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Comments: I greatly appreciate the Biden Administration's commitment to conserving 30% of land in the US by 2030 through Executive Order 14072. It is critical that this include protection of mature and old growth forests. The Draft EIS for National Old Growth Amendment (NOGA) is a good start, but it's focus on the western forests leaves it insufficient for the eastern forests in Regions 8 and 9. I am particularly concerned about the importance of mature eastern forests in carbon sequestration and storage and the need for all revised forest plans to highlight this as a priority.

The NOGA should be improved in the following ways:

- Revise the definition of "old growth forests" to include the unique diversity of life that thrives only in these ecosystems and to include their role in carbon sequestration and storage
- Do not allow the logging and sale of mature and old-growth areas in national forests and stop the commercial exchange of old-growth trees.
- Revise the current amendment to adequately acknowledge the precipitation and flooding increases in the eastern US. LMPs need to include adaptations to both the droughts and the increased precipitation and temperatures for the eastern forests.
- Expand protections of mature trees and forests in regions 9 and 8. Only 1.1% of forests in the Upper Midwest are old growth. To expand the amount of old growth forests, clear guidance must be developed for the revision of LMPs to identify and protect mature trees and forests to enable them to become old growth.
- Provide for landscape scale protection and corridor development of forest areas containing old-growth and mature forest.

In addition, it is important that when soliciting public comments you reach out to the eastern regions as well as the west. The two regions with the least amount of old growth forests were insufficiently covered in the DEIS and in your public comment efforts. USFS staff needs to meet with concerned parties in the eastern regions prior to the final EIS.

Sincerely,

Kelly Kearns

Recently retired Conservation Biologist

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