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Comments: RE: Scoping comments on proposed amendment to Northwest Forest Plan #64745

Dear Jacqueline Buchanan, Regional Forester for the Pacific Northwest Region

Please accept these comments on the scoping for the proposed Northwest Forest Plan (NWFP) amendment. As long time residents of Oregon the NWFP has been critical in stopping indiscriminate logging and protecting the remaining Old Growth trees that we have. Mature and Old Growth (MOG) forests are critical for sequestering carbon, providing critical habitat for wildlife, filtering pollution and water for healthy streams and drinking water, and providing recreation and respite in an increasingly busy world.

As stated in the Notice of Intent, the amendment will focus on five interrelated topic areas, so our comments will be under each of these topics.

1.Improving fire resistance and resilience across the NWFP planning area,

This should focus on fire preparedness in communities and along the built edge of forests, not on logging within the forests. Fire is a natural process and logging does nothing to mitigate fire risk, in fact it opens more land to human-caused fires through road building and access, as well as introducing invasive species which often increase fire risk. In addition to community preparedness, focus on closing existing roads within the forests, restoring native vegetation, and protecting our naturally fire-resistant mature and old growth forests.

2.Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change,

Protect all mature and old growth forests. This is the best way to adapt to climate change, by keeping all our big trees as carbon sinks, allowing younger trees to mature for future old growth and carbon sequestration. We would like to see strong wording that protects MOG and does not have loopholes for logging under the guise of "adaptation".

3.Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old growth ecosystems and supporting regional biodiversity

Please take a holistic/landscape approach to achieve this. In addition to protecting what we have, please focus on expanding and connecting reserve areas, riparian areas, MOG and roadless areas. Connectivity of habitats is critical for biodiversity and for climate change resilience.

4.Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities, and

This is a worthy goal.

5.Providing a predictable supply of timber and non-timber products, and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources.

This is particularly concerning as it seems to provide a huge loophole for logging. Communities have been transitioning from logging large trees since the NWFP was first put in place. Economic opportunities should arise from restoration of the forests and watersheds, not more logging. The only logging should be to thin "plantation"

style single-species forest lands to increase diversity and forest health. Providing a "predictable supply" should be the focus of private timberlands, not our national forests, and especially not MOG forests.

As a final comment we would like to see enforceable standards and clear language in any changes to the NWFP to ensure compliance with President Biden's Executive Order 14072 to conserve and restore old growth forests.

Thank you for the opportunity to comment.