

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

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Comments: I am a vegetation ecologist focused on understanding natural communities and how they function, including relationships between plants and their physical environments, and the ecological processes that affect them. I have had the opportunity to observe old-growth forests throughout New England, in spite of the fact that they are exceedingly rare.

Landscape ecologists in this region understand that old growth was the predominant condition prior to European settlement, and that Indigenous people were part of this old-growth forest. Much of New England was cleared for agriculture in the 1700s and 1800s, and in the last century has largely returned to forest, which now is mostly quite young.

The small patches of remaining mature and old-growth forest provide immense benefits, including carbon storage, protection of biological diversity, wildlife habitat, clean air, clean water, hydrologic regulation, recreation, spiritual renewal, and many others.

Because they were once dominant, because they are now exceedingly rare, and because of their known benefits to wildlife, biodiversity, climate resilience, and human health, most ecologists and conservation professionals, and, increasingly, many policy makers agree that more old-growth forest is needed on our landscape. Further, most forest ecologists agree that the best way to achieve this goal is to be patient, to let the forests heal themselves over time and develop old-growth characteristics through natural ecological processes, rather than through human intervention.

On the other hand, some forest managers prefer to hasten the process through active management. This can be helpful when legacies of past management need attention: things like rutted logging roads that hasten water movement and increase flashy floods, planting of non-native tree species, or unintentional introduction of non-native plants. In other cases, managers like to use active management to combine goals, achieving some old-growth characteristics while also creating specific kinds of wildlife habitat, or gaining financial benefit, as examples.

My professional belief is that passive management is almost always the best way to achieve future old growth. Occasionally a short-term intervention to address poor past management can be useful, but these interventions should be one-time events, followed by passive management into the future.

In the Draft EIS, proactive stewardship, which understand to mean active management, is heavily emphasized, and is, as I understand it, an important component of the preferred Alternative 2. I also understand that

commercial harvesting would be a part of the Alternative. I find proactive stewardship unnecessary, and I do not see the value in commercial harvest as part of the plan.

Alternative 3 is slightly better in that commercial harvesting is excluded. But active management is still allowed, and again, I find this unnecessary and undesirable.

Based on the importance of old-growth forests in the region and all the services they provide, and based on an approach that recognizes, with humility, that we do not understand how old growth forests will develop on their own in the future, it is my opinion that the best alternative is to emphasize passive management in most cases, to allow mature forests to develop into old-growth forests and to allow old-growth forests to manage themselves. Small and very limited exceptions might include short-term treatment of legacy impacts. In no case should forest products be removed from mature and old-growth forests, either commercially or non-commercially. All biomass should remain in place.

Thank you for your consideration.