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Comments: I am a retired federal trust land forester with an M.S. in forest ecology and memberships in the Forest Stewards Guild and the Society of American Foresters. The last 17 years of my forestry career I worked on three Indian Reservations in northern Wisconsin. I now volunteer work for the Citizens' Climate Lobby chapter in my area and participate in CCL's state agriculture and forestry committee.

Comments:

1. I recommend wording that old growth stewardship for existing old growth and mature forest transitioning to old growth include language that is prejudiced against management (logging, etc.) in favor of relying on natural forest processes to maintain or develop old growth structure and function. (See attached article for support of this comment.)

2. Resources directed at old growth development and maintenance should be prioritized for such forest that best stores and/or sequesters carbon. All forest depends on a climate that allows trees to flourish.

3. Besides opportunities for fostering old growth and carbon capture, resource prioritizing should also weigh a) chances for wildlife (plant, animal, microbe) connectivity with other old growth; b) climate resilience of target old growth forest types; c) rarity of old growth forest type; d) natural and future range of variability; e) remoteness from human impact and avarice (low merchantability, inaccessible); f) available refugia for threatened old growth types.

4. Inventory of old growth and mature (potential old growth) should account for below ground carbon capturing potential (including sequestration and pooling at and below the surface, hardpan and beyond).

5. Some portion of normal stand forest development funding should go toward developing old growth character in young forest stands or in discrete sites in developing stands (dyads), both for experimental purposes, forest health, and for promulgation to recruit new mature stands into mature forest with old growth potential.

I would expand my comments with the attached analysis from the Forest Service Employees for Environmental Ethics in their summer issue of Forest News.

Thank you!

ATTACHMENT: FSEEE Analysis.docx