

Data Submitted (UTC 11): 1/24/2024 8:16:04 PM

First name: Buddy

Last name: Rose

Organization:

Title:

Comments: These comments apply mostly to the Gifford Pinchot National Forest, but I suspect much of information and data would be similar within the other PNW Region forests covered by the NW Forest Plan. One of the basic goals of the NW Forest Plan is the restoration of Old Growth with the assumption that past harvest has severely depleted that resource to the detriment of dependent or associated species. Using a definition of Old Growth often referenced by renowned forestry professor Jerry Franklin, from the University of Washington (and my personal observations), Old Growth characteristics are predominately found in stands 250 years and older. Based on information on stand ages and stand mapping, it appears likely that, prior to large-scale harvesting in the GPNF in the 1940s, there was no more than about 25 percent of stands greater than 250 years of age. That was primarily due to past fire activity. Reviewing current stand age distribution within the GPNF and based on the fact that little or no harvest of stands 250 years of age or older has taken place since the 1990s and is not likely in the near future, there will be as many acres of stands 250 years or older within the next decade or two as there was in the 1940s before large-scale harvest began. The distribution will obviously be changed but, based on research I have seen, the amount of habitat is more important than distribution to most species associated with Old Growth. What has been missing in the NW Forest Plan is a stated goal (acres or some other measure) for restoration of Old Growth within specific forests or areas, not just a general statement. Otherwise, how will you ever know if you've attained that goal? A goal of restoration of Old Growth with no endpoint will eventually produce conditions that may have never existed in the past. That would likely lead to large-scale catastrophic fires or stand-replacing events or pathogens.