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Comments: The definition the Chief used for Old-Growth in 1989 describes unmanaged forests and accurately describes the type of landscapes that are suffering catastrophic wildfires and insect infestations. By distinction, managed "old-growth" and "mature" stands differ greatly by being resilient, healthy, without diseased and dying or insect infested trees, and are obtained over time by having a variety of age classes that progress along a silviculture pathway where management activities are designed to promote forest health and resilience. I think the definition of desirable and healthy Old-Growth and Mature Forests, outside of wilderness areas, must recognize that these stands are dynamic and change over time, and should include management as the method to achieve healthy and resilient stands in these categories; and that to achieve these stands in perpetuity we must maintain a healthy balance of all age-classes. Perhaps the definition should include what constitutes healthy and resilient Old-Growth and Mature Forests across a landscape and what constitutes unhealthy and at-risk old-growth and mature forests across a landscape. I think the inventory will strongly correlate with where the problems with wildfire occur, and if done smartly will make a strong case for management.

In addition, I think it is a mistake to imply that managing for Old-Growth and Mature Forests is the best climate-smart way to manage forests for carbon sequestration. Science shows that managing for healthy and resilient forests and harvesting trees and making long-lived products out of the wood while regenerating healthy and vigorously growing stands of trees is a superior climate-smart strategy.