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Comments: Re: Northwest Forest Plan Amendment #64745

Based upon over 40 years of experience as either a wildland fire fighter, a biologist in the field during the implementation of the first NWFP, and a private forest owner burned over by the Holiday Farm Fire of 2020, I have the following comments on the amendment:

- 1) This amendment does not adequately differentiate between the management needed on federal and private forest lands.
- 2) This amendment does not adequately differentiate between the management needed on dry and wet sites.
- 3) This amendment does not adequately differentiate between the management needed in mature or old growth stands versus young forest stands.
- 4) In addition, the amendment does not adequately differentiate between the management of naturally propagated stands and those planted in an industrial forest silviculture-mode (single species, regular spacing, etc.), especially with the effects of climate change becoming apparent.
- 5) This amendment does not adequately address the continued urgency to provide for old growth dependent species and riparian habitats.
- 5) Hence, much of the management proposed does not apply to broad swaths of forest land in Western Oregon and Washington or Alaska. In fact, because the NWP was originally proposed to be adaptive management, the continued decline of many old growth dependent and aquatic species is a strong argument for these species to take precedent over extractive activities. Any benefits garnered to fire protection or habitat enhancement from tree thinning or more road building would be elusive, if not imaginary in the areas outlined above.