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Comments: To whom it may concern at USDA Forest Service and Department of the Interior, regarding Old Growth Forest Management Plan, #65356.

I am writing to express my request that Old Growth Forest Management NOT include removing ANY younger/smaller trees from these unique forests. So called "thinning" (also called ecological thinning or prescription thinning or even ecological restoration) is usually done with the declared intent of reducing wildfire risk. However, the scientific evidence that thinning ANY forest is actually an effective way to reduce wildfire risk is weak and/or erroneous. And there is no evidence that thinning reduces wildfire risk in old growth forests.

As a resident of California, I am aware of recent instances of catastrophic wildfires (eg. the Dixie Fire) in our state where the fire exploded through vast areas of previously thinned forest to ultimately destroy hundreds of homes and kill many people and animals. I am not a forest scientist, but I am a biomedical scientist, and I am very familiar with "scientific method design" and statistical analysis.

I have read many of the most recent scientific papers reports that claim to provide evidence that thinning forests is an effective wildfire prevention tool. Perhaps the best example of such "evidence" is provided by University of California forest scientists in a 20-year study on a 4,000 acre experimental forest managed by the University. This was published in November 2023 in the online journal, Ecological Applications.

Concluding from this study, which used computational modeling (as opposed to real world observation), that thinning is an effective tool to reduce wildfire risk is like comparing a study on the effect of a new drug on mice and concluding that it also has an equal effect in humans. A 4,000 acre plot is not a National Forest, and computational analysis (using computer modeling to make a conclusion) should not be taken as evidence that those results can be extrapolated to large forests, and certainly not to old growth forests.

Health care practitioners have a very old rule: Primum non nocere - or First, do no harm. There are many ways that carrying out thinning of old growth forests could cause irreversible harm, and the benefits are totally unpredictable and unproven.

Thank you for considering my request to not thin old growth forests.

Respectfully, L. David Engel, Ph.D.