

Data Submitted (UTC 11): 7/17/2019 8:44:39 PM

First name: michael

Last name: garvin

Organization:

Title:

Comments: I have seen no mention of the Molalla tribe, and their frequent burning of oak/ponderosa savanna, or the likelihood that the meadows were generated by them, or at least maintained after a natural fire occurred, and that the loss of meadow is more the natural reclamation by Douglas fir due with the decline and removal of the Molalla than fire-suppression. That would change the purpose and need to enter native (old) stands from addressing 'over-stocking' due to fire suppression to some desire to maintain an unnatural forest-scape that requires constant low-intensity fire to exist.

Also, and I speak from professional experience as a climber and saw-topper who has been contracted by the GPNF, the WNF, and other forests, to 'trim the sails' after the canopy of an older forest has been opened considerably, that said thinning leaves trees used to the larger forest acting as a wind shelter prone to frequent wind-throw, as was experienced in the Jim's Creek Project. These close-grown trees do not have the broad root wad to maintain them as they stand more alone.

I think the purpose and need to enter these older stands is more honestly to access older, larger diameter trees for the market. It is a significant net carbon loss in the world of climate change and carbon sequestration, and has no provision to guarantee the frequent controlled fire required to maintain the savanna that is the purported motivation for a lot of this.