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Organization: Town of Ophir

Title: Ophir Environmental Commissioner

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To the Honorable Randy Moore, U.S. Forest Service Chief,

The Town of Ophir is delighted to see the Forest Service propose a forest plan amendment to promote retention of old-growth. The proposed action represents a cognizance of the value and importance of old-growth forest ecosystems and is long overdue.

The proposed amendment is a start at protecting ecologically critical old-growth ecosystems that currently exist on our national forests. However, the amendment needs to be strengthened, especially to ensure that future old-growth will be allowed to develop and be retained as old-growth.

Old-growth Forest ecosystems will be more important than ever in the face of climate change. These ecosystems are cooler and more moist than most other forest stages. Thus old-growth areas may be needed for climate refugia for many species of wildlife and plants. Also, retaining older forests, which usually have the largest trees, will be a critically important element in the battle against climate change, as old-growth ecosystems constitute the most efficient carbon storage mechanism available. In addition to the living tree carbon, over time old-growth accumulates large amounts of carbon in the soil and woody debris which will accumulate more rapidly when allowed to decompose on the forest floor.

Our town is lucky enough to be surrounded by old-growth and mature forest on Forest Service land. We strongly believe that "management" of this precious ecosystem is best done by leaving these ecosystems to flourish without human interference and with regulation of high-impact human recreation and use. We agree with the proposed desired condition 1, 88047

The amount and distribution of old-growth forest conditions are maintained and improved relative to the existing condition over time, [hellip]

A major objection we have with this amendment, as well as the recently revised Grand Mesa Uncompahgre And Gunnison National Forest plan, is the significant increase in forest service land designated as suitable for timber and/or appropriate for fuel reduction treatments.

Manipulative management of old-growth is likely to remove and/or damage ecological elements, specifically old-trees (which are the targets for removal to feed the timber industry); natural soils (which are compacted by heavy equipment used in logging); understory vegetation (often destroyed by logging equipment or even deliberately removed or burned during fuel reduction activities); and importantly the introduction of non-native plant species which can quickly displace the diverse native species. Prescribed burning, if applied incorrectly or too frequently, would damage or destroy understories of trees and other vegetation, which are an important characteristic of old-growth ecosystems.

To make logging more attractive to industry, the Forest Service frequently includes large trees in the timber offered from fuel reduction and other vegetation management projects. These are the grandmothers of the forest and the very trees most in need of protection and retention to conserve old-growth.

The proposed standard 2(b)(i) would allow a large area of national forest land to be treated for fuel reduction, which could easily involve some old-growth ecosystems and jeopardize the old-growth character.. We disagree with the language that tree cutting and removal is only a "minor threat" to old-growth. Stronger language is needed in the amendment to ensure that old- growth ecosystems will not be treated unless immediately next to communities and infrastructure.

Although leaving old-growth forests alone is the best practice to ensure the character of the old-growth forest conditions there are a few exceptions to the prohibition of treatments we would like the forest service to implement:

- Removal of non-native species, when such species are a potential threat to ecosystem integrity. The latter could occur when a rapidly-spreading non-native plant species or exotic wildlife or fish species threatens to displace or already has displaced native plant or wildlife/fish species. This can likely be conducted without degrading old-growth character. However, herbicide use to combat non-native plants might have to be limited to conserve native plant biodiversity.

- Removal of roads and rehabilitation of roadbeds. Roads are very detrimental to old-growth ecological characteristics such as wildlife habitat effectiveness, soil quality, and watershed integrity, and facilitate too much human use. Removing and revegetation of unneeded roads in old-growth ecosystems should be a priority.

- Regulating human use. Recreation, motorized recreation, high-impact activities and/or large numbers of people, can damage old-growth ecosystem functioning by adversely affecting water quality, wildlife habitat and effectiveness, and soil quality. Human use should be regulated as needed to ensure that old-growth ecosystems and the ecological integrity are maintained.

Finally, we strongly believe there must be no exception for protection of old-growth in Alaska.

The following exception to standards in the proposed amendment must be deleted:

4. Exceptions to standards 2 and 3 may be granted by the Regional Forester in Alaska if necessary to allow for implementation of the Southeast Alaska

Sustainability Strategy and the rationale must be included in a decision document.

The Tongass National Forest in Alaska has been heavily cut in some areas over the past decades, but it still contains sizable areas of intact rain forest. It is a remnant of the once vast area of rain forests in the Pacific Northwest in the U. S. and Canada. Old-growth in this region is at least as important as it is anywhere else, and it must be protected.

Cutting old-growth cannot be "sustainable", as it would take centuries for treated areas to return to old-growth if it even can occur at all. If implementation of the Sustainability Strategy requires cutting of old-growth, then the Strategy itself is inappropriate and must be modified or rescinded.

In conclusion, we appreciate all of the efforts being done to protect the ancient trees in the existing and future old-growth forested ecosystems and to retain them across the landscapes of the national forest system. However, the proposed amendment must reflect the ecological reality that old-growth, existing and future, is best left alone to be retained as, or develop into, old-growth. The exception for Alaska must be deleted from the proposed amendment.

Sincerely,

Town of Ophir

Attachment: Old-Growth Forest comment Ophir (1).docx is the comments.