

Data Submitted (UTC 11): 1/4/2024 5:00:00 AM

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Comments: PNWFP Amendment input:

There are several issues I think need to be addressed in this Amendment.

Firstly, are you going to ensure that all proposed projects are carbon neutral over the course of the rotation? Forests have an inherent value beyond simply converting them to boards. They store significant quantities of carbon sequestered from the atmosphere. And they also sequester additional every year with their added growth.

Secondly, all proposed forest management projects impact water flows and yields. These impacts to water quantity-flows and yields affect the forests water holding capacity. These changes should be modelled and quantified with current technology for all proposed projects.

Thirdly, fire in the forest. Whether it be from lack of budgets, lack of personnel, lack of training and/or political will, the Forest Service dropped the use of prescribed fire as a management tool in the early nineties. It doesn't really matter when; now public forests are burning up every year with increasing size and intensity due in large part from a failure to implement prescribed fire as a management tool at a landscape level. There are at least 16 positive attributes of fire in the forest.

Fourthly, forty years ago career foresters with the USDA Forest Service needed to be in silviculture to advance. These last 30 years have seen the emphasis move from silviculture to wildland fire and if a career forester wanted to advance, they had to migrate to a wildland fire program somewhere. So, the application of actual forest management practices did not happen for decades. The strategic effect of this was that our primary agency responsible for national forest management and forest research and training became custodians rather than managers. As mere custodians, our forest system has declined in health, growth, and yield as well as carbon sequestration potential. Our Amended Forest Plan needs to include more robust tools to once again, emphasize actual management with prescribed treatments. And one of our most important, but neglected tools is the use of prescribed fire. is one tool in a silviculturist's toolbox and we have neglected it for decades.

I saw an effort in the Siuslaw Forest where the prescription was to create openings and simulate older growth forests in stands that were clearcut and planted 40 years ago. Any effort to rebuild the stand structure and forest structure as well as age class distribution in these 40-60-year-old plantations needs to be a slow, multi-generational process. Give these second growth forests an opportunity to exhibit natural disturbance regimes and then re-build structure on those natural processes.