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First name: Jake

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Organization:

Title:

Comments: To Whom It May Concern,

My name is Jake Hochberger. I am responding to the Notice of Intent to prepare an impact statement for land management focused on old growth and mature forest conditions across the USDA National Forest System. Thank you for this opportunity to comment and take part in developing the best path forward for U.S. forests, and the wellbeing of our planet.

I am a river guide, an outdoor educator, and an avid user of national forest land and waterways. I work closely with a broad array of people who benefit greatly from access to wild and natural ecosystems and clean rivers and creeks. There is no question in my mind about the value of healthy forests for the health of the people- those who use them, live adjacent, or simply fall sleep knowing they exist. I speak on their behalf. My students and clientele come to the forests and waterways of the Southern Appalachian Mountains not for my company, but for my support in immersing in natural places, connecting to healthy ecosystems, accessing and navigating to remote pristine rivers and creeks. My prosperity, that of the outfitters with whom I work, and the surrounding community economies all depend on these places being maintained to the highest standard. I share this all to say, old growth and mature forests and their ecosystems are important to me and my community.

Therefore, I am sincerely in support of this latest move to protect and restore old growth and mature forests across the United States. This is a groundbreaking initiative that I'm overjoyed to see moving into action. Thank you for your part and efforts in this milestone move.

With that in mind, I think there are some essential factors to re-consider, adjust, and include in completing this forest management plan:

#### Protect Mature Forests:

To focus on existing old growth is not enough. In time, these trees will fall and become nutrition and habitat for the forest floor. This is good! And mature trees are essential in filling their place in time. They are the succession, and must be protected at all costs. The forest management plan must safeguard mature forests from logging for any reason including fire, wind, and insect outbreak.

#### Unequivocal Protection of Mature & Old Growth Regardless of "Natural Processes":

It has been shown that old growth and mature forest stands provide refuge and increased biodiversity in the face of forest disturbance by fire, wind, and insect outbreaks. It is imperative that there be no exceptions to the protection of mature and old growth forest ecosystems. Allow dead, burnt, fallen trees to work back into the forest floor, providing nutrition and habitat. Allow all stands to remain in the path of "natural processes".

#### Close the "Forest Health" Loophole:

Fire management must not be an acceptable excuse to cut or disturb old growth and mature forest ecosystems.

Felled and burned trees continue to provide habitat and nutrition for the biodiversity inherent in these stands. As stated above, old growth and mature ecosystems provide refuge and resilience in the face of fire and other natural disturbances.

**Prioritize Watershed & Aquatic Health:**

Intact and healthy old growth and mature forest ecosystems do more to filter groundwater, shade and protect waterways, and provide habitat for greater biodiversity than any other forest type. The health of our forests can be judged by the health of our waterways. The management plan should always promote the highest protection to the waterways around, within, and near old growth and mature ecosystems.

**Prioritize Road & Trail Projects That Promote Resiliency & Watershed Health:**

Rather than focusing on road and trail projects in regards to maintenance backlog needs, please prioritize road and trail projects that will restore, protect, and benefit the long term wellbeing of mature and old growth forest ecosystems, water quality, and fish passage.

**Accountability for Failures to Uphold Old Growth & Mature Ecosystem Protections:**

Please develop and maintain a method to effectively hold regional forest management officers accountable for failure to manage old growth and mature forest ecosystems to the highest standards outlined in the final management plan. For example, the Southside Project in the Nantahala National Forest in North Carolina is slated to move forward to cut old growth timber in an ecologically sensitive "special interest area" alongside the Whitewater River. This must not come to pass. Please prove your commitment to the initiative to protect old growth & mature forest ecosystems (and thus adjacent waterways) by ensuring the immediate cessation of this project, and by developing a method to hold regional forest management officers accountable for disregarding old growth and mature ecosystem protections. If there is no accountability, then this may all be for naught.

Thank you for the opportunity to advocate for improved management of our national forestlands and waterways. And thank you for considering the ideas and propositions stated above.

Sincerely,  
Jake Hochberger