

OLD GROWTH, DESIRED CONDITIONS

OBJECTION ISSUE SUMMARY

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We agree that, “Old growth remnants appear to be both biologically and socially significant on the Francis Marion” (p. 204), and that, “The availability of old growth conditions on private lands is likely to decline in the future...” (p. 209). We don’t agree that desired future conditions will protect these legacy remnants on national forest lands. The FEIS also incorrectly misquotes standard S37 as requiring that current old growth stands be “maintained.”

REMEDY(S) PROPOSED BY OBJECTOR

As a result, this conclusion from the effects analysis is flawed and should be remedied: “Through S37, stands meeting age criteria for old growth would be maintained using the age criteria in the Region 8 Old Growth Guidance.”

In addition, with only 30,000 acres of potential old growth (of which 20,000 is currently protected), none of these should be excluded from the old growth network envisioned by the desired condition, and designation in the revised plan based on the best scientific information. We don’t understand that the phrase “future old growth-compatible allocations” could include those where harvest of old trees is required. That would be the case on any lands suitable for timber production.

FOREST SERVICE RESPONSE

In this issue, the Objector makes the statement that the desired conditions will not protect the “legacy remnants” (current old growth) on the national forest. This issue of protecting existing old growth is addressed in the Issue – Ten Percent Old Growth Objective and Standard to Protect Old Growth, so that discussion won’t be repeated here.

The Objector also states that the FEIS incorrectly misquotes standard 37 as requiring that current old growth stands be “maintained”. A review of the FEIS shows that it does misquote

standard 37 on pages 208 and 209 that stands meeting the criteria for old growth will be “maintained”, while the Revised Forest Plan has standard 37 as “identifying” old growth stands and then “considering” their contribution to providing for a network of old growth areas across the landscape.

In the remedy, the Objector questioned how “future old growth compatible allocations” could include allocations where the harvesting of old trees would occur. The acres identified in the FEIS as “future old growth” are made up of those lands identified as unsuitable for timber production (which includes wilderness areas, riparian management zones, and various other special and designated areas, all of which totals 65,602 acres); rare communities and pine stands within RCW 0.5-mile foraging partitions within Management Area 1.

The pine stands within the RCW 0.5-mile foraging partitions in MA 1 are counted as “future old growth”, even though they are in lands classified as “suited for timber production”. This is because once these stands have been converted to longleaf pine and have reached the age for being considered as old growth (120 years old), uneven-aged harvesting techniques will be used to maintain the desired conditions for these stands, which includes creating and maintaining desired open canopy conditions. (See FEIS, Appendix B, pp. 11-14). These rotation ages are consistent with the red cockaded woodpecker (RCW) Recovery Plan, 2nd Revision, which contains the following guidelines for management habitat for red-cockaded woodpecker on public lands, p.198. “If two-aged management is used, then use rotation intervals not less than 120 years for longleaf pines and 100 years for loblolly, slash, and pond pines”.