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Comments: I am so thankful to live in the Pacific Northwest where such vast areas of land is under public domain. The Forest Service's LMP Direction for Old Growth Forest is a huge step in the right direction. I urge the Forest Service to adopt a record of decision that is a strengthened version of Alternative 2 in the Draft Environmental Impact Statement. I would like to ensure that the following information is considered:

1) Fire suppression activities within Old Growth stands should not include the cutting of Old Growth trees. Trees with a large basal diameter are able to burn and survive to seed the next forest. Cutting these trees as part of fire suppression hurts these areas for decades to come, long after the fire passed through the ecosystem. The implementation of this LMP should also change the way that crews work an active fire. Education surrounding fire in Old Growth stands vs monoculture stands should be implemented to crews prior to deployment. Fire suppression activities using mechanized equipment (bulldozers, tracked equipment, helicopters) should be restricted from Old Growth stands.

2) The removal and sale of trees that were germinated before colonization (approximately 180 years ago), should be prohibited. The nutrients found in the wood of these trees should be left for future generations of the forest. Taking these nutrients away further depletes the quality of our soils, destabilizes the soils that could be retained by the downed wood, and restricts biodiversity of life growing in the soil. Danger trees and other trees that are felled should be left in place, or in a place as close to germination as safe.

3) In all future timber sales, the removal of trees with the top 10-20% DBH (diameter at breast height) values should be retained. In many watersheds that are stewarded by the USFS, there is no longer the large trees that survived fire and drought. The monoculture plantations that are left should be managed to produce forest that have Old Growth characteristics. Timber sales should not be designed to haul the largest trees out of the forest, but instead haul the fuels out of the forest to reduce ladder fuels. The area directly underneath individual Old Growth trees should be managed to reduce ladder fuels from reaching the crowns of large, tall, fire resistant trees. In addition, the species of tree should be considered as many species (such as Pacific Yew) will not likely be in the top 10% DBH of a particular stand.

4) Fire recovery projects should be evaluated using this LMP just as timber sales are. The sale of Old Growth trees should not be permitted, whether the tree has been burned or not. Large dead snags are beneficial to wildlife and when they fall, continue to benefit the ecosystem. Fire recovery projects should never include Old Growth in the estimate of merchantable timber. The science surrounding the regeneration of fire burned trees shows that Old Growth trees are able to recover, even after having complete crown mortality. The removal of these trees reduces the genetic information of trees that are able to survive fire and eliminates the possibilities of that tree seeding the next generation of forest.

5) Mechanized equipment in Old Growth stands should be reduced to the least possible amount during any timber sale or other projects. Temporary road building within Old Growth stands should be prohibited as the compaction of these soils greatly increases the impacts of the timber activities. Tracked equipment should be restricted from travel off of the road prism. Extraction of trees should be planned to compact surrounding soil to the minimum extent possible.