

Data Submitted (UTC 11): 7/27/2022 12:00:00 AM

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Title:

Comments: I am surrounded on 3 sides by Gifford Pinchot National Forest, in Washington State. There are miles of trails behind my home, which go through several different ages and management history variances in stands. Much of this forest is second growth stands, replanted after the native forest has been harvested back in the early 1990s. Other sections, are old growth forest, by any existing definition of the term. Trees over 300 years old, diverse species, DBH's over 6'. So, where does the true definition lie? Somewhere between these two forest stands.

And of course, this is just here in the Western Cascades. What old growth forest is varies greatly by the location it is being surveyed.

I believe that we need to harvest more and thin our forests against wildfire. This is because we overplanted in monocultures, only looking towards economics to guide our forestry decisions.

Old growth forest is defined in many ways, but in general, it should also include Late Seral forests that are almost exhibiting old growth characteristics, and will be in the next few decades. These forests are usually less than 100 trees per acre, and may or may not include a diverse array of tree species. Approaching this from a carbon perspective, the most important things to focus on are tree DBH, and tree density. Trees over a certain DBH should not be harvested, and trees that are considered overcrowded should be thinned to 100-200 trees per acre.

I believe that easy to follow rules can be established to increase thinning of overcrowded, early seral forests that protects the more mature forests that are either currently old growth, or will be in the next few decades.

In my opinion, each USFS region should be assigned a different set of criteria for their old growth definitions.

Here in Region 6, these are the criteria that we should adopt.

Criteria should include:- On previously harvested lands, age of stand is known. For softwood forests, any forest over 50 years of age should be protected. For hardwoods, anything over 60 years as well.- DBH: Softwood forests should exclude all cutting of trees over 20". There are only a few mills that can handle logs larger than this, and it will encourage a transition to second growth logging and incentivize thinning of denser forests.- Under no circumstances should native forest (original forest that has not been logged before) be harvested for any reason. We are down to the last couple % of this remaining, and it makes no sense outside of economics for harvesting this. It should be left for the future American generations to enjoy and research.