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Title:

Comments: USFS National Old Growth Forest Plan Amendment

(Land Management Plan Direction for Old Growth Forests)

Comments submitted by Jonathan Gibson

Thank you for the opportunity to comment. Who am I? Age 79, grew up in the South, 41 years in Vermont; family owns bottomland hardwoods, conserved, in the South and 140 acres of managed northern hardwoods in VT. Graduate degree in natural resource policy and administration; know, recreate on, and value eastern forests and public lands along the Appalachians (and in West as well).

Why am I commenting? Because I appreciate the conscientious and dedicated work that USFS staff do to manage our forests for a variety of uses; and because I want to offer a few comments that are focused, relevant, and that I hope will assist you in making the wisest decisions in the matter at hand.

Some recent experiences have painfully reaffirmed my belief since youth that we humans need areas on public land that provide what private lands do not - large blocks of undisturbed and unfragmented forest "where the earth and its community of life are untrammelled by man" (1964 Wilderness Act). In addition to their value to the spirit, we are now keenly aware that old forests and mature forests that are progressing towards old provide an indispensable ecological service in mitigating climate warming.

Recent logging of a mature, potentially old growth stand on a moist rich northern hardwood site on State land and loss of the possibility of a conserved wildlife corridor due to a private land purchase have underscored for me the urgency of achieving proper and long-term protection of the ecological values of the older forests that on our public lands.

I believe Executive Order 14072 should be viewed not only as a call to inventory "mature and old-growth forests" but as a mandate to address ways to preserve both categories of forests - old and mature. To protect old forests of the future, we obviously need to safeguard the "mature" forests of today, but I do not see the components for management of mature forests adequately addressed by Direction in the Amendment. Nor for existing old forests do I see full protection. In the Technical Guidance for Standardized Silvicultural Prescriptions for Managing of Old-Growth Forests, for example, a detailed assessment process is prescribed, complete with flow chart, for significant human manipulation of clearly identified old-growth forests. I find this inappropriate and unacceptable.

Yes, there are threats - invasive plants and insects and especially fire - we've had serious losses to redwoods and sequoias - but the Plan really needs to restrict entry and extraction from all old-forests (and especially those

in the East where the relict old growth stands are a tiny fraction of what once existed). Let's be a little more humble; again, what was a legal directive in 1964 is still good guidance in a broader sense today - every old forest should be "an area of undeveloped Federal land retaining its primeval character and influence [hellip]..which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature[hellip]".

We're hearing a lot now about new silvicultural approaches that will accelerate attainment of "old growth characteristics" (D'Amato and Catanzaro's work in Massachusetts and Vermont, for example), and the draft Amendment suggests these techniques may be applicable to old and mature forests. The practices offer some promising possibilities, but No, not in existing old growth, and for mature forests, only for demonstration and research purposes. I see these terms like "ecological enhancements", "transitional strategies", "patch cuts to mimic forest disturbance" being used to repackage conventional economic timbering with new wrapping. I ask you not to venture down that road.

The USFS should designate significantly more of the mature forests in our National Forests for special management as future old growth - with significant representation in all Regions and of all forest types. The Plan Amendment should also direct the Regional Offices to identify and move toward designation and management of sizable acreages of mature forest as Climate Forest Reserves or Ecological Reserves in which carefully-designed old-growth enhancement or transition work can be undertaken and monitored over time and ecological research conducted - I suggest especially on the soil biome and on carbon sequestration, storage, and cycling. This is a once-in-a-generation moment, a time for a transformational shift in what we value our forests for and therefore in how we manage them. Swing for the fences, friends, for the American people you serve today and for the generations to come. Best regards.

Sept. 20, 2024

ATTACHMENT: Comment - USFS Old Growth.docx - this is the same content that is coded in text box; it was also included as an attachment