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Organization:

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Dear Jacqueline Buchanan US Forest Service, Regional Forester for the Pacific Northwest Region

As a longtime resident of southern Oregon, please accept these comments on the proposed Northwest Forest Plan amendment. These forests are important to me as a source of clean water, fish and wildlife habitat, and recreation, and I also know how essential they are for storing carbon and mitigating the effects of climate change. Here are key considerations for the changes to the NFP:

* The amendment must protect and conserve mature and old-growth trees and forests in both moist and seasonally dry forests. While the NFP reserved many older forests in 1994, it did not protect them all, which has led to controversy among stakeholders. In light of the removal of BLM forests from the Forest Plan's regional reserve system, new information about the importance of older forests for the climate, and the ongoing needs of wildlife for connected habitat, any amendment to the plan should enhance protected, connected, and redundant reserves by including all mature and old-growth forests and core wildlife areas without roads (1000 acres or larger). The reserve network, including riparian reserves, should have clear and enforceable limits on logging and road impacts.

* The plan amendment should protect all mature and old-growth trees and forests. President Biden's 2022 Executive Order on forests and the climate gave the Forest Service clear guidance to prioritize the protection and restoration of mature and old-growth forests (trees generally over 80 years old) across the nation as a natural carbon and climate solution. The Northwest Forest Plan governs the largest natural carbon reserves found anywhere in North America, and an amendment must recognize and safeguard the vast amount of carbon that can be sequestered and stored in these forests. The general direction to conserve trees over 80 years old in designated reserves has begun to reverse the loss of old-growth to logging, which has turned Forest Service managed Pacific Northwest public forests from a carbon source to a carbon sink. However, not all of these older forests were protected under the plan, and every timber sale emits carbon to the atmosphere.

* The amendment must recognize and address the effects of climate change, particularly the increase in very large and severe wildfires. While the NFP considers the essential role that wildfire plays in our forests, the size and severity of wildfires has far exceeded expectations. The Forest Service should reassess current management strategies in light of escalating wildfire threats and consider incorporating Indigenous cultural burning practices. In general, consultation with local Tribal Nations and incorporation of Indigenous Knowledge will be critical steps for the Forest Service to take in amending the Northwest Forest Plan.

* Conservation of the northern spotted owl, marbled murrelet, and native salmonids was a cornerstone of the 1994 NFP, and an amendment should maintain and enhance protections for all at-risk fish and wildlife such as the coastal martin. The NFP amendment should bolster efforts to recover wildlife, recognizing the ongoing threat of climate change and past management practices. To protect biodiversity in the era of climate change, the amendment must ensure habitat resilience from disturbances such as wildfire, drought, disease, and insects. Protecting older forest will help with the recovery of the northern spotted owl. The barred owl has invaded the entire range of the northern spotted owl, and now competes with spotted owls for food and territory. Biologists tell us that we need to protect more old forest habitat to increase the chances that these two owl species can co-exist.

* Preserving biodiversity and connected wildlife habitat across the region should be a core principle of any forest plan revision. This includes not only threatened species, but others that have been impacted by the loss and fragmentation of their habitat, and those awaiting state and/or federal Endangered Species Act listing decisions.

* Fire resistance and resilience can be bolstered by preserving and restoring mature and old-growth forests. Fuels and fire management should focus on the home ignition zone and on non-commercial treatments and

beneficial fire use, not commercial logging. Indigenous cultural burning and wildland fire use should be prioritized. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, introduce invasive species, and create hazardous fire conditions. Standards must ensure that fuel reduction is both needed and effective before logging is allowed.

* The amendment should recognize shifts in our region's socioeconomic landscape since 1994. While forest management will always be a part of the Pacific Northwest economy, recreation and other pursuits now draw more people to our region than ever before. Building a modern forest restoration workforce will contribute to ecological resilience of our National Forests.

* This plan is important, and in order to maintain and strengthen its ecosystem-based conservation goals, the agency should use a transparent, science-based approach that includes and reflects public values, Tribal concerns, and the needs of future generations.

* Amendments should recognize the wide variety of social and economic benefits National Forests provide for local communities and the region as a whole, not just timber, but also clean water, climate stability, quality of life, and outdoor recreation.

* Amendment needs to expand Riparian Reserve sizes. It has been determined by the type of water they protect, have proven insufficient in many cases and have been decreased against the recommendations of scientific studies. Logging is frequently permitted in these highly sensitive areas under the guise of improving the riparian forest.

* Aquatic Conservation Strategy (ACS): The ACS designated buffer zones along waterways in areas where management must focus on maintaining aquatic values, and where roads or logging should receive increased scrutiny to avoid impacts to aquatic species. Activities within riparian reserves and Key Watersheds must be guided by a Watershed Analysis. However, the ACS has not proven adequate in preventing the extinction of salmon. Protections in Key Watersheds and Riparian Reserves are weaker than envisioned by the NWFP. Watershed analyses often fail to recognize unstable land areas or the importance of reserves to spotted owl dispersal between LSRs (as required by the plan). The areas surrounding small wetlands are also not being protected as promised.

As a resident of southwest Oregon with its diversity conifer forest any amendment must address the difference between the eastside dry forest and the Westside seasonal dry forest especially when it comes any management action.

Thank you for this opportunity to provide comments on the Forest Service's

Sincerely,

Romain Cooper