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First name: Rich

Last name: Fairbanks

Organization:

Title:

Comments: Although most old growth has been liquidated by past logging, the current threat is primarily from high severity fire. Prescribed fire can help to protect mature and old-growth forests from uncharacteristically severe fire (Keane, R.E., et al, 2021). I see an urgency to protect remaining mature and old-growth trees with prescribed fire and reduction of adjacent surface and ladder fuels. I know that in the past decade in California, 50% of mature forest habitat and 85% of high density mature forests have either transitioned to lower density forest or to non-forest vegetation types (Steel, et al., 2022. [https:// doi.org/10.1002/eap.2763](https://doi.org/10.1002/eap.2763)). High severity fire is killing off the mixed conifer old growth. Low severity fire may be the key to saving what remains.

I believe specific and ongoing appropriations should be applied to identifying and under-burning stands adjacent to mature and old growth stands. I see this as necessary to limit overstory mortality in old growth and to build stand resilience to subsequent wildfire. Using managed fire to avert high severity fire is an ancient practice, used for millennia in western forests. We can re-learn how to apply fire on a landscape scale, to protect mature and old growth forests.

Other fuel treatments, including the removal of small diameter trees, pruning of ladder fuels and pile burning may be used in this race against time to protect ancient trees, provided these mechanical activities are seen as a specific treatment to set up stands for restoration of a fire regime. Prescribed fire can reduce fuel loads and create shaded fuel breaks, which can help to prevent high severity wildfires from spreading to remaining old growth forests. We took billions of board feet out of western forests, a small reinvestment of funds seems fair.