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Comments: I oppose the plan to prioritize old growth Forrest's for the following reasons,

-Reduced Timber Production and Economic Impact-

- Timber Industry, New-growth and managed forests provide a consistent source of timber, which supports local economies, jobs, and the production of wood products. Old-growth forests are often off-limits for timber harvesting, reducing the supply of valuable hardwoods and limiting economic opportunities.

- Sustainable Harvesting, Managed forests can be sustainably harvested in cycles, balancing ecological health with economic needs. Promoting old-growth forest preservation may reduce the amount of forestland available for this type of sustainable use.

-Habitat for Species that Prefer New-Growth Forests-

- Biodiversity in Young Forests, Certain wildlife species, such as ruffed grouse, white-tailed deer, and various songbirds, prefer new-growth or early-successional habitats. If old-growth forests dominate, the habitat for these species may diminish, leading to declines in their populations.

-Ecological Balance, A forest landscape that includes both old-growth and new-growth areas supports a wider range of species. Prioritizing old-growth creation may disrupt the ecological balance by over-emphasizing one habitat type.

-Fire and Forest Health Management-

- Increased Fire Risk, Old-growth forests, with their accumulation of dead trees and dense vegetation, can become more vulnerable to catastrophic wildfires. New-growth forests, when managed properly, may be less susceptible to these risks due to more active thinning and controlled burns.

-Forest Health, Actively managed new-growth forests can be more resilient to pests and diseases. Old-growth forests, left largely unmanaged, may become more susceptible to widespread infestations, like bark beetles or invasive species, which can threaten both the forest and adjacent areas.

-Recreational and Access Considerations-

- Recreational Opportunities, Managed, new-growth forests often offer more recreational opportunities such as hiking, hunting, mountain biking, and off-road vehicle access. Trails and infrastructure can be more easily maintained in new-growth areas, where forest management practices allow for the construction and upkeep of recreational facilities.

- Accessibility, Old-growth forests are sometimes more difficult to navigate and access, limiting certain types of

recreation and tourism that rely on easier access, such as camping and wildlife viewing.

-Slower Carbon Sequestration-

- Carbon Sequestration, Younger forests generally sequester carbon more rapidly than old-growth forests, as younger trees grow quickly and absorb more carbon during their growth phases. While old-growth forests store large amounts of carbon, their slower growth means they sequester less carbon on an annual basis compared to new-growth forests. This can be a consideration in managing forests for climate change mitigation.

-Loss of Management Flexibility-

- Active Forest Management, National forests are often managed for multiple uses, including timber, wildlife, recreation, and conservation. Encouraging old-growth development could limit management flexibility by restricting activities like logging, prescribed burns, or forest thinning that help meet a variety of ecological and human needs.

- Adaptive Management, Forests are dynamic systems, and some argue that adaptive, active management-including the creation of new-growth forests-is more effective at addressing issues like fire risk, pests, and changing climate conditions than letting forests grow unmanaged.

To reiterate,

My argument against prioritizing old-growth creation in national forests emphasizes the economic, ecological, and practical benefits of maintaining a diverse mix of forest ages and types. Proponents of this argument suggest that a balance of old-growth, new-growth, and managed forests better serves both human and ecological needs, from economic activity to wildlife diversity and recreation.