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Organization:

Title:

Comments: I am writing to submit my public comment on the notice of intent to prepare an EIS to prepare an amendment to create a Land Management Plan for Mature/Old-Growth forests across the National Forest system. I have lived for decades within watersheds and ecosystems managed by the Forest Service. I rely on the health and well-being of Mature/Old-Growth forests for my drinking water. I rely on the forests for clean air, and a climate that can support the continued survival of all beings within the web of life. I frequently work as a volunteer to field-survey proposed actions within Mt. Hood National Forest, and have in-depth on-the-ground firsthand knowledge of the forests and the Forest Service actions. I have been a member for three years of two Forest Collaboratives.

I strongly support the concept of the creation of robust land management plans for stewarding the survival of Mature/Old-Growth forests within the National Forest system.

I have support for some plan elements outlined in the NOI. I have concerns about some plan elements outlined in the NOI.

I fully support areas of potential agreement #1-5, and #8-10.

I have the following concerns about areas of potential agreement #6-7:

*The entire existence of these forests came about through the practice of Traditional Indigenous Knowledge, by tribal communities, since time immemorial. TEK is a source of best-available scientific information, but it is not solely that, nor is TEK a merely an information resource for the Federal government to exploit. I urge the agency to engage with humility and apology in seeking to incorporate TEK into management practices.

*Management direction should not only involve co-stewardship, but also Tribal co-management. Every Tribe, those with and those without Federal recognition, whose current and ancestral homelands are within the National Forest land, have an inherent right to participate in co-management of National Forest lands.

I have concerns about a statement in NOI p 3-4: "Initial analysis from that ongoing effort indicates several key findings that informed this proposed action. The initial analysis found that mortality from wildfires is currently the leading threat to mature and old-growth forest conditions, followed by insects and disease. The analysis found that tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects and disease. However, past management practices, including timber harvest and fire suppression, contributed to current vulnerabilities in the distribution, abundance, and resilience of old-growth forest characteristics."

In this statement, the agency acknowledges that its own practices created the current situation, through wide-scale industrial timber harvest and fire suppression. Currently, these are the same practices that the Forest Service continues to employ, using different vocabulary. Development of an effective Mature/Old-Growth management framework must address this contradiction.

I urge the agency to include in this plan provisions for the inclusion of fire-origin Pre-Forest Stage stands within the definition of Mature/Old-Growth, and to provide robust protections for these stands. The Pre-Forest Stage seral type is even more rare, even more imperiled (often by so-called "salvage" logging post-fire, a practice which must be halted), and even more biologically diverse than the Mature/Old-Growth seral type. Not every fire is an ecological disaster, and not every burned landscape is in need of intervention to accelerate reforestation. Mature/Old-Growth stands that experience fire become areas of unparalleled diversity, even when they experience high-intensity, high-severity fire. Giving emphasis to the ecosystem value of PFS areas is a critical element that must be included in management direction which seeks to re-center the health and diversity of Mature/Old-Growth forest stands.

I have serious concerns about the Exception loophole on NOI p. 18: "Exceptions to this standard may be allowed if the responsible official determines that actions are necessary." This loophole is big enough to drive a convoy of heavy equipment through, which is exactly how it will be used if it is incorporated as written.

I urge the agency to include the following provisions:

- *Allowing no net loss of M/OG acreage during timber harvest.

- *Revised surveying using LIDAR to identify all M/OG areas.

- *Coordination of NWFP amendment with Land Management Plan Direction for Mature and Old-Growth, so that there is agency-wide consistency, and the highest level of protection nationwide.

- *Eliminating Pechman exemption for Survey and Manage in thinning in forest stands mapped as under 80 years of age. These stands frequently include significant areas of legacy living trees and snags, which serve as refugia for sensitive species within these stands.

- *When timber harvest occurs within M/OG stands as part of "forest health" management treatments, final marking of large-diameter trees must be the decision of Forest Service specialist, not the contractor.

- *Incorporate, inventory, and develop protections for Pre-Forest Stage stands which occur as a result of fire within M/OG stands. Recognize PFS stands as a necessary component of landscape-wide ecosystem integrity.

Thank you for your consideration of my comments.