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Organization:

Title:

Comments: RE: NOGA must be improved to protect and expand mature and old-growth forests in the Eastern US

Dear Chief Moore:

Thank you for the opportunity to weigh in on updated forestry management, especially given the urgency of the current climate crisis, species extinctions, and biodiversity loss.

I am a volunteer with the Sierra Club - Wisconsin Chapter which represents over 14,000 members in the State of Wisconsin. We are located in US Forest Service Region 9. I join the Wisconsin Chapter in appreciation of the Biden Administration's commitment to conserving 30% of land in the US by 2030, including improving protections to forests - especially those that are mature and old growth. While the proposed National Old Growth Amendment (NOGA) improves mature and old growth protections, it does not go far enough, especially to protect forests in our region.

The NOGA must be improved in the following ways to best meet the Biden Administration's executive order 14072:

- * Halt cutting of mature and old-growth areas in national forests and stop the commercial exchange of old-growth trees. These forests are precious and are keys to carbon sequestration, biodiversity, soil health and more. These trees should not be cut and sent to the mill.

- * End logging in mature and old growth forest areas in moist forest types. The current DEIS fails to adequately acknowledge the history of disturbances and the precipitation and flooding patterns in the Eastern United States, instead focusing on drought conditions in the Western United States. Improvements to the NOGA must be made to adequately design forestry management at landscape scale for old growth forest characteristics in the Eastern half of the country, including Region 9.

- * Provide for landscape scale protection of forest areas containing old-growth and mature forest, requiring passive management of these landscape scale areas to promote old-growth forest characteristics.

The importance of managing for old growth forests at landscape scale, in the Eastern as well as the Western U.S., cannot be overstated, as a necessary means of preserving biodiversity and returning to a stable climate. The policy should recognize that increased levels of atmospheric greenhouse gases are caused by a failure of the natural climate regulation system due to human disturbances. Climate is regulated by forests, fields, wetlands and oceans and 95% of the greenhouse gas effect is from water vapor, not carbon dioxide and methane.

Accordingly, Earth's climate can only be stabilized when large expanses of old growth forests and other natural ecosystems are in place to effectively manage water and regulate climate.