Data Submitted (UTC 11): 9/18/2024 4:00:00 AM First name: Barry Last name: Pendergrass Organization:

## Title:

Comments: The Forest Service should revise its mandate to extract value from public lands and prioritize nonmonetary benefits. In many cases these benefits outweigh the cash income that can be extracted. This is the case with old growth trees. They are so few now that the remaining stands should be protected. The value of old growth is in addition to the ecological, water quality protection and carbon sequestration values they provide. There is no replacement for the non-monetary services offered by old growth forest. It should be clear by now that treating forests, or any part of the environment, solely as commodities to exploit doesn't preserve many services we need. Subsidizing commodity extraction isn't working economically either. Please reform agency culture within the Forest Service to prioritize environmental services and ban commercial cutting of old growth on public lands.

I urge the U.S. Forest Service to significantly strengthen its final record of decision on the national old-growth amendment to (1) ensure meaningful protections for the United States' remaining old-growth forests and (2) lay a foundation that will increase the abundance and distribution of old-growth trees for future generations.

The agency's proposed policy includes numerous loopholes that allow for continued - or even increased - logging of old-growth trees. Logging old-growth trees to save them from potential threats is a false solution. These climate champions are worth more standing. The full range of potential benefits of old growth, including genetic resources, are not well understood. I'm asking you to act now to preserve the non-monetary benefits of old growth.