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Comments: In crafting an amendment to the plan, we hope the Forest Service will consider the following points:

President Biden's 2022 Executive Order on forests and the climate gave the Forest Service clear guidance that it should 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 in turn has turned PNW lands managed by the Forest Service 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 plan amendment should protect all mature and old-growth trees and forests.

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 pending for listing under the Endangered Species Act.

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.

In light of the removal of BLM forests' removal 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.

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. 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.

In short, we need a strong forest plan that addresses modern science and public values, tribal concerns, and the needs of future generations.