Data Submitted (UTC 11): 2/20/2025 1:12:24 AM

First name: Jacob Last name: Lee Organization:

Title:

Comments: Thank you for your work in revising the Northwest Forest Plan (NWFP) and for providing an opportunity for public input. As an engaged public land steward and [hiker, backpacker, forager, wildlife enthusiast, etc.], I am deeply concerned about elements of the proposed amendment that would weaken protections for mature and old-growth forests and expand commercial logging.

I urge you to make the following changes to ensure the final plan prioritizes ecological integrity, climate resilience, and Indigenous stewardship:

1. Strengthen Protections for Old-Growth & Dry Mature Forests

The proposed changes in Forest Stewardship - Late-Successional Reserves (FORSTW-LSR-MOI) weaken protections by increasing the allowable logging age from 80 to 120 years. This change threatens critical habitats and carbon storage. The plan should retain the original 80-year threshold and ensure no timber harvest occurs in moist forest stands older than 80 years?

The shift from stand age to stand establishment dates (FORSTW-MTX-MOI) could allow younger mature forests to be logged before aging into protected status. This loophole should be removed to ensure future old-growth recruitment?.

The proposed exemptions for salvage logging in Late-Successional Reserves (FORSTW-LSR-MOI-STD-02) should be tightened. Logging should not be permitted under the guise of "restoration" unless it directly enhances late-successional habitat?.

2. Recognize Forests as Climate Solutions

The NWFP should prioritize carbon sequestration and climate resilience over commercial logging. Expanding harvests under Economic Sustainability Objectives (ECONSUST-OBJ-01-B) contradicts climate goals by increasing carbon emissions from logged forests?.

The plan should emphasize protecting old-growth forests as carbon sinks, which are irreplaceable in mitigating climate change.

3. Ensure Meaningful Tribal Collaboration

The increased focus on Tribal co-stewardship (TRIBAL-FORSTW-ALL) is commendable. However, these provisions should not be used to justify increased logging under the guise of "forest restoration"?.

The plan should explicitly support the restoration of culturally significant species, such as beargrass and huckleberry, and increase funding for Indigenous-led conservation initiatives.

4. Strengthen Safeguards Against Loopholes

The proposed plan lacks strong guardrails to prevent excessive logging, especially in forests not at significant fire risk. Logging allowances for "young" forests in Matrix lands (FORSTW-MTX-MOI-GDL) should be more clearly defined to prevent overharvesting?.

The plan downplays the long-term damage of increased logging and does not adequately assess the cumulative ecological impact of these changes. More detailed analysis is needed before expanding timber harvests?.

The NWFP should prioritize ecological health over short-term timber industry profits. I urge the Forest Service to strengthen protections for mature and old-growth forests, remove loopholes that enable excessive logging, and shift wildfire mitigation strategies toward community-based solutions.

Thank you for considering my comments.