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Comments: I write to urge protection of old-growth forest in two circumstances: 1. Cryptic old-growth. This is old-growth that lacks majestic tree sizes because sites are low productivity or because they are frequently disturbed by natural processes like fire and floods. The US Forest Services recent criteria for identifying mature and old-growth forests, based on models like the culmination of annual increment were a very good step, because it allows different forests to be identified with different criteria, based on statistical analysis of structural features. To be effective, this must be further developed, but it goes in the right direction. 2. The second issue is forest continuity, in addition, to current or future structure. All forests will someday be disturbed. When a forest is designated as old-growth it should be retained in protected status despite the successional dynamics that result from disturbances. We need to view forests as a dynamic ecosystem, in which individual patches pass through successional stages, a perspective called the patch dynamic perspective. Thus an old-growth forest now should be retained in that protected category even if subject to fire, hurricane, or flood in the coming years. What is "old" in such cases, at least early in succession, is not the dominant trees but rather the ecosystem itself. Such forests patches can retain carbon in wood debris or in the soil, and, compared to logged stands and second growth, they can retain soil organisms and soil structures that are a function of age. Studies of successional history should be done, in addition to studies of current structure. By continuity, I mean places that have been continuously forested back several generations of dominant trees and into times before European settlement.