

Good day. My name is Shalynn Pack and I am a Certified Wildlife Biologist, Oregon native, university educator, and frequent user of our National Forests. Much of my personal recreation is on National Forests: I hike, camp, and forage with my family on these lands monthly. I am a former USFS employee and child of USFS retirees, I frequently collaborate with the USFS in my current job, and I am overall well versed on USFS' mission, policies and activities. In my free time I volunteer with Cascadia Wildlands to support protection and restoration of our forest lands. I am a parent and care deeply about protecting and restoring our National Forests for their future enjoyment and learning.

Please accept these comments on the proposed Northwest Forest Plan amendment, which is both exciting to me, and also very concerning. This amendment will affect my daily life and the future of my children's lives as Oregonians. We cannot manage our National Forests with the same policies we established in the 1990s – the context has changed entirely.

Recreational use has grown immensely along with our state population and tourism, and meanwhile logging has decreased and become less and less justifiable. The public wants our National Forests as healthy forests to recreate in, rather than to log. Logging and milling technologies have changed so drastically that there are few jobs created by harvesting our National Forests, and our rural communities that were once supported by timber jobs are now more supported by tourism (or, they lack economic opportunities entirely). The climate has also changed and I've witnessed many of my favorite National Forest campsites and backpacking routes be burned by intense wildfires in just the past five years. August used to be my season to backpack in the high Cascades, and now it's smoke season.

Given climate change, the intensity of wildfires, our improved understanding of forest ecology and the ecosystem services provided by healthy forests, and shifting public values, I ask the US Forest Service to prioritize conservation of mature trees and stands, climate change mitigation and adaptation, wildfire resilience, and tribal inclusion in the new NWFP.

Our national forests should be a safeguard of healthy and intact ecosystems, as they are situated within a landscape of heavily logged, degraded, and otherwise altered and disturbed lands, and within the broader global context of a changing climate. In the Pacific Northwest, our National Forests are still heavily logged due to Congressional board foot mandates that don't correspond to local desires. The Willamette National Forest still proposes massive harvests year after year, despite very little local appetite for these sales, and high local demand for recreation on those same lands. And then, our National Forests are surrounded by private forests that are also heavily logged. What we are left with is a checkerboard landscape of clear cuts and new growth forests, which don't provide even a fraction of the ecosystem services that an old growth forest provides, and that our forests are meant to provide. Restoration of our salmon runs has also been incredibly slow due to the degraded state of our forests. Many communities' drinking water sources are affected by logging, with rural people paying the price for logging harvests that don't even financially benefit them. Several Oregon town governments have had to enter significant debt to pay for new drinking water systems after their current natural filtration systems were destroyed by erosion and runoff caused by legal logging. With the loss of our healthy forests, the public has lost drinking water sources, recreation activities and access, healthy salmon runs, healthy wildlife populations, hunting opportunities, climate regulation, protection from wildfires, and overall, our natural heritage.

Our national forests are classified as protected areas, and they must be exactly that - protected. They must be healthy forests sustaining and maintaining these ecosystem services, safeguarded areas within the broader landscape of degradation. The public values healthy ecosystems, clean drinking water,

climate regulation, and recreation opportunities more than ever before. We now understand how our activities affect climate change, wildfire propensity, and local climate regulation. The public wants its national forests to be protected and maintained as healthy forests.

If a full cost-benefit analysis of USFS logging were completed including the ecosystem services that intact mature forests provide, I'm confident that we would halt logging on our public lands, in favor of protecting them. Any change to the NWFP should recognize the wide variety of social and economic benefits National Forests provide for local communities and the region as a whole, not just timber. Outdoor recreation on public lands is a growing industry, employing more than 140,000 people, whereas the timber industry has a declining fraction of Oregon's economy. Every other industry benefits from the second-paycheck provided by the high quality of life in the Pacific northwest. Logging shrinks that second-paycheck.

Less than 1% of our old growth remains. We cannot afford to lose any more, and we must set a strong legal mandate now to restore old growth by protecting mature forests. I specifically ask the USFS to legally protect and retain all remaining old growth forest and mature forest that includes trees over 80 years old. This should be enforced down to the individual tree. Mature forests are more resilient and resistant to fire. These forests should be protected, and diverse, resilient forests restored in areas that are currently dense, uniform plantations. President Biden's 2022 Executive Order gave the FS clear guidance that it should prioritize the protection and restoration of mature and old-growth forests (trees generally over 80 years old) across the nation as a natural carbon and climate solution. The NWFP governs the largest natural carbon reserves found in North America and the amendment must prioritize increasing carbon storage.

To adapt to climate change, any NWFP amendments should increase ecosystem resilience to an uncertain climate by (1) reducing environmental stressors like logging, road building, invasive species, and off-road vehicles; (2) establishing connecting corridors for wildlife migrations; and (3) providing high-quality habitat as refugia for climate-sensitive fish, wildlife, and plants. Amendments should also prioritize safeguarding the vast amount of forest carbon that makes the region's National Forests critically important in fighting climate change. The climate and biodiversity crises require the immediate retention and enhancement of carbon storage and habitat on our national forests. Short-term losses of carbon storage cannot be justified by hoped-for recruitment decades into the future, as we are currently at a global tipping point for atmospheric carbon.

In the amended NWFP, I ask the USFS to meaningfully include and collaborate with tribes in novel ways. The Forest Service should go beyond Tribal "engagement" and seek Tribal inclusion in the amendment process. Establishing good communication and trust with Indigenous communities takes time and, while it's good to see recognition by the Forest Service that the original Northwest Forest Plan was severely lacking by not meaningfully engaging the Tribes, the truncated process and shortened timeline for completing the Plan amendment may well undermine any current need and desire for meaningful inclusion. I mentor and teach many tribal students, and understand the importance of changing the paradigm to move beyond consultation towards real inclusion and peer-level participatory engagement.

I thank you for your consideration of my comment. I and my family will be affected by your management decisions for National Forests both today and in the coming decades.

Shalynn Pack
Certified Wildlife Biologist