Data Submitted (UTC 11): 2/3/2024 3:08:00 AM First name: Chance Last name: Raso Organization:

Title:

Comments: I am submitting this comment in support of Executive Order 14072 signed on April 22nd, 2022 to add protections to old-growth forests on federal lands. I fully support the motion that national forests have taken to amend all 128 forest management plans across the country in order to comply with the executive order. As someone who is a published researcher in forest ecology and have made successful efforts to protect and document old-growth forests in my professional career, there are some factors I believe the US Forest Service should consider when making plans to preserve old-growth.

Having each National Forest modify their management plan individually is a great idea since old-growth forests can have differing structural and age characteristics depending on the forest type and I am glad to see the US Forest Service make this motion. I would like to see the USFS consult experts to define what classifies as old-growth in major forest and habitat types across each national forest. For example, in my part of the country in Appalachia, old-growth forests can be rich coves with towering 300 year-old tulip poplars that illicit one's ideas of old-growth, or they can be dry rock outcrops with stunted 300-400 year-old chestnut oaks barely 20 feet tall. Both examples are worth protecting and provide significant ecological and societal values, even if one doesn't conjure up the image of old-growth in the public conscious just because the trees aren't large. Having these varying forest types defined can ensure no old-growth is cleared or degraded, even if the forest isn't the stereotypical image of the old-growth in the rainforests in the Pacific Northwest or the coastal redwoods that most Americans probably think of when they hear old-growth.

Building off of the first point, I think it's important that the USFS makes effort to document, inventory, and map out the existing old-growth forests across each National Forest. Having this info will be crucial during management decision processes and ensures no old-growth is ever commercially harvested. With this particular goal, more old-growth can be discovered than what was previously thought to have existed. The USFS can consult with academics and old-growth advocates who could share information and data. I can envision an interactive public web map showing where all known old-growth forests are on our federal lands. Researchers can then more easily establish long-term monitoring plots to track all of the services old-growth forests provide, such as carbon storage and biodiversity to compare with managed forests.

Lastly, I think this executive order gives the USFS a unique opportunity to adapt to changes regarding the ever increasing recreational visitor use on public lands across the country. Many of the popular recreational use areas, wilderness areas, etc. are being loved to death across our country, causing resource damage from over use and lowering visitor experience due to overcrowding. More and more people across America are getting outside, appreciating nature, support preserving as well as visiting old-growth forests. Having old-growth forests protected from commercial extraction gives the USFS the opportunity to create more wilderness areas, day-use recreational areas, as well as nature trails for people to explore old-growth forests. Research has shown people find old-growth forests more aesthetic, preferring to recreate in these forests compared to younger forests or actively managed timberland. Creating recreational spaces in old-growth forests can provide benefit to the USFS in two ways, first by providing new recreational opportunities to an ever increasing American public interested in the outdoors and thus spreading out visitation and taking some of the strain off of already established and popular recreational areas, and secondly by giving the USFS land that can generate revenue and add money to the local economies through tourism so that the protected old-growth forests don't feel like they are being "locked up" as land that cannot have any use.

In my state of West Virginia, multiple old-growth forests have recently been rediscovered, documented, and preserved on both public and private land over the past couple of years after the state attempted and failed to log old-growth forests in numerous state parks. The public was totally against this logging attempt despite being a

state where extraction industry jobs are the backbone of the economy and environmental issues amongst citizenry aren't always welcomed with open arms. As more and more old-growth forests are being put on the map and in the public's eye across the state, people are seeing these forests as something to take pride in. These forests are becoming hotspots for ecotourism and for people to travel great distances to visit and explore.

With only a fraction of the original old-growth forest remaining in the United States, it is more important than ever that the country takes effort to protect what is left with all of the numerous threats facing these places ranging from climate change, invasive species, and development. These forests represent our country's history, highlighting how values and ethics towards the land are always changing. The conservation and preservation movements started due in part because what was once thought to be endless resources became scarce. It was only after many forests were poorly managed and wild places and natural landscapes became rarer in the early 20th century did society start to value them. While the USFS comes from the conservation ethic, I think preserving old-growth falls into the idea of the "greatest good to the greatest number for the longest time." There are less natural places in this country everyday and with more people wanting to explore the natural world, it is imperative that public lands and the USFS protect what old-growth forest are left, not only for people today but into the future. This is something America can take pride in.

Thank you for taking the time to read this comment.