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Organization:

Title:

Comments: RE: Comments on the Revision of the Northwest Forest Plan

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

As a father and long-time resident of the Pacific Northwest, I am writing to support strong revisions to the Northwest Forest Plan. Specifically, to protect our old-growth forests to the maximum ability that is possible.

Why do I care? I see climate change every day out my window: heat waves, drought and smoke from fires during the summer and warm winter weather that made the daffodils break ground in late December this season. The trend is a negative one that the grand majority of scientists warn will continue. Some say it's too late. I believe that even if it is too late, we should not run headlong into the fire but take every opportunity to mitigate risk. This includes protecting what ecological balance and carbon sinks we have in our forests.

In particular, the Pacific Northwest forests can take up and store more carbon than any forest in the world. That is why you must include President Biden's goals of 30 percent protection of mature and old growth forests by 2030 in the guiding principles of the amendment. The U.S. is a signatory to the IPCC which calls for forest protection as a major solution in mitigating climate change risks.

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).

The primary specific means of strengthening the Northwest Forest Plan are:

1. All old growth must be off limits for logging even post-fire.
2. 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)
3. Immediately protect all roadless areas and steep slopes from any logging.
4. Place a moratorium on mature tree logging.
5. 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.
6. 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.
7. Prioritize drinking watersheds for the strongest protection to advance mature forests to become old growth.
8. 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.
9. Forested watersheds produce cleaner and larger volumes of water without flooding.
10. 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.

Please help us to reduce the numerous impacts of climate change by making the Northwest Forest Plan as strong as it can be.

Sincerely,
Eric R. Miller
Portland, Oregon