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Organization:

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Comments: I support conserving old growth and mature forests that can be found on federal lands.

When you cut down old growth and mature trees they won't be replaced by similar growth for 100-120 years or more if ever. It is easier and less costly to preserve what we have instead of working to replace what is cut down. Mature and old growth forests hold carbon reserves that are crucial in the fight to save our planet from global warming. In addition these forests provide support for a wide variety of wildlife, many of which are struggling to remain viable because of a habitat that is constantly being reduced and fragmented.

Many of us are doing our best to support forested parks that are undergoing restoration work but cannot take the place of old and mature growth forests. I do volunteer restoration work for Dane County, Wisconsin Parks at Prairie Moraine Park in Verona, Wisconsin. This is a forested park of 172 acres including a recent 11-acre oak savanna restoration and a 12-acre pine area addition. Our work will not produce a mature or old growth forest for over a century! This is too long to wait and these individual efforts are too small. We must preserve U.S. mature and old growth forests now.

Wisconsin's old growth acreage was estimated as 77,205 acres in 2013 according to the Division of Forestry at the WI Dept. of Natural Resources 8/2014. The above effort at Prairie Moraine Park is 0.22% of the larger total, which is a minuscule effort. Wishing we can replace mature and old growth forests would require 449 small 172-acre efforts like Prairie Moraine is just spinning our wheels and is a herculean task here in Wisconsin.

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.

Sincerely,

Neil Lerner