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Comments: This letter includes my scoping comments on the Northwest Forest Plan (NWFP) Amendment. The U.S. Forest Service (USFS) needs to propose forward-looking forest management policies, plans, and projects suitable for climate resiliency, carbon sequestration, wildfire mitigation, Indigenous stewardship practices and land sovereignty, and recreation compatible with those outcomes.

In the midst of intersecting climate, wildfire, and biodiversity crises, the NWFP should focus on Indigenous land use privileges, enhancement of native habitats, and restoration of native habitats degraded by settler colonial stewardship practices to help protect communities and restore ecosystem resilience.

The following are my views on the key issues that should be included in the NWFP Draft Environmental Impact Statement (DEIS):

## CLIMATE CHANGE and MATURE/OLD-GROWTH FOREST ECOSYSTEMS

Mature/Old-Growth (M/OG) forests are a natural means of absorbing and storing carbon to mitigate climate change. They are more valuable for climate recovery and the many ecosystem services they provide than they are as marketable timber in commodity markets.

The gravest threat to M/OG forests is a revival of commercial logging under the ignorant claim that logging will protect rural communities from wildfire or restore forest resilience. The DEIS must analyze the vital, irreplaceable role of M/OG forests in mitigating climate change and propose permanent protection from logging in all existing M/OG stands.

## TRIBAL INCLUSION and FIRE RESILIENCE

Indigenous cultural burning was a vital means of sustaining resilience in fire-adapted forest and grassland ecosystems. Settler-colonialism forcibly removed Native peoples and prohibited their land stewardship practices, causing immense harm to National security.

As a matter of environmental justice, Tribal representatives and Indigenous perspectives must have greater influence in the NWFP than special interest groups who represent resource extraction interests. The DEIS must analyze the effects of bringing back Indigenous cultural burning and other land stewardship practices to restore fire resilience, and compare these with the impacts of the agency's ongoing wildfire suppression and fire exclusion.

## COMMUNITY SOCIOECONOMIC SUSTAINABILITY

The economy of the Pacific Northwest has diversified over the last 30 years, and logging is no longer the dominant industry. Rural communities that formerly depended on timber-related jobs are struggling, but there is tremendous potential for sustainable jobs in long-term ecological land stewardship including fire and fuels management, traditional silviculture methods and compatible outdoor recreation that DEIS should analyze.

## **BIODIVERSITY**

Concern for endangered species like the northern spotted owl drove the original NWFP, and needs to be a key topic for the NWFP amendment. Amidst a global biodiversity crisis, it is imperative that the DEIS add biodiversity as a key topic. My favorite forest animal is the mountain beaver.