



LANE COUNTY AUDUBON SOCIETY

AN OREGON CHAPTER OF THE NATIONAL AUDUBON SOCIETY

P.O. BOX 5086 • EUGENE, OREGON 97405

www.laneaudubon.org

Dear Regional Foresters Buchanan and Eberlien,

Please accept these comments concerning the Northwest Forest Plan Proposed Amendments. I am writing on behalf of the Lane County Audubon Society. Our members value our forests for their natural beauty, ecosystem services, and habitat provided for birds and other wildlife.

We incorporate by reference the comments submitted by Bird Alliance of Oregon and other Audubon chapters in Oregon and Washington. Those comments directly address the five needs put forth for amendments and offer scientifically based arguments and recommendations. Rather than repeat the specifics and reference the scientific studies here, we wish to reiterate that the proposed amendments as presented will cause unacceptable harm to the forests and its inhabitants, and to the ecosystem services provided by the forests.

Although much of the Siuslaw, Umpqua, and Willamette National Forests fall within our county borders, our members frequently recreate throughout the Northwest, enjoying hiking, bird watching, photography, and other outdoor activities. We are concerned that the proposed amendments critically increase logging on public lands and open up formerly protected mature and old-growth trees to commercial logging. We are alarmed by the proposed change in definition of protected stands and strongly urge that forest stands 80 years and older remain protected as “mature” and “old-growth” stands.

Multiple scientific reports have affirmed that we are losing biodiversity at an alarming rate. We ask that preserving biodiversity and habitat, protecting imperiled species, and protecting and restoring riparian areas and watersheds be a core principle of any forest plan amendment. Increased logging and road building will further reduce critical habitat and connectivity.

Older forests store massive amounts of carbon and we urge the inclusion of Natural Climate Solutions strategy to maximize gains in carbon storage and sequestration.

Older forests are more resistant and resilient to wildfires. The proposed increase in logging and disturbance of older forests would exacerbate the wildfire problem, not resolve it. Fire management activities should occur near to at-risk communities but should not be prescribed forest wide.

We object to any argument to dramatically increase logging for economic reasons given that the Forest Service’s own report stated that outdoor recreation and tourism contributes more jobs and



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money to the economy than does logging. The FEIS should include an analysis of the impact of logging on tourism and recreation, economics of communities associated with this activity, and estimates of the loss of ecosystem services such as clean water.

We strongly support the components of the amendment that call for tribal inclusion. But this action should not be tied to dramatic reductions in conservation measures.

The Northwest Forest Plan, though not perfect, has largely been successful. The overwhelming evidence for the climate and extinction crises calls for strengthening the Plan to meet the Forest Service's obligations to protect our last remaining mature and old-growth forests, to safeguard imperiled species, and to ensure the ecosystem benefits provided to all of us.

Thank you for your consideration,

Debbie Schlenoff, Ph.D.

Conservation Chair

Lane County Audubon Society