

Data Submitted (UTC 11): 2/1/2024 1:43:02 PM

First name: Deborah

Last name: Sitarski

Organization:

Title:

Comments: The severe loss of biodiversity and the worsening impacts of climate change require solutions that match the magnitude of the threats we face. We need transformational change, not the status quo or incremental steps towards future outcomes. Done properly, this Nationwide Forest Plan amendment could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity, and we look forward to working with the agency to see this potential realized.

The EIS must analyze alternatives with significantly strengthened protections of old growth. As written, the amendment would still allow for numerous unacceptable exceptions for commercial logging of old-growth. The Forest Service should, with very limited exceptions, end felling of old-growth trees everywhere and cutting in old-growth stands where fire is infrequent. And, in all events, the amendment language must be strengthened to completely eliminate the commercial exchange of old-growth trees. We also urge the Forest Service to remove the Tongass old-growth logging exemption from any further analysis in the upcoming EIS. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072.

We also urge consideration of provisions to preclude reliance on arbitrarily restrictive definitions that artificially limit the amount of old-growth forests ultimately protected by the proposed action. The Forest Service should ensure the amendment requires definitions that are fully inclusive of all old growth conditions, simple, and easily operationalized in the field.

And, consistent with the recognition in the notice of the importance of expanding the distribution and abundance of old growth forests, we encourage you to consider in the EIS process alternatives for conserving mature forests and trees, including their value as future old growth. National forests in certain geographic areas, for example national forests east of the 100th meridian, have virtually no old growth left due to logging which makes protecting mature forests all the more important. While there are certainly other threats to our older forests to be addressed (such as wildfire), the agency-acknowledged threat of ecologically inappropriate logging remains wholly and directly under USFS's control.??