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Comments: Hello - thanks for the opportunity to comment on the Draft Amendment. I'm a resident of Oregon, and I spend a lot of time in the Oregon and Washington Cascades recreationally, as well as in my capacity as a volunteer for conversation groups in the area. I've participated in tree planting, low-tech process-based restoration projects, beaver reintroduction, and camera studies to track the reintroduction of fishers to the Washington Cascades, among other projects. I'm not trained specifically in this field, but I've spent a lot of time with people who are and consider myself to be a reasonably well-informed citizen. Additionally, while I'm an environmentalist at heart, I understand and appreciate the multiple goals the Forest Service has to balance which are often at odds with one another.

I support the stated goal/vision of the Draft Amendment to create a system of resilient old-growth forests in our nation's national forests. However, I'm concerned that the current plan as written will not achieve those goals, and falls short in a couple significant ways.

My first concern is that while the amendment acknowledges the importance of old-growth forests in sequestering carbon and fostering biodiversity, there's no language in the plan that would encourage the development of new old-growth forest. There are large areas which are "late-secessional" that are poised perfectly to become old-growth, and the plan should include a process for identifying them and setting them aside from future logging. Given the large amount of old-growth we've lost in my lifetime, it's not enough to simply protect what's left - we need to foster the development of new old-growth by selectively protecting the areas best positioned to reach that stage.

My other concern is that "proactive stewardship" of the forest is often not beneficial. I understand (and have participated in) projects in drier forests on the east side of the Cascades that involve duff clearing, thinning, and prescribed burns in order to restore a more traditional old-growth character. However, I've heard from knowledgeable local naturalists that thinning (and proactive management in general) on the wetter west slopes of the Cascades is often counter-productive and can at times be harmful, especially in old-growth. The biomass that we're removing should instead be left to develop structural complexity, build healthier soil, and ultimately become a rich diverse habitat. I'm concerned that the promotion of proactive management in all forests, as well as the exception allowing the disregarding of stewardship standards when "not relevant or beneficial" (without a clear explanation of those parameters) will allow loopholes to include areas of the forest in future timber sales when they'd be better left alone.

Thanks again for the opportunity to comment - I appreciate the magnitude of the task you're faced with, and hope that you'll consider revising the amendment to strengthen it, making it a more useful tool to promote and protect old-growth forests. In a case like this, we really only have one chance to get it right, and it's crucial that we do.

Michael Sulis