Data Submitted (UTC 11): 1/24/2024 6:26:42 AM First name: Kathleen Last name: Preston Organization: Title: Comments: Dear Jacqueline Buchanan US Forest Service, Regional Forester for the Pacific Northwest Region,

The forests of the Northwest is where I come from. My ancestors were cowboys and indians, fur traders and farmers. My parents raised me with an appreciation for the natural world. We spent every summer hiking, fishing, camping and backpacking. As a child of the 1980's, I witnessed the ravages of forest management in Northwest forests. The massive clearcuts, the removal of scores of remaining old growth groves, the destruction of vital habitat - it hurt me to the core. What we do to the forest, we do to ourselves. Thankfully, the NWFP adopted in the 1990's began a process towards a more sustainable forest management that put value on clean water, wildlife, and old growth. The world has seen much change in the last 30 years and I do think this revision is necessary.

Thirty years later and now I am a mother, bringing my child to seek the wild places the Northwest has to offer. The emotional trauma I experienced growing up hasn't gone away, it has changed. I don't just fear for myself, I fear for the future. I fear for the many threatened and endangered plants and animals. I fear for the collapse of ecosystems as we lose keystone species. I fear for clean water and clean air. I fear for the very survival of my daughters generation due to an increasingly unlivable world, a heating climate. I am not the only one and I don't live in a rural town that depends on logging as an industry. I live in Eugene, OR, and my families future sustainability depends on how the NWFP chooses to manage forests. I am a part of the afflicted Community. Like the forest, we are all connected in unforseen minute ways, and climate change lifts the veil between our differences. When the earth suffers, we all suffer. A policy amendment of the NWFP should recognize the interconnection between Climate Change and Community Wellbeing. The boundaries of the afflicted Community must be broadened to acknowledge the climate impact forest practices have regionally and globally. Increased smoke particulate, increased erosion into drinking water sources, and ultimately less capacity to store carbon which fuels warming are some of the impacts that affect a regional community.

## **Community Wellbeing**

Regardless of climate change, the NWFP should include communities who are emotionally, financially, spiritually and physically burdened by damage done by logging practices. It is exclusive to only value the financial impact of those who work in the logging industry. As a person who has spent countless volunteer hours trying to prevent destructive cutting proposals and to hold agencies to their own laws, I have sacrificed my own financial wellbeing. Many people in our community live a lower quality of life due to the excessive time that must be directed at preventing ecological demise. My emotional and spiritual health has been damaged knowing that agencies use the NWFP to put money over the longterm wellbeing of planet, people and wildlife. It is easy to put a price tag on the financial worth of forest resources and see how that affects logging industry and jobs, but it's not so easy to quantify cultural, emotional and spiritual worth of a forest. That doesn't mean we can ignore it. There is a value in forest beyond resource extraction. In order to truly find this value we need to start leveling humans with humans and take the industry out of it. Humans, not corporations, will be the ones to suffer 50 years from now when our lungs are clogged with smoke, our sacred species are extinct and there are no jobs because our earth is unlivable. Industry gets an unfair advantage, in that it is rewarded financially when its lobbies are successful. Humans fighting to protect land from logging are financially burdened whether or not they are successful. An amendment of the NWFP should not allow corporations or industry as stakeholders or collaborators.

The original NWFP's goal was to strike a balance between logging and habitat protection, but that balance is increasingly hard to keep in a warming world. The NWFP must be amended to prioritize the longterm well-being of humanity and ecosystems over logging jobs and board-feet goals because our existence depends on it. Progress is not a right, but the right to life and a stable climate is. An unstable climate means extreme weather, fire and flooding all of which imperil vulnerable species and threaten human health.

The NWFP can begin to achieve these climate goals by amending the plan to:

-Increase the acreage protected for endangered and threatened species, as well as increase wildlife corridors and habitat connectivity.

-Significantly increase buffers along streams including small wetlands and seasonal springs to protect drinking water and aquatic life.

-Increasingly limit logging on slopes especially above streams.

-Replant logged areas with a greater diversity of tree species and shrubs, including trees species adapted to drier climates, to prevent fire and increase habitat

-Preserve all remaining groves and individual trees over the age of 80 years old to sequester carbon, prevent fire, and provide vital habitat. Mature forests are also more fire resilient.

-Comply with all federal and state climate goals/laws as well as global climate targets

-Reduce environmental stressors like logging, road building, invasive species, and off-road vehicles

-Fuel reduction should be located near communities and focus on non-commercially treating small fuels. Logging commercially viable trees as fuel reduction tends to decrease a forests' resilience to fire by removing fire resistant trees, generating hazardous slash, making the stand hotter-drier-windier, and stimulating the growth of surface and ladder fuels.

## **Tribal Inclusion**

We know the NWFP has fallen disastrously short of true tribal inclusion and this revision must put tribes into a collaborative partnership on all levels. Time and again, state and federal agencies include tribal voices in the comment and review period of NEPA only to file a ROD against overwhelming tribal outcry. The agencies have made it protocol to "include" but not actually acknowledge tribal needs. This has resulted in devastating cultural harm to sacred sites, cultural resources, tribal ability to retain traditional ways and excessive loss to culturally significant species. As well, this method had done a number on tribal and agency relationships. It is time to change this dynamic by amending the NWFP.

First and foremost, tribes are sovereign nations, forest lands that are within traditional homelands should be managed collaboratively with tribes. Within the NWFP land base, tribes have been severely limited due to inadequate reservation size that does not reflect the full diversity of foods and landscape types of traditional homelands. Tribes should be leveled with equal representation to Regional Foresters in making the final ROD as well as at all levels of the decision making process of NEPA, including but not limited to; the approval of one or more proposals to amend the NWFP, in the review of alternatives and public comments, in the consideration of environmental consequences and in the documentation of the finding in the EIS and ultimately in the final ROD associated with this NWFP and all NEPA'S within traditional homelands.

One of the most dire inadequacies of previous NEPA processes, is that Regional Foresters have fallen short on properly evaluating "substantive adverse affects" on tribes. Maybe we are asking too much of Regional Foresters. How can one culture fully understand the ramifications on another? This is why tribes should be decision makers alongside Regional Foresters in the ROD. In the case that there is a finding of "substantive irreparable harm" to tribes, the NWFP should be amended to necessitate the elimination of that proposed alternative. This failsafe and others similar will ensure that tribes are included in a meaningful and binding way, not just lip service.

## Mature and Old Growth Ecosystems

Mature and old growth trees are some of our best defenses to climate change, they store large amounts of carbon, are fire resilient and provide essential habitat to threatened species. The NWFP governs the largest natural carbon reserves in North America. An amendment to the NWFP should prioritize increasing carbon storage, and thus increase the amount of protected mature and old growth acreage. The NWFP can achieve this by allowing more younger groves to reach maturity and permanently protect existing trees over 80 years old. An amendment should also enhance and strengthen the NWFP reserve network by protecting all unroaded areas larger than 1000 acres to provide for wildlife habitat needs. These areas are ecologically significant and rare on the landscape due to human activities that have degraded and fragmented the landscape. The reserve network should have clear and enforceable standards limiting logging and road building. The reserve network needs to remain spatially connected to facilitate dispersal of spotted owls and other wildlife, and must remain redundant to accommodate natural disturbance regimes.

Opportunities for non-timber products that benefit Community Wellbeing:

-Increase to trail systems both bike and foot travel especially in the coast range to increase tourism. -Allow for conditional use permits for recreational guides to bring tours in hiking, wildlife viewing, bicycling and backpacking on established roads and trails. This should include codifying "leave no trace" ethics that CUA holders must abide by to ensure the forest does not get loved to death.

-Promote ancient forest tourism like California does with Redwood trees. Preserve remaining stands and individual trees over 80 years old and create trail systems to view. Increase signage to access groves and provide informational kiosks with biological importance of ancient forest ecosystems.

-Co-manage with tribes forests on traditional homelands. This will help Tribal communities with food security, cultural practices, and financial wellbeing through increased oppertunity.

-Increase safety of travel for bicycle travel from major cities to coastal communities to promote bicycle tourism. Bicycle tourism helps our carbon footprint and also helps revitalize rural communities because bikes must stop more frequently in small towns to buy food, resources, and lodging.

-Remove blocks on roads that access public land leased by logging industry. The public would be more apt to visit these forested areas for tourism and wild foods collecting if so many roads were not blocked by locked gate imposed by logging companies.

Yes, these are big changes to the NWFP, but our changing world demands it. We can adapt, learn to thrive and prevent the most catastrophic impacts of climate change or we can keep forcing a profit driven, resource extractive, industry led forest management, but we really can't do both anymore. Are we going to choose a livable future for our children and all earth's inhabitants or a short-term financial goal? I think the NWFP should be a leader in the United States and around the world for modeling a climate sane policy. It's time to prioritize life over money.