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Organization:

Title:

Comments: Randy Moore, Chief, U.S. Department of Agriculture's Forest Service

Angela Coleman Associate Chief, U.S. Department of Agriculture's Forest Service

Dear Mr. Moore and Ms. Coleman

I am writing to request that you ensure a robust National Old-Growth Amendment through strengthening the protection of old growth forests and mature forests that will develop into the next generation of old growth with a strong.

Old-growth trees are the backbone of our ecosystems. They

\* help filter the water in rivers, creeks and streambeds. In my neck of the woods, of the Willamette Valley and the middle-Cascade mountains, old growth forests help filter the water in the McKenzie River which supplies the drinking water for my city. As the saying goes, "there are alternatives to oil. There are no alternatives to water," making this function essential for all life.

\* absorb pollution from the air

\* create shelter for wildlife

\* store planet-warming carbon in their trunks, branches, and roots, which is good in a climate changing world

\* provide shade and a beautiful sight for us.

With all these benefits, they are worth protecting well!

Unfortunately, the Draft Environmental Impact Statement (DEIS) (<https://www.fs.usda.gov/managing-land/old-growth-forests/amendment>) fails to sufficiently protect old-growth trees and forests. The proposal allows old-growth trees to be sent to mills and allows USFS 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. These are unacceptable provisions.

The DEIS also fails to protect mature trees and forests. Mature forests and trees - future old growth - must be protected from future commercial logging in order 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 worsening climate change and biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth. We have precious little old-growth remaining in North America, and the only chance we have to restore what was lost is to protect our mature forests so that they can grow.

Please enact durable protections for old-growth as well as mature trees and forests. The final record of decision should:

1. End cutting old-growth trees in all national forests and forest types and stop harvesting any trees in old-growth stands, particularly in moist forest types.
2. Establish protections for mature forests and trees to increase the amount of old growth for the future.
3. End 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 be left in its ecosystem to provide valuable organic matter/ecological services.

Thank you for protecting our oldest trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores 500,000+ public comments the agency received on last summer's advance notice of proposed rule making.

Thank you very much.

Sincerely,

Charlotte F Young PhD, Oregon