

Data Submitted (UTC 11): 12/22/2023 9:41:40 PM

First name: m

Last name: c

Organization:

Title:

Comments: More clear definitions of old growth would be helpful in understanding the intent of the document. I live in R6 and some "definitions" for old growth were ridiculous. With in the NWFP area, Douglas-fir forest type was listed as being old growth if it had a minimum standard of 3 29.5 inch trees. I know the NWFP places limits on treatment, but one coworker interpreted this definition to mean that leaving 3 large legacy trees per acre and clear cutting the rest (and leaving one large snag) would preserve the old growth status of a stand. Three trees and one snag barely qualifies as a shaded fuel break. I say this to illustrate the confusion and uncertainty of these definitions. I tried reading deep into the definitions and they say minimum standard and reference an OGS (old growth structure index) score. If the OGS is how you define old growth, then it was not defined well, and the chart of minimum standards may lead to confusion and disappointment in the final product is not what people thought they read in these preliminary documents.

Also to this same point, how is mature defined? I did not see this mentioned. I appreciated the definitions that included stand age or tree age. I partly feel this is a bigger key factor in assessing old growth that tree characteristics. Again to the PWN. A Douglas-fir reaching 29.5 inches (the minimum size) is a relatively short time period compared to trees growing on the east side of the cascades. Some definitions addressed this with productivity but the NWFP area seemed to rely on the NWFP document for a definition. This may make sense except that document is also being revised, and ideally its definition of old growth should be considered in light of the most recent data.

One final concern regarding the definitions. There were a few associations that my ecology background would never consider old growth, such as lodgepole. I wouldn't consider these early seral species as old growth, because their typical short life span and regeneration strategy is heavily dependent on disturbance. For lodgepole it is dependent on fire because they have a serotinous cone and to regenerate they typically need full sunlight, which is also provided by an intense disturbance. If we are managing it as old growth where fires are not stand replacing, then they will eventually die off and be replaced by later seral species like fir, hemlock, and cedar. Other early seral species like ponderosa pine make sense to manage for old growth because they weather the low and intermediate intensity fire and are capable reseeding in and the fire regime actually removes the later seral competitors creating a stable condition for the ponderosa and its other associates to remain climax.

Another major concern is the implementation of this document. Press releases suggest this EIS is intended to facilitate management of old growth management for sustainability which is great and important. The biggest danger seems to be fire. Will the EIS be directed at removing current red tape to allow better adaptive management or at least responsive treatments in a timely and cost efficient manner. Agencies have a lot of analysis to complete and very limited human hours to conduct it.