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Comments: To: Jacqueline Buchanan, US Forest Service, Regional Forester for the Pacific Northwest Region;

Thank you for including my comments as part of the scoping period for the proposed Northwest Forest Plan amendment. The Northwest Forest Plan is something I feel personally invested in, as I used it as part of a dissertation I wrote for the University of Southern California in 1994: "How shall we think about loggers and owls? Principles for an applied environmental ethic." My research used the Northwest Forest Plan as a practical example of how to balance incommensurate values such as jobs and biodiversity.

The climate crisis is now at the center of all environmental ethical considerations, as climate chaos threatens biodiversity AND jobs, along with health, beauty, and the moral imperative of preserving a livable future for future generations. Old growth forests are more essential than ever for their role in mitigating and adapting to the climate crisis. Accordingly, I am in agreement with the recommendations of the Portland Metro Climate Action Team:

- \* Oregon has only 10% of patchy old growth and some of it is pinyon/juniper which is less helpful for carbon stores. Hence protection of mature forests and trees in the NWFP bioregion is essential to build up old growth and mature reserves to 50% stock by 2050.

- \* Since BLM forests have been removed from the Forest Plan's regional reserve system any amendment to the plan should have clear and enforceable limits on logging and road impacts. The amendment must have clearly protected, connected, and redundant reserves by including all mature and old-growth forests and core wildlife areas without roads (1000 acres or larger).

- \* All old growth must be off limits for logging even post-fire.

- \* Select areas of mature forest, preferably the vast majority, that are more resilient (less susceptible to insect infestation and drought and with better water resources) and make logging off limits immediately by providing them with GAP 1 protections (essentially wilderness area level)

- \* Immediately protect all roadless areas and steep slopes from any logging.

- \* Place a moratorium on mature tree logging.

- \* Our western, wetter forests do not need thinning to prevent wildfire. Understory and small trees grow too fast to be an effective strategy for less common east wind events that caused the westside 2020 wildfires. Instead, we need to focus on fire hardening our homes and communities near forestlands.

- \* Set up sidebars for any fire prevention strategies that includes protecting the larger trees by rule and protecting riparian areas on the eastside or southern forests.

- \* Intact forests are cooler, less impacted by drought and more fire-resistant. We residents of Portland understand personally the importance of preserving the Bull Run watershed. Prioritize drinking watersheds for the strongest protection to advance mature forests to become old growth.

- \* Increase riparian protection standards and require 70% canopy cover in all forested areas that contribute to salmon habitat both upriver and down to protect temperatures that are still dangerously high.

\* Forested watersheds produce cleaner and larger volumes of water without flooding.

\* Preserving biodiversity and connected wildlife habitat across the region should be a core principle of any forest plan revision. Please include not only threatened species, but also those pending for listing under the Endangered Species Act.

Environmental ethical issues have grown far more challenging in the 30 years since I wrote my dissertation, and the Northwest Forest Plan is more important than ever. I urge your team to adopt the provisions listed above to protect mature and old growth forests to uphold the moral imperative of preserving a liveable habitat for future generations.

Thank you,  
Roberta Richards