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Organization:

Title:

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Ecosystem Management Coordination

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Washington, DC 20250

Regarding: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356, amending all land management plans for units of the National Forest System to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions.

Dear Sir/Madam:

I support the proposal to amend all Forest Plans in the NFS to conserve existing old-growth forest conditions and to provide old-growth characteristics in certain mature forests.

I served as the Forest Ecologist on the Chequamegon-Nicolet National Forest (CNNF) for over 30 years. During that time, I was responsible for a Forest-wide field inventory to identify old growth and the best potential future old growth, and designed a conservation approach for their management and protection.

Most, but not all, of the sites identified during that process were placed in an Ecological Reference Area Network composed of the following: Management Areas 8E (Research Natural Area or CRNA), 8F (Special Management Area), or 8G (old growth and natural feature complex). I encourage the CNNF to build upon the Ecological Reference Area network as they move forward in this process.

In addition, I think the approach used on the CNNF could be adopted by other Forests, especially those in the Lake States, as they develop the Management Approach required by this Plan Amendment.

On all Forests, I strongly encourage the use of a natural community-based field inventory to identify old growth and potential old growth. database queries alone are not sufficient.

Finally, on the CNNF, and across the Eastern Region, existing old growth stands, and high quality near-old growth stands, are exceedingly rare and should given full protected status (longer than the lifespan of a Forest Plan).

Sincerely,

Linda Parker

Ecologist

ATTACHMENT: Parker OG comments.docx is letter content.