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Comments: The og forest is clear -- 120 to 140, depending upon species. I concentrate on "mature" forest. In the PNW, any conifer forest is likely to be "mature" if it is "naturally regenerated" and initiated by 1945 or earlier. Natural regeneration and initiation prior to 1946 are critical, for it was post-WW II when plantation silviculture and primitive pesticides became common use in forestry.

We live adjacent to Ft. Worden State Park in Pt. Townsend, WA. The army slicked off the standing timber just prior to 1900. The forest is now c. 120 years old, naturally regenerated, and it has been "mature" -- with residual stems -- for c. 40 years. It is now approaching o.g. status, with trees well over 110' tall and dbh c. 20" - 24". I hike this park daily when home, so I am quite familiar with "mature" forests.

When I worked for TNC (30 yrs), I once accompanied Dr. Jerry Franklin (Forest Ecologist and co-author of the PNW Forest Plan) in the field. I recall his assessment of some naturally regenerated, mature forest at that time. Franklin said, and I paraphrase, that naturally regenerated, mature forests were possibly the rarest forest type. Some of these have been converted to plantation by the USFS. On the private side, nearly all forested acreage has been converted to plantation silviculture. Little wonder that "mature" forests are at such a premium today. Logging of public forests, especially the pre-1945 forests, remains the primary threat to the re-establishment of "mature" and o.g. forests in the PNW. More frequently we hear "thinning" these mature forests as a way to make them more fire-proof. This is an industry-driven excuse for continuing to get-the-cut-out. Please do not buy-in to this illogic. The one thing that appears to be irrefutable about fire-proofing a building is clearing the area surrounding the building of highly combustible material. This approach also holds for small to medium-sized towns. If the residential areas have low-combustible fuels or a dirt or gravel base, the buildings are generally protected from fire. This is what the USFS and the BLM should be concentrating on -- the forest/residential interface -- not the forest itself. We need to protect both residences and our mature/o.g. forests -- and the latter generally do not need to be entered.

In sum, I request the USFS and the BLM define "mature" forest as occurring post WW II in the PNW, and that they be naturally regenerated forests -- not plantations. In general, these "mature" forests are now between 75 - 80 yrs old, at their youngest. These rare forests, which will advance to become o.g. forests in the future, must not be entered to "accelerate" growth or to "fire-proof the forest." We have seen what fire suppression strategies have given us. It is not a pretty picture.