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Comments: Dear Chief Moore,

As a lifelong resident of the Pacific Northwest I have been privileged and blessed to have spent a great deal of time enjoying our extraordinary forests. If it were only for their beauty and biodiversity they would be of incalculable value. When we further consider the tremendous role that old growth and mature forests can potentially play in the mitigation of climate change that calculation of value becomes vastly greater.

Mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water and shelter wildlife. Logging these trees deprives us of the benefits and beauty of our largest, oldest trees.

The Draft Environmental Impact Statement fails to protect old-growth trees and forests. The proposal allows old-growth trees to be sent to the mill and allows agency staff to manage old-growth out of existence in pursuit of "proactive stewardship" goals. The draft also contains ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass National Forest.

The final record of decision should adopt a modified Alternative 3:

End the cutting of old-growth trees in all national forests and all forest types and end the cutting of any trees in old-growth stands in infrequent fire forest types.

End any commercial exchange of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill. (Alternative 3 includes a "no commercial exchange" provision.)

Remove the exception that allows for "de minimis" logging of old-growth trees.

Eliminate the agency discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals.

Cutting down old-growth trees to save them from potential threats is a false solution - they are worth more standing.

The draft also fails to protect mature trees and forests. Mature forests and trees - future old growth - must be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and rampant biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

We urge you to take this opportunity to protect our oldest trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores more than half a million public comments the agency received on last summer's advance notice of proposed rulemaking.

Sincerely,

Heather Ikeler

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