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Comments: We urge the USFS to significantly strengthen the final record of decision to ensure meaningful protections for the nation's remaining old growth, and to lay the foundation to increase the abundance and distribution of old growth for future generations.

Currently, the proposed policies allow forest managers to do the bare minimum to preserve old-growth forests and creates loopholes that could lead to the continued or even increased logging of old-growth trees. Here in Oregon, we regularly see mature and old-growth trees targeted for commercial logging. Logging old-growth trees to save stands from potential threats is a false solution - they are worth more standing.

To successfully achieve protection for old-growth forests, the final NOGA must:

- Eliminate exceptions and end all logging of old-growth trees in National Forests.

Prohibit sending old-growth trees to the timber mills. The economic incentive for logging old-growth must be removed. If the logged tree cannot be sold or exchanged, it will likely prevent all but truly rare removals of old-growth trees.

- Set the stage for durable protections for mature trees and stands. This is paramount to the future of old-growth. Mature forests and trees - future old growth - must be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement.

Be consistent with the need to address wildfire. Protecting older trees and forests can increase forest resilience to wildfires, and combat climate-change related impacts such as flooding and drought.

- Given the outstanding role mature and old-growth trees and forests in national forests play in fighting the climate and biodiversity crises, it is vital that America establish meaningful safeguards for their conservation. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores more than half a million public comments the agency received on last summer's advance notice of proposed rulemaking.