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First name: Laura

Last name: Boggess

Organization:

Title:

Comments: As a naturalist, outdoor recreationist, and ecology professor at Mars Hill University, I am concerned about the National Old-Growth Forest Act (NOGA) as currently proposed. Many of the points I raise here have been discussed by the knowledgeable team at MountainTrue (a western NC non-profit organization), but I have independently arrived at many of these conclusions through my own research and experience.

First, NOGA, as currently written, mandates only active management strategies for old-growth forests. However, in my professional experience, passive management is often a more effective method for preserving or enhancing the characteristics of old-growth ecosystems, particularly in areas that are not prone to fire. The Forest Service itself acknowledges that a "hands-off" approach can sometimes better serve these unique ecosystems. Therefore, I strongly advocate for NOGA to be amended to include passive management as a viable option.

Another critical concern is the potential for proactive stewardship to inadvertently degrade old-growth ecosystems. The current draft of NOGA is ambiguous, which could lead to interpretations that allow degradation if it serves other project goals. This is unacceptable. NOGA must include a non-degradation clause to protect old-growth forests whenever proactive stewardship methods are employed.

Furthermore, the exceptions allowed under NOGA are troublingly vague. This lack of clarity could result in situations where development is permitted within old-growth forests, provided there is sufficient old-growth outside the developed area to compensate for the loss. This approach is flawed. The Forest Service should eliminate the exception that permits development at an "ecologically appropriate scale" and instead use clear, well-defined language to ensure the protection of these critical ecosystems.

As old-growth forests continue to decline, the threats they face only increase. It is not enough to simply preserve existing old-growth; we must also focus on recruiting mature forests into an old-growth stage to safeguard these ecosystems for the future. Unfortunately, NOGA, as written, does not offer a clear path for the Forest Service to identify suitable mature forests and manage them toward becoming old-growth. This gap must be addressed with a clear plan for the recruitment of mature forests into old-growth conditions.

Finally, NOGA's current approach to forest management is overly simplistic, applying a one-size-fits-all strategy across the country. This fails to account for the significant differences in threats and management needs between western and eastern forests. While fire poses a substantial risk to western old-growth forests, eastern forests are more vulnerable to improper management and commercial logging. The management strategies that benefit fire-prone western forests are not suitable for the moist, temperate forests of the East. NOGA should be revised to better characterize these threats and prescribe management actions that are tailored to the specific forest types and locations.

In conclusion, while NOGA is a step in the right direction, it requires significant revisions to truly protect our old-growth forests. As a concerned citizen and a professional ecologist, I urge the Forest Service and policymakers to consider these necessary changes. Thank you for your time and attention to this important legislation.