

Dear Jacqueline Buchanan US Forest Service, Regional Forester for the Pacific Northwest Region,

Please accept this comments on the proposed Northwest Forest Plan amendment. These forests are important to me as a source of clean water, fish and wildlife habitat, recreation, and personal renewal. I also know how essential they are for storing carbon and mitigating the effects of climate change.

The majority of these comments are lifted directly from comments submitted by Cascadia Wildlands, where I am a volunteer field checker. I am including them because I agree with them and they are well stated. Cascadia Wildlands is a regional environmental organization focussed on protecting and improving the remaining wilderness in Oregon and the Cascadia bioregion. This is for the sake of the plant and animal organisms that depend on them, the water we drink, and the value of MOG as a carbon sink.

In addition, I have some comments of my own informed from my time in the last six years visiting most of the FS and BLM projects on the west side of the Cascades from Salem south to Grants Pass. As you know, NEPA, the original NWFP, and the BLM RMP guide much of what happens on public land in this area. Here, numbered, are my personal specific comments:

1. Proper designation and review of Mature and Old Growth (MOG) forest:

The scientists who were instrumental in creating the original NWFP made a real effort to use only good science and exclude commercial incentives from the process of creating the original maps and HLB vs. LSR designations, and they believed they were successful. However, in most FS and BLM projects I have found MOG forest that was mistakenly or otherwise designated HLB and young plantation designated LSR. Under some circumstances it may make sense for

young plantation to be LSR, for example to create links reducing habitat fragmentation, but it NEVER makes sense for MOG forest to be designated HLB. There is so little of that type of forest left that it should ALL be preserved. For that reason, if there are new maps and changed land use designations in the Amended NWFP, there should be ample public comment period so we can put boots on the ground and verify what's actually there. Relying completely on FS and industry records is insufficient.

2. Better consideration of cumulative impact:

The FS has been somewhat successful at properly considering cumulative impact of forest treatment measures in areas where all adjacent land is also FS administered. However, in areas where there is adjacent private timberland FS plans have often failed to take the treatment of that land into consideration when considering cumulative impact as it relates to continuity of habitat and also protection of riparian resources. This is particularly true in FS lands adjacent to O&C timberland.

Additionally, since BLM land use is now governed by their RMP rather than the NWFP, it is important that the actual status of adjacent BLM land, and what is called for in the RMP be included in considerations of cumulative impact. The fact that the BLM will issue revised RMPs out of synch with revisions to the NWFP means that the Amended NWFP needs to be a "living document" that can revise land use designations depending on changes in adjacent BLM or private lands.

Likewise, the expected increase in larger climate change driven wildfires which we are already seeing means, again, that the situation on the ground is not static and will change during the life of this amended plan. The new plan should be written in a way that allows appropriate revision, with public comment and NEPA process, as the existing situation changes.

3. No more massive landscape plans and inaccessible units:

The FS and BLM in the last decade have been creating massive landscape plans to which to apply the NEPA process. These plans are short on details and often contain units that are inaccessible for review because nearby roads are gated and the units are surrounded by private land so that accessing them requires trespassing and then invalidates submitted comments. And they are routinely so large that it is impossible to properly review them on the ground within the open comment period, particularly if we have to request special access and then wait. This Catch-22 is completely unacceptable and likely unlawful. The amended NWFP should have limits on the size of landscape plans and require that access to proposed units is readily available.

4. Proper geolocated maps need to be readily accessible online:

The way maps are provided for FS projects is inconsistent and often virtually useless. Bundling multiple maps inside a scoping or EA document with no way to access them individually and retain the geolocation information is counter to the intent of the public comment rules. If there are multiple maps associated with a project, they should be individually listed on the project website and every one geolocated. This should require virtually no extra effort as they must already exist in this form for FS planning purposes.

Thank you for the opportunity to comment on the proposed amended plan and I hope you will take my comments, informed by on-the-ground experience, in the constructive spirit intended.

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The following is the letter created by Cascadia Wildlands. I concur with the comments in this letter.

The Northwest Forest Plan continues to be instrumental in keeping the Cascadia bioregion a special place through the restoration of forests and watersheds damaged by irresponsible past logging and road building, recovery of economically and ecologically valuable salmon runs, protection of wildlife habitat and old-growth forests, and ensuring our National Forests are part of a natural climate solution.

I am concerned that the Forest Service is using a rushed and abbreviated planning process for this amendment. This plan is important, and in order to maintain and strengthen its ecosystem-based conservation goals, the agency should use a transparent, science-based approach that includes and reflects public values, allows for meaningful Tribal consultation, and prioritizes climate resilience and the needs of future generations.

In crafting an amendment to the plan, I hope you will consider the following:

- President Biden's 2022 Executive Order on forests and the climate gave the Forest Service clear guidance to 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 Northwest Forest Plan governs the largest natural carbon reserves found anywhere in North America, and an amendment must recognize and safeguard the vast amount of carbon that can be sequestered and stored in these forests. The general direction to conserve trees over 80 years old in designated reserves has begun to reverse the loss of old-growth to logging, which has turned Forest Service managed Pacific Northwest public forests from a carbon source to a carbon sink. However, not all of these older forests were protected under the plan, and every timber sale emits carbon to the atmosphere. The plan amendment should protect all mature and old-growth trees and forests.
- Preserving biodiversity and connected wildlife habitat across the region should be a core principle of any forest plan revision. This

includes not only threatened species, but others that have been impacted by the loss and fragmentation of their habitat, and those awaiting state and/or federal Endangered Species Act listing decisions.

- The amendment 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, but also clean water, climate stability, quality of life, and outdoor recreation.
- In light of the removal of public forests managed by the Bureau of Land Management from the Forest Plan's regional reserve system, new information about the importance of older forests for the climate, and the ongoing needs of wildlife for habitat connectivity and dispersal, any amendment should enhance protected, connected, and redundant reserves by including all mature and old-growth forests and core wildlife areas without roads (1000 acres or larger). The reserve network, including riparian reserves, should have clear and enforceable limits on logging and road impacts.
- Fire resistance and resilience can be bolstered by preserving and restoring mature and old-growth forests. Fuels and fire management should focus on the home ignition zone and on non-commercial treatments and beneficial fire use, not commercial logging. Indigenous cultural burning and wildland fire use should be prioritized. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, introduce invasive species, and create hazardous fire conditions. Standards must ensure that fuel reduction is both needed and effective before logging is allowed.

In short, we need a strong forest plan that incorporates modern science and public values, robust and honest tribal consultation, and the needs of future generations.

Thank you for your consideration.