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Comments: TONGASS NATIONAL FOREST
DRAFT LAND MANAGEMENT PLAN EIS COMMENTS

I am writing to express my concern that the preferred alternative in the Draft EIS does not provide adequate protection of old growth forest on the Tongass.

The proposed role of the Southeast Alaska Sustainability Strategy still creates the possibility of large-scale timber harvest in old growth areas. Current language in the EIS is inadequate, as it is far too vague and leaves old growth areas vulnerable to logging based on the whims of next political regime.

The Tongass is the single most important National Forest in the US and requires the highest levels of protection. Here is why:

- 1)The Tongass is the largest temperate rainforest in the world
- 2)The Tongass contains the last reserve of habitat essential for spawning and rearing of 5 juvenile salmon species. Salmon fisheries along the Pacific coast from California to Washington have been decimated over the last 50 years due to a variety of factors. Loss of freshwater habitat is at the top of that list, and much of that occurred on Forest Service Lands and aquatic habitats throughout the Western US. The Tongass has already sustained considerable destruction of freshwater forest habitat due to a long legacy of logging. That destruction of habitat must not be allowed to continue on the Tongass. The time for it to stop is now.
- 3)Original peoples of Southeast Alaska still rely heavily on the lands and waters of the region which are now identified as the Tongass National Forest, for their traditional subsistence foods. Their right to sustainable, healthy food is of highest importance, especially considering their history of experiencing colonialism and dispossession from their homelands across Southeast Alaska.
- 4)The Tongass is a massive carbon sink. Forests throughout the Pacific Northwest have been burning recently at unprecedented rates as climate change leaves them drier and much more vulnerable to fire. Protecting those Forest Service old growth regions from logging is imperative, but in no way guarantees their continued existence. The Tongass, in northern latitudes with cooler temperatures and continued higher annual rainfall, is more likely to avoid destruction by wildfire, and therefore has the best chances of surviving in perpetuity, but only if humans quit logging them.

Elimination in the DEIS of Standard 1 from the original proposed action is especially problematic due to weak language which would not clearly prevent degradation or impairment of old-growth stands. 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," is categorically unacceptable. The possibility of managing old-growth stands to the point of no longer meeting the definition of old-growth, is absurd and in full conflict with the stated goals of the amendment.

Now is time for the Forest Service to fully recognize their critical responsibility to prevent further destruction of the world's largest temperate rainforest. The Forest Service must immediately implement the highest levels of protection for old growth forest on the Tongass by using unambiguous language in the upcoming Land Management Plan.