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Comments: Dear Secretary Vilsack,

In response to the scoping initiated for amending all USFS land management plans with direction for Old-Growth Forest Conditions, I present the following comments:

1. Desired Condition 1, Desired Condition 2, Standard 1, and Guideline 1 are open-ended constraints on forest management which require increases of old-growth without upper limits. Therefore, they do not provide for ecological sustainability over time. This linear, rather than cyclical, approach to ecology creates contradictions at several levels:

- a. It creates internal disagreement within Forest Plans which have already established a Desired Condition for the percentage of landscape to be sustained in Old-Growth habitat. The new standards will overrule Desired Conditions presently established.
- b. Ecologically, there is a need for balance and diversification of structural stages across landscapes to protect against landscape-scale disturbance events. An open-ended requirement to continually increase old-growth is not conducive to that end. Oliver and Larson document in their publication "Forest Stand Dynamics" (1996) that large old trees are at greater risk to disturbance. Likewise, they are at greater risk of propagating disturbance. Management for a diversification of structural stages provides better resiliency in the landscape and the species that are dependent upon those plant communities.
- c. The agency appears to confuse the elements of time and space in the approach to establishing desired conditions for the presence of old-growth on the landscape. Maintaining a large and increasing amount of the landscape (space) in mature and old-growth habitat because old-growth takes longer periods of time (time) to develop mixes the two important components. It can be understood as an ecological investment portfolio. Old-growth is a high-risk/high-value market. Continually placing more assets into this market for longer periods of time is a very risky investment strategy and contradicts proposed standard 1- long-term persistence of old-growth forest conditions within the plan area, as well as the purpose and need for the amendment- climate resilience. An example of the risk is demonstrated by the spruce beetle and mountain pine beetle epidemics which spread concurrently across the entire state of Colorado due to drought conditions beginning in 2003. Whole landscapes were predisposed to the disturbance event due to the majority of stands being in late mature or old-growth condition and the risk to Canada lynx was of great concern to managers. Far greater swings in habitat condition occurs under this scenario.

Remedies to this issue would require the proposed action elements listed above to be restated with deference to existing LMP Desired Conditions for old-growth presence, or otherwise establish upper limits for recruitment where such Desired Conditions are missing from a LMP.

2. Proposed Standard 3 affects lands designated as suitable for timber production and states that once identified as old-growth they can no longer be managed for economic reasons. The proposal fails to establish 36 CFR 219.11 as a substantive provision and meet its requirements, as required by NFMA.

Remedy for this issue would involve re-analysis of the suitable timber base on each national forest, as affected by this plan amendment.

Thank you for considering and addressing these comments.