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Comments: Comments on Old Growth Forest Amendment by Pat (she, her) (M.S. Natural Resource Management and Wildlife Biology)

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Please see my general and more specific comments on the amendment below:

General Comments:

It is commendable to develop an amendment to conserve old growth forests, to protect them from stressors like climate change and un-natural fires. The federal agencies need to be careful about their fire management practices. The goal of these practices should be not to suppress fire in these precious, and unique, old growth forests, but to encourage fire in a sustainable way, since fire has been a part of these ecosystems since they began. If the goal is fire suppression, then that could encourage more fires to spread. More roads and too much thinning can dry out sites and give more opportunity for fire. There needs to be a mixture of thinning, and fuels reduction, using prescribed fires before big fire events, as has been stressed in the preferred alternative.

It is important that you state the percent mortality of old growth trees when you are conducting fuels reductions and prescribed fire actions. The percent mortality of old growth trees should not be greater than 1% in the stands that are being treated for fire. Otherwise, without a mortality goal stated and followed, you can have certain districts with managers that do not enforce the cutting of old growth trees and even forest units, or sections. There are monies that fund the federal agencies, and these come from timber harvest. In the past, these monies have led the agency to clearcut massive amounts of old growth forests. I worked in the forests in the Pacific NW as a field biologist and crew leader. I watched, and heard the big, old trees falling. I witnessed the destruction of our heritage. The driving force of money to fund the agency and positions should not be the driving force behind the management of this amendment. Therefore, strict standards and protocols need to be published for the public to review each year or every few months, on whether the amendment is being used in the field, and how and where it is being used.

This is an incredibly historic and large amendment aiming to protect some of the last remaining old growth ecosystems on the planet. This amendment needs public review even after it becomes a Final Environmental Impact Statement or Amendment. Yes, NEPA spells out many of the rules, but the public needs to be able to review the actions on these projects in their local areas so we can see what they look like on the ground. Tours (on the ground and virtually) of each of these old growth restoration or thinning projects need to be available to the public on a regular basis, so we can see how well it is being implemented.

The amendment states that it is just a guideline and does not mean that there will be any on the ground actions. That needs to be explained in more detail and placed at the top of the amendment. I would like to know the likelihood that each district will follow any of the recommendations in the amendment. What are the consequences if they don't?

I worked as a wildlife biologist for the USFS and several federal, state and non-government agencies for over 20 years. I worked for the Forests and the research branch of the Forest Service. Many years of my life were spent studying and comparing old, to mature and young forests under research scientists. The published studies showed the unique ecosystem in mature and old growth forests that support species that cannot occur in younger forests, or plantations, or clearcuts. I also taught forest ecology classes as a college faculty for over 20

years, so I emphasize again, that this amendment needs to use the current fire science, and climate change science, not suppress fire, as it has been in the past, but to manage for natural fire to occur, at regular, researched fire intervals for each forest type. Also, there needs to be a method for the public to know about how the amendment is being implanted on the ground.

Please see my specific comments below:

Section 1.7 What is meant by addressing concerns about the redundancy of old growth forests? Define this more clearly. It sounds like you don't want there to be more old growth forests that repeat themselves in terms of structure.

Section 1.7 Strengthening the capacity of existing and future old-growth forests to adapt to the ongoing effects of climate change and future environments, is a very good idea, but what is the definition of capacity in terms of an ecosystem like old growth? Give an example.

Section 1.7 Incorporating Indigenous Knowledge is very good and hopefully they are good values for ecosystem function and resilience. I think it is important to discuss the direction and management with them, to include them in the decision-making process.

Section 1.9.1 Define social and economic sustainability. Who judges the amount of social and economic benefit of the old growth forests?

Section 1.10 The issue of timber production and conserving old growth: Be specific about what standards will be used to address this issue.

Section 2.3.2 "Some vegetation management needed to achieve management objectives (e.g. hazardous fuels reduction, resilience to insect and disease, species composition, etc.) could result in an area no longer meeting the definition of old-growth immediately following vegetation management being completed but could result in the area being more resilient and adaptable to stressors and likely future environments - allowing the area to continue succession back towards old-growth forest" This issue is too vague. Who decides and how do the managers decide, the level of cutting allowed in an old growth stand to improve its resilience? Where would the manager draw the line? What percent of the current old growth stand would be cut to achieve a goal?

2.4.1 "All action alternatives would amend every land management plan." This is the statement that concerns me. It needs to be clear how each management plan specific to a geographic area will deal with their old growth. For example, old growth at high elevations is very different than that at lower elevations, and coastal old growth and the redwoods are much different than the inland old growth, as you know. So, having a blanket EIS that applies the same old growth amendment to all of the various forests and federal land can be good, but needs to be specific per National Forest, District and BLM district. One size does not fit all. I want to see the available science on each of these districts, that describes how best to reduce climate change stressors and still manage the forests sustainably. I want to see examples of how a current old growth stand for example, would be managed in the future. For example, for the old growth forest on Willamette National Forest along the McKenzie River Trail between Paradise campground and Belknap Hotsprings: Will the structure of this forest change due to fuel reduction practices, so much that it will not have dead and down and multiple canopy layers that are part of old growth forest structure in west side forests under 4,000 feet? Also, how many years of recovery are estimated after fuel reductions under old growth canopies? I want to see diagrams and pictures of before and after management in a database that is accessible to the public. These forests have beautiful structure and complexity visually and as intact ecosystems. I think only long term studies can help with estimates for how long fuel reduction will impact an old growth forest visually.

Page 134 The statement is made that the amendment guides management but does not mean that there will necessarily be any "on the ground actions." So, what is the impetus for the agencies to follow the amendment if it

has not teeth?

I look forward to receiving updates on the implementation of this important amendment.

Thank you,
Pat