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First name: Elaine

Last name: Lite

Organization: Mountain Voices Alliance

Title: Director

Comments: Old-growth forests store large amounts of carbon, clean the air, provide critical wildlife habitat, maintain and increase biodiversity, filter water, and reduce wildfire risks. The old-growth forests of the Nantahala-Pisgah National Forests are home to several endangered and threatened species, including four species of endangered bats and the imperiled Blue Ridge lineage of green salamanders. Unfortunately, across the nation, old-growth forests are in decline, facing stressors from pests, extreme weather, and commercial logging.

The proposed National Old-Growth Amendment (NOGA) offers the beginning of an opportunity to better protect and restore old-growth forests, but only if it's finalized and implemented properly. Currently there are serious areas of concern.

* As written, NOGA fails to allow passive management as a method of preserving or enhancing old-growth characteristics. We feel strongly that should be amended to include passive management as an option for managing old-growth forests.

* Proactive stewardship of old-growth forests has the potential to degrade the old-growth ecosystem. The amendment should include a non-degradation clause for cases where proactive stewardship methods are employed.

* Exceptions allowed under NOGA are unclear. The Forest Service should remove the exception that allows for development at an "ecologically appropriate scale" and employ clear, already defined language to improve NOGA's clarity.

* While old-growth forests decline, threats to old-growth increase. As written, NOGA does not offer a clear path by which the Forest Service can identify suitable mature forests and manage them to become old-growth, which is critical if serious decline is to be averted. NOGA should be amended to include a clear plan for recruitment of mature forests into old-growth conditions.

* There is no one-size-fits-all approach to forest management, and as written, NOGA characterizes threats to old-growth forests uniformly across the country. NOGA should better characterize threats and more specifically prescribe management actions based on forest type and location.