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Comments: I am writing to comment on the Intent to Develop Northwest Forest Plan Amendment.

1. I would like to see the Northwest Forest Plan revision process foreground an environmental justice analysis. As a starting position here, please see Chapter 10 of Spies, T.A.; Stine, P.A.; Gravenmier, R.; Long, J.W.; Reilly, M.J., tech. coords. 2018. Synthesis of science to inform land management within the Northwest Forest Plan area. Gen. Tech. Rep. PNW-GTR-966. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station: 809-849.

I would like environmental justice to inform the approach to climate change, water futures, old growth forest management, and recreation. I would like to see collaboration with noted professionals working on environmental justice and public lands management (especially those engaged with questions of environmental racism and tribal sovereignty) be key partners in this process.

2. I would like the Northwest Forest Plan Amendment process to engage in best practices for transparency and inclusion. I recommend you consult Megan Rangel-Lynch's undergraduate honors thesis in Environmental Studies at University of Oregon (Spring 2023) for best practices. Rangel-Lynch focuses on forest plan revision processes, but her findings are applicable here.

3. I would like the Northwest Forest Plan Amendment Process to engage thoughtfully and substantially with co-management, tribal sovereignty and cultural burning. Co-management should be the lens rather than co-stewardship.

4. Forests provide a wealth of ecological and economic benefits. Commercial timber harvest should not be prioritized. The social and economic benefits to communities of clean water, climate resilience, quality of life and outdoor recreation must be substantially valued. Supporting diverse rural workforces outside of the commercial timber industry is important.

5. Additionally, I would like to see the Northwest Forest Plan Amendment prioritize the protection and restoration of mature and old-growth forests. This is essential for habitat and ecosystem resilience in the face of climate change as a carbon reserve. Remaining old growth and mature trees should be protected.

6. In regards to fires and fuels specifically, I'd like to see the NWFP prioritize tribal management and co-management strategies. Any USFS management should focus on home ignition zone, non-commercial treatments, and beneficial fire use. It should not include commercial logging. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, and create hazardous fire conditions. Standards must ensure that fuel reduction is both needed and effective before logging is allowed. Focus should be on resilient communities and protecting communities, not the type of commercial logging that may actually increase risk.

7. I am additionally concerned about preserving biodiversity and connected wildlife habitat (especially in the face of habitat fragmentation). I would also like to see more attention to wetlands preservation in the amended plan.