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Comments: The current 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.

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.

**RBG**