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Comments: The Forest Service should adopt a record of decision that is a strengthened version of Alternative 3 in the Draft Environmental Impact Statement-modified as recommended in detailed joint comments you are receiving from a coalition of national, regional, and local conservation and public interest organizations.

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 them deprives us of the benefits and beauty of our largest, oldest trees.

The Alternate 2 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.

As long as the forest service personnel from the District Ranger up to Forest Service Chief have timber targets, if a unit CAN harvest old growth/mature tree they WILL find a way to include them in their yearly timber targets. It is fine that Alternative 2 is taking OG/Mature forest out of programmatic timber harvest but to allow local units the flexibility to "Proactive stewardship" harvest OG/Mature trees will not protect OG/Mature trees from those wanting to pad their timber targets. If in doubt, take a look at this statement from the USFS: "the lack of large log milling may hinder restoration and other vegetation management activities to improve ecological conditions in or near old-growth forests." So, this is the USFS saying they only do revenue generating timber treatments - all cut trees need to go to a mill???? Insane.

I understand the knee jerk reaction of saying no harvest as in Alt 3, "what if we have to harvest" (oh my!) Then have a have a process outside of the local unit that can get all stakeholders agreeing on the process and don't send them to mills or at least don't allow the local unit to use them for their yearly targets!

Chief Moore said to congress that the USFS wasn't meeting timber targets or were held up in vital treatments because environmentalist. No, the issue is that local units are stretching current regulations to meet timber targets and they are not getting buy in from all stakeholders. And since an administrative appeal will go nowhere - why would a regional or Washington Office official override a local unit AFTER all the hard work, planning and decision at the local level? It is not human nature to not support those below you. And they have the same timber target on their yearly performance evaluations! So, Lawsuits[hellip] If the FS won very one of the lawsuits then it would be a different story, but that is not the case.

The final record of decision should:

1. End the cutting of old-growth trees in all national forests and forest types and end the cutting of any trees in old-growth stands in moist forest types.
2. 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.

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

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. They must be protected to aid in the fight against worsening climate change and biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

Failure to protect our oldest trees and forests undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores 500,000+ public comments the agency previously received.