

Data Submitted (UTC 11): 2/1/2024 2:29:01 PM

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Comments: Dear Chief, 2/1/24

I am encouraged by the shift in language and intent related to old-growth forests on national forest lands in the United States which is due to the Biden Executive Order (14072). Letting go of some of the multiple-use strategies of the past will be necessary to protect older forests on national forest lands in this time of climate change.

Specific concerns have come up in relation to the Land Management Plan Direction that was released in the Federal Register in December of 2023. These include:

1 - vegetative management in old-growth areas should be done on an ecological basis and economic factors should not be the primary purpose of management activities. Exceptions like reducing wildfire fuel hazards in forest communities that are prone to significant fires are acceptable. However, this executive order should not allow exceptions like local forest managers practicing 'ecologically appropriate' management that involves a) regeneration of old-growth forests due to inferred senescence or b) the creation of early successional habitat for certain wildlife species.

2 - there are concerns that this executive order may be too closely related to management plans and their problems. There are also concerns about whether this executive order has the legal weight to protect old growth on the ground when it is found.

3 - this executive order should remove pressures for commercial logging in old-growth areas or stands. Keeping old-growth forests intact should take precedence over rationales and exceptions in management activities alluded to above.

4 - each national forest needs its own regional strategy for old-growth forest conservation. This includes identifying areas prioritized for old-growth retention, and being open to credible work that has been done by USDA research stations and qualified researchers outside the agency.

5 - effort needs to be put into identifying areas that can mature into old-growth forests, and getting clear about the quantity of areas of this kind that can play a role in carbon sequestration.

6 - practices of old-growth evaluation need to improve, and forestry practices that do not seriously interfere with carbon sequestration, such as those recognized by Professor Bill Keeton of Vermont, need to be considered.

It is encouraging that the US Forest Service is proposing the establishment of a National Old Growth Monitoring Network. Ecologists, dendrochronologists, and old-growth catalogers should be involved in this process (which was not the case in the first decade of the 2000's). Efforts to catalog and understand old-growth forests in the eastern United States are ongoing and deserve to be part of a national network of this kind.

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