

Data Submitted (UTC 11): 9/18/2024 4:00:00 AM

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Comments: I urge the Forest Service to adopt Alternative 3, with the strongest protections for mature and old growth forests. There should be no commercial exchange of old growth trees, whatsoever.

Mature and old-growth trees and forests: absorb and store carbon, thus helping to stabilize climate and atmospheric chemistry; increase landscape-level resilience to fire; help to stabilize regional temperatures; filter drinking water; and shelter wildlife. Logging our largest, oldest trees deprives us of their benefits and necessity.

The proposal is based on the fallacy that old growth forests require management by humans. Old growth and never-logged forests, like other intact ecosystems, are self-managing. The proposal as written allows logging of old growth old-growth trees, and allows management that threatens and could eliminate our remaining old growth forests. 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. Large down logs have great ecological value to forest ecosystems and the biosphere as carbon storage, as habitat for wildlife, and nurse logs for young trees.

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

Because of the historical loss of old growth forests to rampant logging, mature forests and trees must be protected from the threat of commercial logging, to grow and become our future old growth. We need this future old growth to stabilize climate and sustain diversity in our biosphere.

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.