

Data Submitted (UTC 11): 8/15/2022 1:15:22 AM

First name: Douglas

Last name: Wood

Organization: Trails

Title: Sole Proprietor

Comments: Thanks for the opportunity to comment. I use eleven characteristics to help identify OGF in mixed mesophytic forests in West Virginia. The characteristics were drawn from several lists compiled by some forest research experts, state authorities, and from the Monongahela National Forest's Management Plan. Some of those lists had fewer than eleven characteristics, some had more. In my research for developing the OGF identification class I teach to Master Naturalist students and other interested persons and organizations, I found that it is appropriate to list characteristics for each forest type for the characteristics may be different from one type to another. There is no OGF identification standard that will fit all forest types.

While it may seem daunting to attempt to develop OGF characteristics lists for each forest type found on America's federal lands, there is one thing to keep in mind for each forest type, i.e., the primary driver of what results in an OGF is the length of time between the last major canopy-altering event (human-induced or natural phenomenon-induced) and the normal rotation age of the species that make up the super-dominant class of trees extending vertically above most other canopy trees.

This task could be dragged out forever, but climate change is happening fast, so it is imperative to err on the side of caution and go ahead and use existing lists of characteristics from OGF experts, state authorities, and federal authorities to begin setting aside acres that have those characteristics. Don't wait. Tweaking can take place later. You feds need to get some acres protected right now if the OGF protection initiative is going to make any difference to climate change in the near future. Talk to the experts for each forest type in each forest region of the U.S.A., and be sure to include forest ecologists (terrestrial and aquatic), tree growth experts, wildlife experts, and forest soil experts for each region and forest type.