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Title: Vice Chair

Comments: Dear Pacific NW Regional Forester Buchanan:

Please accept this comment as part of the scoping period for the proposed Northwest Forest Plan (NWFP) amendment (Federal Register, Vol. 88. No. 243). We are writing as the Oregon Democratic Party Environmental Caucus representing our goals and values as a party.

We are pleased that the U.S. is a signatory to the Glasgow Leaders' Declaration on Forests and Land Use along with 141 countries at the COP26. The declaration pledges to end global deforestation and forest degradation by 2030. In keeping with that pledge and to implement President Biden's Executive Order 14072, we are pleased to have the opportunity to call for strong protections for both old growth and mature forests and trees in the amendments to the NWFP.

We feel that addressing climate change is an emergency. The IPCC notes that protecting these forests is the least cost method to mitigate climate change. Here in Oregon the rate and severity of drought is increasing wildfires, air pollution and heat waves.

The forests of this region are essential as a source of clean water, fish and wildlife habitat, recreation, and personal renewal. Moving ahead with preservation will add jobs in recreation, preservation work such as road-removal and tree planting, and many jobs needed for monitoring of carbon storage and best practices that is all supported by science.

The Pacific Northwest forests can take up and store more carbon than any forest in the world. That is why including President Biden's goals of 30 percent protection of mature and old growth forests by 2030 is essential in the guiding principles of the amendment. Oregon has only 10% of patchy old growth and some of it is pinyon/juniper which is less helpful for carbon stores. The current plan allows for logging in old growth and in all areas of mature forests. Hence 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).

Specific components should be evaluated when designating areas to chose and activities allowed in specific areas.

?All old growth must be off limits for logging even post-fire.

?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

?Immediately protect all roadless areas and steep slopes from any logging.

?Place a moratorium on mature tree logging when non-commercial thinning is needed in eastern or southern regions.

?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.

?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.

Intact forests are cooler, less impacted by drought and more fire-resistant. In fact, in areas in the Blue Mountains, the forest floor can be 12 degrees cooler than unprotected areas. This makes it essential to maintain at least a 70% canopy cover in all forested areas that contribute to endangered species and especially salmon both upriver and down to protect temperatures that are still dangerously high.

Our drinking watersheds are at risk when clearcut. Detroit lake was undrinkable due to an an algal bloom several years ago, that was spurred by warmer water runoff and higher nitrates due to fertilizer use. We need to preserve the strongest protections to drinking watersheds. Forested watersheds produce cleaner and larger volumes of water without flooding.

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.

We strongly appreciate inclusion of Tribal consultation in the planning process and in advancing on the ground management. Thank you for including their perspective in the advisory committee but additional consultation could be sought.

The Northwest Forest Plan continues to be instrumental in keeping the Pacific Northwest a special place through the restoration of forests and watersheds damaged by past logging and road building, recovery of economically valuable salmon runs, protection of wildlife habitat and old-growth forests, and ensuring our National Forests are part of a natural climate solution.

Warm regards,

Catherine Thomasson, MD  
Vice Chair, Oregon Democratic Party Environmental Caucus