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Comments: The National Old Growth Amendment was introduced by the USDA as "a first-of-its-kind proposal to amend all 128 forest land management plans" to conserve old-growth forest conditions in response to climate change. So far, NOGA's good intentions aren't quite backed up by its language.

In its first iteration, in the Notice of Intent, the Tongass was effectively exempted from protections to allow for implementation of the Southeast Alaska Sustainability Strategy, unfortunately leaving room for exploitation and the potential for large scale commercial logging.

We did a lot of work behind the scenes to get the exception removed. We collaborated with Tribes and municipalities to adopt resolutions opposing the exception for the Tongass. We organized businesses to sign onto a letter, showing that our old-growth is more valuable standing than cut.

It looks like it worked. When we read the DEIS, the exception was no longer part of the preferred alternative.

But the devil's in the details and while the explicit exception was dropped as we requested, some other omissions and additions seem to still leave the Tongass at risk. There are some concerning contradictions and potential loopholes that need to be addressed for this amendment to live up to its goal of protecting old-growth.

Luckily, we're in the midst of a 90-day public comment period, allowing for further input on the amendment through September 20. We'll keep pushing and we hope you will too. There's hope for the next iteration in the Final EIS.

**COPY THIS TEXT FOR YOUR NOGA COMMENT:**

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.

With the purpose of the National Old Growth Amendment to conserve old-growth forest conditions and recruit new old-growth in response to climate change, protection of the Tongass National Forest should be a top priority as our largest National Forest and greatest carbon sink. Due to its low temperatures and high annual rainfall, the Tongass is at low risk for wildfire, so it has a high likelihood of permanence and will continue to trap and store carbon in perpetuity.

Larger-scale commercial logging endangers fish and wildlife habitats, including:

\* All five species of Pacific salmon, whose spawning is impacted by stream health, which is impacted by the health of the forest around it,

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

Island.

Larger-scale commercial 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.