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Comments: I am writing to urge significant revisions to strengthen the USFS proposed National Old Growth Amendment. I am a surgeon and a certified NC Blue Ridge Naturalist, so I look at this from the perspectives of both public health and optimal management of the few unique and vital old growth (OG) patches existing today. Acknowledging that there is some variation in both the definition and accurate cataloging of existing OG, it is still well-known and well documented that true old growth is a uniquely powerful tool for storing carbon, and generating very high quality water and atmospheric conditions. Yet OG only comprises 5-10% of the remaining forest cover in the US. The implications for climate and public health indicate that we have to get serious about protecting, and thus leveraging, one of our most powerful tools. I believe Pinchot's directive for the USFS "to provide the greatest amount of good for the greatest amount of people in the long run" speaks directly to preservation of OG.

Suggestions for NOGA Management Plan improvements:

1) Eliminate the proposed 'ecologically appropriate scale' exception allowing development in or near any OG. This clause is prone to interpretive abuse. There's plenty of other acreage available for development, and no exception for general commercial or private enterprise should be allowed in any of the very few remaining OG stands.

2) Codify and encourage the application of PASSIVE management as a major tool in the care of these forest. The current plan really emphasizes active management approaches, which may be especially inappropriate when we are talking about OG ecosystems that are often several hundred years old. As a surgeon, I have seen the science and practice of medicine continually changing as new insights emerge and as past errors become evident with time. Forest management is no different, and we should not assume that our current active techniques always represent what will prove to be the best management practices - especially in such rare situations as healthy old-growth forests where the time-scales and complex interactions that are involved defy our existing knowledge level.

3) Add nuance in the Plan related to Western vs eastern Forests, acknowledging their differences and outlining unique management guidance appropriately tailored to each region. We all know that the hyper-intense fires existing out west are NOT the main problem for OG in the east, particularly along the Appalachians where rainfall is so common. The challenges that OG forest management needs to address in eastern forests revolve around things like massive development pressures, logging impacts, and damage from intense rain events.

4) Add a more forward looking element into the Plan by (a) acknowledging the importance of carefully recruiting new OG areas over time, and (b) including pathways for actively identifying and preserving strategically important mature stands that are evolving toward old-growth conditions. This might also prioritize areas of forest that are near National Parks, State Parks, or identified Natural Heritage Areas. The key here is that the Plan should include a strategic effort to expand our existing old growth inventory.

I appreciate your consideration and look forward to positive revisions in this Plan and Amendment.

All the Best,