

Data Submitted (UTC 11): 1/12/2024 12:06:13 AM

First name: Benton

Last name: Elliott

Organization:

Title:

Comments: Please accept my 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 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 considering my comments.