**Old Growth** – LRC Comments

Drafted by Dave Atkins

As the Plan Revision Assessment (p. 84) indicates, the trend for old growth on the LNF is declining. The major causes of this decline are from wildfire and high levels of insects and disease outbreaks driven by climate change. As the LRC emphasizes throughout our comments to the Revised Plan, the decline of old growth reinforces the urgency of landscape scale treatments and an acceleration of the pace and scale of active vegetation management and the application of prescribed fire. The current Proposed Action is not sufficiently responsive to this urgent need for change to protect the values at risk.

To start, it is important that the dynamic nature of the creation and maintenance of the different types of OG in the northern Rockies is described to generate broader understanding of the complexity of the old growth issue. If we are to maintain existing stands and work to create new stands across the landscape, these dynamics must be articulated more clearly. For example, the LMP does not distinguish between OG on warm dry forest types or mesic or high elevation spruce basins or high elevation cold dry whitebark/lodgepole pine OG. Management needs to maintain, recruit and sustain OG across these four forest types are very different and need to be addressed based on their ecology and the context within which they grow. The role of OG in carbon budgets also needs to be described. While OG accumulates large amounts of carbon over time, it is not a uniform linear progression. Additionally, insects, disease and fire may result in significant pulses of carbon release in mature and OG forests, such that carbon and biodiversity interactions are nuanced and complicated. The LRC believes it is important for the LNF to describe and incorporate these details in the LMP and assessment.

Repeatedly the assessment and LMP talk about connectivity (FW-OG-DC-02, FW-OG-STD-02, FW-OG-GDL-01, App 3-9) but it doesn’t discuss or acknowledge that with the exception of PP OG in the warm/dry PNV the extent of OG across the landscape was relatively small and has always existed in disjunct patches, some relatively small (<10 ac) to relatively large (1000+ ac) in the other PNV’s. We think this notion of connectivity needs to be re-examined and placed into context with the PNV ecological context. We believe the small patches scattered across the landscape are important for plants and animal species to “island hop” across the landscape. This re-enforces the need to address OG by PNV.

We think Appendix 3-9 has some good discussion about methods to treat adjacent forests to reduce fire hazard to reduce the fire severity or reduce the potential for I&D outbreaks into the adjoining OG. We think some of these should be incorporated into guidelines in the LMP or at a bare minimum reference the appendix discussion in the section on OG. On A3-10 there is an important “possible action” identified saying during fire suppression the tactic of burning out islands of green vegetation is undesired. We think this should be a guideline moved into the LMP. These islands of great recruitment opportunities for future OG.