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Comments: Thank you for listening to Southeast Alaska Tribes, municipalities and small business owners who requested that the USDA drop the language in the Notice of Intent that effectively exempted the Tongass National Forest from the same protections afforded to other forests. Unfortunately, the preferred alternative in the Draft EIS still does not provide adequate protections.

The updated language in the preferred alternative, intended to allow for implementation of the Southeast Alaska Sustainability Strategy, is ambiguous about allowable logging, which leaves room for exploitation and large-scale commercial logging of old-growth. Rather than using wording like 'de minimis,' more explicit language about exceptions would be more protective.

The purpose of the National Old Growth Amendment is to conserve old-growth forest conditions and recruit new old-growth in response to climate change. As our largest National Forest and greatest carbon sink, protection of the Tongass National Forest should be a top. Due to SE Alaska's low temperatures and high annual rainfall, the Tongass is at very low risk for wildfire, so it has a high likelihood of permanence and will continue to trap and store carbon in perpetuity. Also, trees here grow at a slower rate due to long winters and cold weather, so they do not regenerate as fast as trees in the contiguous U.S.

Commercial logging endangers fish and wildlife habitats, including:

* All five species of Pacific salmon, whose spawning and juvenile survival is impacted by stream health, and by the quality of the forest around it, which provides cover, water quality protection, and watershed stability. King salmon in particular are at a dangerous decline, and since other major rearing sites like the Taku River have been seriously imperiled by Canadian mine toxins, we need to preserve the old growth forests of the Tongass in their natural state.

* Sitka blacktail deer numbers have suffered in Prince of Wales because of the impacts of logging across the Island.

- Our national bird, the Bald Eagle, is prolific in the Tongass because of its old growth trees, which they prefer for safe nesting, and healthy fish populations in Tongass old growth.

Logging would negatively impact cultural and recreational uses, including hunting, fishing and foraging.

The elimination in the DEIS of Standard 1 from the original proposed action removes language that prohibits degradation or impairment of old-growth forests. Paired with language about management "for the purpose of proactive stewardship" and "no requirement that [old-growth] areas continue to meet the definition of old-growth

when managed for the purpose of proactive stewardship," the amendment would allow for management actions that could degrade old-growth stands to the point of no longer meeting the definition of old-growth, counter to the goal of the amendment.

The Tongass is too important standing to allow logging, even in parts that would checkerboard the forest and cause degradation from Old Growth functionality.