionary permits consistent use of professional language. The Dictionary is a product of the working group program of the SAF, about 100 people over a three-year period worked to develop and refine terms and definitions specific to their description. Additionally, I have mixed concerns regarding the Old Growth Management/network. First, the Forest Service recognizes that creation of early successional forests is unlawful in designated Wilderness, Research Natural Areas and corridors classed "Wild" of designated Wild and Scenic River Areas. As such the existing forest vegetation conditions overlaying those designated lands could achieve over time "old growth characteristics". I acknowledge this as a common-sense approach as the existing federal designation "forever wild, untrammeled by man" is an unmanaged hands-off "passive" approach. Second, the Forest Service seems to embrace this passive approach for old growth as those lands are idled by its special status. We can expect without management intervention existing vegetation will just become "Old Forest" ripe for impact from natural forces of wind, wildfire, flood, native and non-native insects and diseases depredation. You have not far to look around our Southern Appalachian National Forests lands to see the loss of Eastern Hemlock from a non-native insect over the past decade. This has left large swaths of dead standing and fallen woody debris posing a safety hazard to the public and firefighters. Eastern Hemlock never to be a component of "Old Growth". Close to our memory are the significant impacts of the 2016 Fall Wildfire Season on our Southern National Forests and its residents/property/values at risk adjacent to these idled designated lands. Last, it is clear that unless the pace and scale of timber harvesting, silvicultural treatments, creating defensible space at the wildland urban interface and employing prescribe fire regimes across the landscape that the National Forests will not approach a balance of diverse tree species and age classes, structural stand diversity, and even the old growth characteristics desired to have sustainable and healthy ecosystems.