

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

First name: David

Last name: Atkins

Organization:

Title:

Comments: As a forest ecologist and forester who did my master's thesis on the definition of OG in mesic forests of N. ID and northwest Montana, managed land as a certified silviculturist and is a current forest owner, I submit the following comments:

* Climate change and fire suppression in combination have provided and will continue to put extreme stress on old growth forests at the stand level and are often at risk at the landscape level as the result of the continuous cover of dense, mature forests that surround them. The risk of severe wildfire or insect outbreaks that may overrun the old growth stands requires active management to reduce both stand level and landscape level risks to protect and recruit old growth.

* Most old growth forests are borne from and maintained by disturbances of low to moderate severity. In the western US this is most commonly as a result of fires.

* Your technical silvicultural guide lays out the appropriate thought process to diagnose the current conditions/risks and then identify if any action is needed and if yes what those actions are.

* Mature forests as a category should not be set aside from management, especially with the objective of protecting carbon stores as some groups are advocating. Millions of acres of mature forest are at risk of wildfire and insect outbreaks as other analyses have identified. Given the continued warming and drying as a result of climate change, necessitates active intervention with harvests and prescribed burning to reduce the forest density, favor species that are more resistant to wildfire and insects. Such treatments will provide more resistant, resilient and adaptive forest conditions. Treatments need to include regeneration harvests that will provide early successional habitat for plant and animals dependent on this successional stage of the forest. In addition young forests that have had proper fuel reduction resist wildfires for 1-3 decades. In many western forests the mature component of the forest is over represented. The need for appropriately designed treatments to create conditions that will facilitate recruitment of OG in some of the mature stands is needed. That will often require harvest and prescribed fire.

* Harvest and utilization of the trees in a variety of wood products are important climate mitigation. Wood products have two important carbon/climate purposes. First, carbon is stored in the wood products for the life of the product. Second, the use of wood products for substitution of fossil carbon intensive products, avoids the emissions that is associated with their production. Wood used in place of concrete, steel, aluminum, brick, etc in construction has significant immediate carbon mitigation benefits. You can reference FS, academic and nonprofit Life Cycle Analysis publications to substantiate this. The alternative is a large pulse of carbon release by a wildfire and then continued release for decades after as the trees rot and release methane and CO₂.

The preferred alternative provides good flexibility for site specific evaluation and management. Restricting the management tools and discretion available to local managers is not good for protecting the biodiversity values of OG, is not good for carbon retention and not good for watershed protection.

To achieve the goals of the Executive Order, managers need flexibility. Monitoring and research will continue to provide new information to inform management techniques as the decades pass. Don't for close options with too restrictive guidance.