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Title:

Comments: Dear USFS Chief Randy Moore,

Thank you for conserving a greater amount of Old Growth forest, as per the Executive Order, for the good of the American people. The USFS is at a very significant crux and it is imperative to save all existing Old Growth forests and those with Old Growth attributes, and to save a much greater percentage than has previously been the case. After 40 years of research and experience with virtually every Federal or state agency, I find an impelling need to comment on the future of Old Growth forests in the Nantahala-Pisgah (N/P) in general and the Big Ivy-Craggy area in specific.

All Old Growth forests, natural heritage areas, roadless areas, and sensitive habitats should be not just temporarily but permanently protected and should never be placed in zones that are open to commercial logging.

Old growth forests are incredibly rare. We have at best ~1% remaining in the eastern US. So much has slipped through our fingers already, but we should be wiser from research now. There is already a vast amount of early-succession, fragmented habitat around WNC and much of the US.

One of the Forest Service's prominent core goals is upholding biodiversity.

Since Old Growth is rare, we should be protecting every bit that we have on the N/P and other forests. And since Big Ivy is one of the top 3 places on the N/P for Old Growth, good quality forests buffering the Old Growth, and biodiversity, why would we NOT protect it in its entirety?

In my research, I learned that these ancient Old Growth forests are IRREPLACEABLE! Once they're gone, they're gone. Yes, trees and plants grow back, though not necessarily the ones we want. But the complex structure, diversity, and qualities are never the same, from the big trees down to the mycorrhizae underground. And it is pretty well guaranteed that when areas are opened up even just for logging roads, that invasive non-native species will get a foothold and will degrade the forest and make survival of native species more difficult. Plus many animal species, including some rare ones, need the large blocks of forest interior conditions that will be lost. Many medicinal cures have been found in forests and there are likely more to come. And for oak trees, prime acorn production (which is essential for wildlife through the winter) doesn't usually even start until the trees are about 70 years old and they might live to be 400-500 years old.

And retaining mature forests is much better for immediately ameliorating climate change than planting new trees. And this also increases stability and sustainability. Plus, logging the national forests here does not provide any permanent jobs. In fact, tourism is very important here and the intact forests are what bring more people here. There are many reasons why in protecting the Old Growth, the USFS can benefit and protect the public.

It is critical to protect all Old Growth forests (many areas have been mapped in the past by researchers). The next most important forests to protect are those with Old Growth characteristics and those with Old Growth remnants and characteristics interspersed within them. And we don't need the green-washing saying that we're protecting a lot of Old Growth, then making temporary Old Growth designations. It can't just be moved around. And designations should not be placed in young forest or early successional stands and calling it future Old Growth. This is very misleading.

I hear talk of stand ages and that is a management term, not what happens in nature. I can understand some management for hunters (though I find more grouse in older forests with rhododendron than in early succession areas) or for some rare species associated with early succession in certain places. However, we shouldn't be managing toward the vast amount of early succession that was present at the turn of the century when most of the land had been logged.

It is of utmost importance to recognize that forests are naturally and evolutionarily a continuum, and not of a certain 'age'. There have been always been small patches of disturbance from storms, fire, etc. through time that create small patches (gap dynamics) of early succession communities, but it would be extremely rare to have whole forest areas of a one age replacement stand until modern forestry and fire suppression. Forests are, and should be, continuous and of mixed age trees.

So, as far as Old Growth is concerned, the more we can increase the acreage, the better. Prescribed burning should be allowed in areas where this is appropriate. Some carefully laid out trails might be possible, but new roads, thinning, or skid roads would not be.

Also, we are very proud that our Representative Edwards created a bill proposing the Craggy National Scenic Area. However, if I am correct, before introducing it, he first sent it to your office a while ago and it has been resting there. He was waiting to bring it to the floor after your office examines it I realize that the next step now rests with you. Please tell me that there is forward progress for this idea whose time has come and it can now be introduced.

Thank you very much for your time,

Karin Heiman

ATTACHMENT: OG comment 1-21-24.docx is letter content.