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Organization:

Title:

Comments: I was very encouraged by the new amendment regarding the protection of old growth (OG) areas in our national forests. I live close to Pisgah National Forest, and spend my best time in the OG areas there. I believe that the scientific reasons for protecting OG is more than sufficient for a complete moratorium on disturbing OG. Living here, it is the aesthetic-recreational reasons that have motivated me most to be involved in protecting OG. I commented on the initial Pisgah and Nantahala National Forest plans when they were first published, and participated by zoom in some national meetings on protecting OG and mature forests. In addition, last year I submitted a resolution to Protect OG in the Pisgah and Nantahala as part of the North Carolina Democratic Party's platform, which received great support from other party members in our area.

I am writing to add a research design reason for leaving OG undisturbed. I am a retired Professor of Biostatistics, with expertise in trial design and analysis. In my experience, the validity of trials is greatly improved by including positive controls. In the Pisgah and Nantahala, estimates are that there is just 10% OG remaining. I have attempted to become familiar with all the accessible OG areas of the Pisgah. What is striking to me is the uniqueness of each area. For any management trials of new forest interventions in the non-OG forests, it is critical to include OG areas as positive controls. Positive controls need to be matched closely in important characteristics to the trial areas to make comparisons meaningful. Given the 10% estimate and that individual OG areas are unique, it seems critical to avoid disturbing any of the OG areas here, because each might be the best control for a specific management trial.

I am happy to explain this in more detail or to volunteer as a consultant on trial design and use of positive controls.

ATTACHMENT: Forest service trial controls.docx is letter content.