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Title:

Comments: My name is Ronald Rhew. I am a retired biologist, previously with the U.S. Fish and Wildlife Service, and over the years I worked on many land management issues with the Bureau of Land Management, from grazing to evaluating the potential effects of large management plans such as the Northwest Forest Plan (NFP), and the Interior Columbia Basin Ecosystem Management Project (ICBEMP). I was the overall lead for section 7 consultation for both of these management plans regarding their potential impact to listed bull trout (*Salvelinus confluentus*). I also completed consultations on activities potentially affecting the Warner sucker, Oregon chub, Lahontan cutthroat trout, and other listed species, primarily aquatic species. I am very familiar with how public lands are managed, especially in Oregon, and the intermountain west.

I am pleased to see the Forest Service engage in an effort to protect mature and old-growth forests. Your document states that one of the challenges you face is [ldquo]how to maintain and grow older forest conditions while improving and expanding their distribution and protecting them from the increasing threats posed by climate change and other stressors, in the context of its multiple-use mandate.[rdquo]

Based on my years of professional experience, I feel obligated to note that one of the main factors inhibiting achieving these goals has been management itself. Especially in western forests and grasslands, the push to [ldquo]maximize the yield[rdquo] resulted in efforts to rationalize extracting timber, forage, minerals, and oil and gas, at the expense of other resource values that benefit the majority of Americans, such as clean water and air, fish and wildlife habitat, watershed functioning, and sequestering carbon as a buttress against the ongoing and increasing impacts of climate change. For example, the ICBEMP noted the correlation between road density and the health and diversity of native aquatic species. Road densities in western Oregon forest are much higher. Further, management that replaced intact native forest with managed Douglas fir plantations, primarily through clear-cut logging practices, has reduced forest[rsquo]s resilience to disturbance (not to mention the diversity of tree species in forest stands), and increased the frequency and severity of wildfires across the west. Importantly, the extensive road network increases access to public lands where many of the human-caused wildfires originate, not to mention the massive impact to hydrologic functioning. Obviously, one of the best ways to protect mature and old-growth forests and establish old forest conditions is to stop cutting the remaining old forests down. The Forest Service and BLM have targeted at least 370,000 acres of mature and old-growth forests for logging that are on the chopping block now. Under the Northwest Forest Plan, the most vulnerable old-growth and mature forests are contained in the matrix land allocation. Those areas should receive the soonest attention

Your request for information also states the question; [ldquo]given our current understanding of the threats to the amount and distribution of mature and old-growth forest conditions, what policy, management, or practices would enhance ecosystem resilience and distribution of these conditions under a changing climate?[rdquo]

* Logging is a huge contributor to climate change. End logging Old Growth and Mature forests as soon as possible.

* Protect landscapes, especially old growth and mature (MOG) forests, quickly for conservation purposes.

* Include carbon sequestration as an output from national forest lands.

* Allow only climate sustainable logging (preserving more carbon). This means protecting the largest trees, using selective logging, avoiding clear-cuts, and using longer rotations for more carbon uptake. These will all improve land health for water, biodiversity and fire resilience. It will also produce more timber.

* Encourage reducing soil erosion which holds 40-50% of carbon in forests by avoiding steep slope logging, and clear-cut logging,

* Decommission roads; the massive areas they occupy can be added to the forest base.

- * Improve or replace culverts to increase fish access to forested and grazing lands.
- * Restrict free-range grazing and enforce fenced, rotational grazing as much as possible on degraded rangelands.
- * Rely on early (spring) use of riparian rangelands to help restore and maintain fish habitat in rangeland areas.
- * Coordinate with permittees where applicable on coordinated public/private grazing strategies to allow minimal use on riparian pastures during summer months.
- * Identify areas of deforestation and replant them with special attention to riparian zones as a very effective natural climate solution and benefit to limit soil erosion and increase in-stream habitat quality
- * Thinning the forest should only take place around sensitive areas, including human occupation, recreation, areas of indigenous importance.
- * Carbon sequestration should be established as a goal of all management activity.
- * Define restoration for each ecosystem. This has already been done with the departure from historic vegetation data set from the ICBEMP.

Thank you for the opportunity to comment. I will anticipate and evaluate the actions to follow.

Sincerely Ron Rhew

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