

I am submitting my personal comments on the NOGA DEIS. It is important now more than ever for this forest plan amendment to recognize and protect our remaining old growth stands. But, the old-growth amendment needs to live up to its claim, and it also needs to recognize that a “one size fits all” concept for old growth protection and stewardship is not applicable to all forests. It should prioritize the value of old-growth forests as carbon sinks, critical fish and wildlife habitat, subsistence values, and for the cultural and traditional uses and values that provide a way of life and connect us to old growth forests.

I write personally and with passion about the Tongass National Forest in Southeast Alaska, and specifically Prince of Wales Island, where I have lived, worked, recreated, and harvested the bounties of this incredible temperate rain forest for over 40 years.

I was pleased to see the exemption for the Tongass NF removed in the DEIS, but hope the Tongass, with some of the largest remaining stands of old growth on this continent, receives consideration for its unique connection to the people who live here.

I support a ban on the commercial harvest of old-growth, with certain considerations for preserving a way of life that does utilize some old growth by indigenous and non-indigenous people. The old-growth amendment should:

- Review and avoid ambiguous language that still allows for large-scale commercial logging. The term “de minimus” leaves the door open for interpretation and exploitation. Get rid of it, and state specifically what would or would not be allowed. Many people living in the Tongass National Forest rely on personal use wood for heat, building supplies, and cultural and traditional uses, so these uses should still be allowed, as should providing some old growth for very small mills.
- Reduce the size of allowable clearcuts and timber sale volume to align more closely with community purpose and need.
- Eliminate the export of round logs. Old growth that is harvested for any commercial purpose should contribute a value added product.
- Closely monitor personal use wood. As more people move to and develop remote Alaska, there will be more demand for this wood. Management of it should look to protect valuable beach fringe habitat and other critical habit areas where much of the personal use wood comes from.

- Ensure that a way of life dependent on uses of the forest are protected too. There are several very small mills on Prince of Wales Island that still depend on harvesting some old growth through very small and micro sales.
- Encourage and facilitate the ability of small mills to utilize young growth.
- Recognize the value of passive stewardship. Even after decades of industrial logging, there still are stands of old growth in the Tongass National Forest. They do not all require active management or “proactive stewardship” to thrive, and in fact should be allowed to thrive as they have for hundreds of years. The final EIS should incorporate “passive stewardship” as a key strategy in preserving certain old-growth forests.
- Threats are not universal. In a temperate rain forest, wildfire is not the major threat to old growth forests, so managing for wildfires could mean removing vegetation (logging) that is completely unnecessary in the Tongass NF.
- The FS should not weaken the definition of old growth or apply Emergency Action Determinations that avoid objection periods just so logging of old growth can take place.
- Eliminate more land exchanges that select old-growth stands. Old growth logging on a fairly large scale still happens within areas that were once part of the Tongass National Forest. State forests and privately held land still clear-cut millions of board feet per year. Many of these sales target Western Red Cedar and export round logs, which should not be allowed.

I hope the USFS recognizes that the efforts to protect old growth will only work if our national forests remain public lands. Right now the Tongass National Forest could lose over 100,000 acres, much of it old growth, if Senate Bill 1889 and its companion bill H.R. 4748 pass into law during this congressional session. The work to protect what remains of old-growth forests must begin now and with a watchful eye on those who will want to privatize and log these vestiges.

I appreciate the time and effort it will take to review and analyze the many comments. I value that we still have a public process in place, and have some say in how our public lands are managed.

