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First name: Margaret

Last name: LovellFord

Organization:

Title:

Comments: Dear Chief Moore,

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

The Draft Environmental Impact Statement fails to protect old-growth trees and forests. The 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 National Forest.

The final record of the decision should:

? End cutting old-growth trees in all national forests and forest types.

? End any commercial exchange of old-growth trees. Even when an old-growth tree is cut (e.g., public safety), that tree should not be sent to the mill. It stays in the forest for natural breakdown, habitat, and insect use.

? Recognize the important role that old growth plays in fighting climate change, not just how they are threatened by climate change.

? Thinning in moist forests has been shown to not support the health of the forest or minimize fires. Ref: Role of Forest Ecosystems in Climate Change Mitigation

B.E. Law - Oregon State University, February 23, 2014

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

While I understand that some management may be necessary, commercial timber sales must be truly an afterthought to carefully planned and executed vegetation management. The possibility of a commercial timber sale should never be the driving factor for decision-making in old-growth forests, and commercial cutting of old-growth trees should not be allowed. Any active management should help mature forests develop into old-growth, protected forests, and passive management should also be used to meet these goals.

The draft also fails to protect mature trees and forests. Mature forests and trees - future old growth - must be protected from the threat of commercial logging to recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and rampant biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

We urge you to take this opportunity to protect our oldest trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores more than half a million public comments the agency received on last summer's advance notice of proposed rulemaking.

Sincerely,

M Lovell Ford, Washington