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Comments:

NORTHWEST FOREST PLAN AMENDMENT

Thank you for this opportunity to comment on the Northwest Forest Plan Amendment. I'm concerned the amendment weakens the plan's protection for the habitat of spotted owls, marbled murrelets, and many other species dependent on old-growth or ancient forests.

Please revise the plan to focus on the values of big trees and ancient forests for capturing and storing carbon and for biodiversity in a time of an extinction crisis. This is not a side note. This is a critical value and our knowledge is far greater than in 1994. Right up there with carbon and biodiversity is the spiritual value of these forests for people and future generations.

In many ways the 1994 Plan worked well with the reserves of protected old-growth-but it left out important stands that are still threatened by logging and some have been lost to the chainsaw. If it's not broken why fix it? And if it's working well, why not expand reserves? The BLM's current logging of old-growth makes this even more important to stop the bleeding-even as people like me will speak up to help stop the BLM's felling of centuries-old trees.

Armed with so much more knowledge of the carbon capturing significance and biodiversity, the Forest Service has an opportunity to be bold on behalf of true protection. Reserves are reserves-and now they are strategic carbon reserves for the future of our planet. Be vigilant in preventing incursions from logging. Honor the complexity of these forests. Fund and study the ecology. Monitor but do not interfere. And please do not use the public's fear of wildfire as an excuse to go into these precious forests and "restore" them with chainsaws. Instead, focus on community preparation for wildfire.

The amendment should protect old growth as well as mature forests-the future old growth. This is more important than ever with high temperature and wind-drive wildfires burning through some of our few remaining old-growth forests---fires that nothing but late fall rains put out. The best way to help the older forests resist fires is to stay out of them. The older trees are naturally resistant to wildfires and do far better than younger logged forests-with the caveat that when the winds are gusting 50 mph and temperatures are 100 degrees, nothing will stop a fire. The threats to our protected forests mean we must allow our mature forests to grow so there will be more habitat available for wildlife, large trees for carbon storage, and as sources of clean water, shade, filtering pollutants, and of spiritual renewal, too.

The lessons of the northern spotted owl now threatened by barred owls finding their way into Northwest old-growth forests should serve as a warning. While the protections for the endangered owl under the Northwest Forest Plan were overall a tremendous success story for keeping these highly biodiverse and carbon-storing forests standing for owls and entire ecosystems, here's one key takeaway. The solution cannot be about short-term solutions of killing barred owls.

We need more not less endangered spotted owl and marbled murrelet habitat-more forests that can become old-growth and connected wildlife corridors between them for many species, especially as our climate warms and our developments harm more wildlife than ever before.

We also need far more life-history studies of all the interconnected wildlife, including the importance of nearby forests after wildfire that are intact and not "salvage" logged. (See "Disentangling Post-Fire Logging and High-Severity Fire Effects for Spotted Owls" <https://www.mdpi.com/2673-6004/2/2/11>).

I have one big question. I'm puzzled by the inclusion of some east-side forests in the Northwest Plan. While I'm in favor of expanding the reach of the plan, adding in dry-side ponderosa ecosystems seems to then allow the Forest Service to put in language in the Plan that shores up justifications for logging. I'm fine with adding in more forests but only as true reserves with highest levels of protection. Why was this done?

The 1994 Northwest Forest Plan was one of the best policies we've ever had for our few remaining and threatened ancient forests. But it did not go far enough. Please assure this revision takes us to the next level with more reserves, including mature forests, prioritizing carbon storage of large trees and biodiversity, and strengthening protections. Be decisive and clear without exceptions.