This is an addition to the scoping comments I dropped off at the ranger station 16 July 2019 - I had time to visit the planning area - hiking around units 9149, 2656 & M2. I found some truly astounding legacy / old growth trees of various species - cedar, ponderosa pine, douglas fir - with excellent complex branch / canopy structures, oftentimes broken tops, in diameters from around 40" up to 63".

I am concerned that these irreplaceable trees will be removed - specifically I am concerned how their removal may affect species dependent on their structure. Please analyze for potential effects to red tree voles, goshawk, marten, pacific fisher, sensitive fungi including Agarikon. We found an old snag with several huge Agarikon conks which are very slow growing and exclusively live in dense doug fir old growth.

We saw many rocky ridgetops which likely provide special habitat to cougars and other species - dens, perches. We saw a vulture nest with a vulture chick in it - in unit 2656 on a rocky ridge. I have concerns that logging around these rocky ridges could cause them to become unstable, or too exposed. I have concerns that due to the ashy / rocky soils on these ridges,

(1)

the proposed cutting would permanently scar the land and it would be unable to recover to its present state. Please analyse the likelihood of failure of regeneration in these areas. Please analyse for effects on species using rocky atrops as habitat.

There is a forest-wide defecit of dense/closed canopy old growth and it appears that much of the proposed units have these conditions- Please analyse the cumulative effects of reducing canopy cover here with the context of already low late seral closed canopy forest. Please disclose the scientific controversies surrounding habitat value of closed canopy old forest and downward trend of " " " " extent.

The most concerning issue to me is of course the global issue of climate change driven by greenhouse gases. Please analyse fully 1) the amount of Carbon ~~dioxide~~ stored currently 2) the trend of how that would change without management 3) the amount which would be released into the atmosphere under proposed action. Please disclose scientific controversies surrounding how old forests store carbon.

Cumulative Impacts analysis is critical when it comes to fully considering climate change impacts. Please analyse global effects of climate change and greenhouse gas emissions, then analyse the role of forest management actions within that, then analyse how this projects effects contribute to forest management's cumulative effects.

It is not acceptable to me for you to deem that this project has "no significant contribution" to climate change merely because of the scale differences. Cumulative

(2)

Impacts is the mechanism to account for this. Please analyse the role of old forests in general and this forest in particular in mitigating climate change by storing carbon.

Please disclose scientific controversy on the cumulative effects of projects of this scale. Informally, I urge you to understand that your management decisions do have effects on grand scale, that to hide behind a compartmentalized understanding of the challenge of climate change is deeply flawed.

Please consider adding to the purpose and need the goals of preserving and increasing this area's carbon storage.

Finally, we saw the M2 unit of "meadow restoration" and it was functionally already a meadow- no seedlings or saplings were growing within it. We saw no encroachment of conifers. A few mature trees were struggling to survive within the open area - due to poor ashy rocky soils they were succumbing to natural mortality. We saw a large oak which had toppled over. There were very few shrubs, except there was milkweed present. There were no exotic weeds, thus no weed treatments needed. Please drop this unit and all others ~~to~~ in the same treatment type which have already met your desired condition. It cannot gain anything from treatment.

We found 2 springs in unit ~~9419~~ 9147 and a flowing stream. Please give these 200' no cut buffers in order to prevent sedimentation or effects to aquatic life. Please analyse + survey all other units for flowing surface water & springs & give them similar no cut buffers.

Sincerely, Cooper Ogle