

Data Submitted (UTC 11): 1/26/2024 4:10:27 PM

First name: Uriah

Last name: St John

Organization:

Title:

Comments: Old growth trees and forests are important components of National Forest ecosystems, and we appreciate the USFS effort to create a consistent approach to protecting and managing old growth trees across our national forest system. Young, early seral forests are also important to the environmental community, and we encourage the USFS to ensure that the value of early seral forests is recognized in the plan amendment process. Fortunately, as proposed, the forthcoming Forest Service changes are thoughtful and would enhance the agency's ability to maintain old growth stands through active stewardship-allowing for restoration to maintain forest resilience and to reduce the threat of uncharacteristic wildfire. The changes would also provide space for young growth restoration projects in areas of our national forests where old growth is not present.

As you move forward with the nationwide amendment to create consistent management direction for old growth forests and other forest types, please consider these important comments to advance healthy forests on our public lands.

* Promote forest diversity and recognize that forests are dynamic. Young, middle-aged, and old forests across landscapes provide habitat for multiple species and their life cycle needs. To do so, we must view forests as dynamic collections of important seral states. Forests are healthiest when varying forest ages are interspersed across landscapes, from young forests to old growth.

* There is broad agreement that active forest management is necessary to reduce risks posed by wildfire, optimize carbon outcomes, improve wildlife habitat, safely restore fire to fire-adapted forests, and restore impaired ecosystems. The challenge is how to manage these landscapes at the scope and scale that will address the increasing need.

* The Forest Service must conduct more vegetation management on larger geographic scales to restore forest health and promote resilience, which includes an ecologically appropriate abundance and distribution of mature and old growth forests where those traits are lacking.

* The old growth inventory and analysis of threats completed by the USFS found that mortality from wildfires is currently the leading threat to mature and old growth forests, followed by insects and disease. I support management efforts that focus on science-based restoration and wildfire treatments to reduce the risk of catastrophic wildfire in mature and old growth as well as other forest types.