

Data Submitted (UTC 11): 2/2/2024 7:04:50 AM

First name: Paul

Last name: Wagner

Organization:

Title:

Comments: Old Growth & Mature Forests

In the process of protecting OG, tree species, fire, windstorm and wood products use need to be considered.

There are OG stands where ingrowth of non-fire-resistant tree species has created conditions that lead to catastrophic fires that will kill all trees in a stand. The ability to harvest or clear trees to make some OG stands more fire resistant, healthy and resilient needs to be clearly part of any plan. Tree diameter limits should not be considered when non-fire resistant trees have grown into a stand in a frequent fire environment.

When fire or wind mortality events occur, trees that can be harvested and utilized should be if roads are available nearby. Any plan needs to consider the availability of wood products for human use and make it less cumbersome to utilize mortality under reasonable circumstances.

For "mature" stands, the April 2023 | FS-1215a publication with definitions is a good starting point. Simple age is not. Regarding the Northwest Forest Plan, some of these stands will and are planned to transition into old growth. The mature definition and plans using that term need to be clear about structural or other conditions that make them suitable for adding to or replacing stands of OG.

Overall, on a landscape scale the Forest Service & BLM need to be providing the full spectrum of forest conditions, including early serial or complex early serial. Reasonable percentages of all ages of forest should be maintained.

Planners need to consider that people have managed our landscape since time immemorial and that European diseases may have killed up to 90% of the first people. What we now see as forest conditions do not reflect past forest conditions. Traditional Ecological Knowledge needs to be considered in management plans and objectives. Opportunities for first foods and use materials need to be provided for without encumbering analysis. Specific CE's or a programmatic should be part of any plan or direction.

Above all, management for objectives, including timber for wood products useful to society needs to be part of any plan.