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Comments: Please consider these alternatives: For the dry forest, matrix, trees older than 100 years should be retained, rather than 150+ years. 150+ year old trees would often be quite few and we need to retain more of an older fire resistant cohort. For the dry forest LSR, likewise there should be retention of 100+ year old trees and also only thinning, no regeneration cuts, or else young stands in these LSR areas will never become an old growth forest. Also consider in the dry forest, in both matrix and LSR, a thinning only alternative, as regeneration cuts and subsequent plantations would increase fire hazard. This thinning could be to rather low stocking so as to allow some natural regeneration in the understory.

For the moist forest, matrix, consider an alternative to bar regeneration cutting in National Forests that have less than historic amounts of old growth, or particularly where large fires have created larger than historic amounts of early successional or young forest. Moist forest LSR definitely should not have regeneration cutting; there has been more than enough catastrophic fire and regeneration cutting sets back the progress towards late successional forest.

The mitigation for Survey and Manage and Special Status fungi has been exceedingly poor and scanty. Please reanalyze effects to all rare fungi as well as rare old growth associated fungi as the previous analyses have been inadequate. There does not seem to be any evidence that rare fungi will survive timber management and wildfire given the minimal effort spent in understanding these species. Consider an alternative that increases the effort expended on rare fungi, including ongoing determination and reanalysis of which species are truly rare.