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Comments: Comments from Sierra Club Illinois Chapter are attached

Illinois Chapter Sierra Club

Shawnee National Forest Committee

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Old Growth Project Comments:

<https://cara.fs2c.usda.gov/Public//commentinput?Project=65356>

RE: National Old-Growth Amendment

To Whom It May Concern:

While the Old-Growth Amendment (amendment) proposed in response to Executive Order 14072 is still in its planning stages, we appreciate the opportunity to comment in response to the meeting held by the US Forest Service in the Shawnee National Forest (SNF) and to the literature handed out there. We understand that this was the only meeting of its kind east of the Mississippi River, and while we are pleased by the degree of attention given to our beloved forest, and to the high level of administrative staff at the meeting, we find the lack of attention given to other eastern forests disturbing and indicative of a larger problem.

In theory Sierra Club Shawnee National Forest Committee strongly supports efforts to protect old-growth

ecosystems of any kind. Of course, it is the details that matter. The statement of purpose contains valuable plans and suggestions especially in the emphasis on local strategies, but certain elements in it betray greater emphasis on western vs. eastern forests and woodlands. Most (not all) eastern wooded ecosystems are not typically prone to "wildfire crisis" and "hazardous fuel build-up" and do not need improvement in their resistance to wild fire. In fact, to "improve their resistance to [hellip] insects and disease," they need fire. The current ability of the Shawnee National Forest staff to provide enough controlled burns is severely limited by an inadequate budget, which is unfortunate given the high degree of knowledge and skills of the fire crew.

The SNF, along with other eastern wooded ecosystems, suffers greatly from invasive species and excess shade. It does not need "management restrictions on mature forests," and we hope that the need to manage and control those problems will be recognized in future documents. We suggest that ecologists and botanists from all the eastern national forests be consulted in detail on the management needs of their forests.

The national policy of Sierra Club "supports restoring naturally self- sustaining networks of wild forests for every forest ecosystem. Where forests have been damaged or fragmented (such as in the Shawnee Forest) we call for the restoration of the ecosystem with native plants and animals[hellip]"

In relation to this, we would like to see answers to the following questions addressed in proposed old growth plans in our national forests:

- * What is the definition of "old growth" as it applies to Shawnee National Forest?
- * Is there a minimum size for an "old growth" stand?
- * Can an individual tree be considered as an indicator to aid in identifying an old growth management unit?
- * Will the plan contain a prohibition against cutting "old growth" trees except in the case of disease or safety?
- * There should be incentives for managing old growth such as grants for individual forest projects. What incentives will be used?
- * How much extra funding will be provided for the essential monitoring of old growth stands?
- * Will the old growth plans respect the distinctive plant communities in SNF and develop specific shade reduction and invasive species control for each one?

The Department of Agriculture should provide substantial extra funding to the Forest Service to carry out the "Old Growth" mandate.

Sincerely,

Illinois Chapter Shawnee National Forest Committee

Cc: Michael Cheveas, Superintendent, Shawnee National Forest;

Dennis Wilson, District Ranger, Shawnee National Forest

ATTACHMENT: Sierra Club Illinois Chapter Comment Letter