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February 2, 2024

Comment on the Revision of the Northwest Plan

Dear members of the Northwest Forest Plan (NWFP) Federal Advisory Committee,

At a time when we are facing the consequences of unprecedented climate change and wealth inequality, we urge you to focus on a long-term vision, not short-term “practicalities.” At the center of the revision we must place sustainability and the preservation of biodiversity as well as the long-term health and wellbeing of local communities.

We also urge the Advisory Committee to work with other agencies to remove bureaucratic allowing for implementation of effective fire prevention strategies, drawing from the wisdom of traditional Native American communities who have lived in harmony with their environment.

### **Ecological Context**

Sustainability and biodiversity must be the standards for oversight of forests covered by the plan revisions considered by the United States Forest Service for the Pacific Northwest. Sustainability in regard to our forests must be understood as a complete ecosystem framework that accounts for sensitive habitats, protection of water resources, health of wildlife populations, and impacts on human communities. It is not the same thing as commercially-driven “sustainable logging”, which often amounts to “tree farming” on public lands.

Biodiversity in regard to our forests must be understood in a broad fashion in terms of its ecosystem roles and its potential in restoration ecology. It requires a holistic understanding of the environmental, evolutionary, economic, and cultural processes that add up to sustain life on Earth.

Climate change and the growing complexities of the human-forest interface provide a number of challenges to protection and restoration of forests. Fire is a growing threat in many areas unaccustomed to periodic fire. Water resources are under threat in many areas and will likely face continued pressure.

### **A Vision for the Future**

The forested areas under consideration here represent an incredible natural and cultural resource for the people of the Pacific Northwest and the United States. These forests provide essential ecosystem services that reduce greenhouse gases, retain water and soil, harbor wildlife, and provide recreational opportunities. These forests also have the potential to support greater biodiversity and enhanced ecosystem stability and resilience.

We therefore call upon the United States Forest Service to advance a revised plan that accounts for the following:

1. Centers the plan on protection of all old growth and mature forests within the areas covered by the plan, including:
  - Protection of steep slopes and roadless areas from all logging
  - Set ambitious goals to increase old growth and mature forest stock by 2050
  - Plan to connect forest reserves and core wildlife areas with protected areas or corridors
  - Ban all logging in old growth areas, even post-fire.
  - Remove bureaucratic barriers for implementation of traditional, Native-American inspired controlled burns.
2. Elevates recognition of water resources in forest management, including:
  - Protection and enlargement of forested watersheds that produce larger and cleaner amounts of water
  - Increase riparian protection standards and require 70% canopy coverage in areas that provide, or could provide, salmonid habitat if protected from water warming
  - Prioritize protection of forest watersheds that provide drinking water
  - Study the use of “catchments” in suitable forest areas in order to capture run-off precipitation in order to recharge aquifers.
3. Recognizes the distinct character and needs in different areas under the plan, including
  - Inventory ecosystem services provided by forests and associated riparian areas
  - Identify unique fire control and controlled burn areas
  - Enhance cooperation with tribal governments and other public partners to achieve shared goals

Sincerely,

Dennis Boyer, on behalf of the  
State Coordinating Committee  
Pacific Green Party of Oregon