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First name: Karen Last name: Beyers Organization:

Title:

Comments: I would like to comment on this Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356. I greatly admire Mr. Brauneis' expertise and dedication, and have read, and saved, his recent letter about the nature of western old growth lodgepole pine, and performance of ecologically pragmatic, economically sound - stewardship - of forest resources (at cowboystatedaily.com., mid January this year).

Long ago, I volunteered for the Forest Service in 1992-3, Malheur National Forest, in Oregon, as one of a group of seven persons with training useful for a survey project, helping the Forest Service, basically to re-find - stands of ancient, > 31" dbh - ponderosa pine. Working together, we were able to determine, that old and recent aerial photography used for orthophotogrammetric topographic mapping of "islanded" stands of "Designated Old Growth" trees, (enormous age and size, naturally fire resistant and fire-dependent, with long lifespans and unique plant and animal populations), - showed only - holes - where largest groups of the largest trees had been tagged by federal Biologists, for "Wildlife". They were not to have been harvested, but left intact, as a "biological refugia lands" system "resiliency" network, for disappearing endangered species of birds and small predators, like the marten. During the time the maps were on file, these deep-in backcountry stands had been located and retagged by industry cruisers and Timber Sale Officers as "Timber Sale Units", and were being logged. When all was straightened out, the saved stands remained interconnected and functioning, with fast, "light on the land" fire, and clearing of non-native brush allowed, to continue their fire resistance adaptations, and enable natural reproduction and ponderosa- style habitat development. The project Biologists' research went before Congress, and the next year, the state of Washington's National Forests, also east of the Cascade Mountains, also did searches, and also found remaining "islanded" stands to protect. These 2 projects were called "The Eastside Screens", "Designated Old Growth Verification Surveys", 1992-94. - Logging work and businesses essential to the local economies of Oregon and Washington towns within the 2 "Eastside" National Forests, were hit because of the decision to save the ancient trees. I took up work as a contractor company wildland firefighter for 11 seasons, and spent time in forests in the western states - Mr Brauneis' description of stressed overmature lodgepole woods - naturally needing - to be cut down, brought back clear memories of miles of collapsed, burnt black and smoking "dog hair" to clamber over...I totally agree logging can be the best fix, and it's natural, and that it is natural that nothing lasts forever...but please, no landscape scale removal for all places, or for a species of tree, which has a community that lasts hundreds of years, benefits biological diversity, steadies its own environment, rises and falls naturally, and - keeps - rising and falling naturally, if given time. A very slow, big, engine for good.

Please give remaining old growth forests space and time. No road-building unless absolutely necessary. Burn and clear where practical, for protection from wildfire and disease, to start succeeding generations around the old growth for harvest, and for some of the trees to become the future old growth. Leave downed trees to lie where they provide water, food, living spaces. Allow "islands" to stay of a useful size, within reasonable distance of one another for their animal inhabitants, who cannot actually leave, to move back and forth, above and below the canopies.

Thank you for the space to comment.