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Organization:

Title:

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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, extinction event, and biodiversity loss.

The Sierra Club - Wisconsin Chapter represents over 14,000 members in the State of Wisconsin, which is in US Forest Service region 9. On behalf of our members and supporters, we are appreciative 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 trees 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 the cutting of old-growth trees in moist forest types and plan for climate mitigation in forestry management. The current amendment DEIS fails to adequately acknowledge the precipitation and flooding increases in the Eastern United States, instead focusing on drought conditions in the Western United States. Improvements to the NOGA must be made to better prepare forestry management in the Eastern half of the country for wetter, warmer weather.

Prioritize the benefits of old growth forests on climate resiliency and mitigation in our region (region 9).

Expand protections of mature trees and forests, especially in region 9. Only 1.1% of forests in the Upper Midwest are old growth. To expand the amount of old growth forests, mature trees must be protected so that they are able to grow to old growth.

Protect whole mature and old-growth ecosystems, which are critical for promoting biodiversity. These areas

include a range of plant ages and phases in the life cycle, all of which contribute to old-growth characteristics. Not only do individual trees need better protection and management, but full forests and ecosystems need these protections, too.

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.

Right now we have an unprecedented opportunity to protect forests across the country. We urge you to best take advantage of this opportunity to prioritize old and mature growth.

Sincerely,

Jan Kettle

Sierra Club - Wisconsin Chapter