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Comments: The proposed changes to the NWFP move this Plan in the wrong direction in several regards. I disagree with the proposal to shift in practice to using stand establishment date instead of stand age to determine protection of old growth stands in the Pacific NW. This change does not, as claimed, improve wildfire resiliency. There is significant research-based evidence that mature forests are much more fire resistant than plantation, or clear-cut replanting, stands. In addition, the mature stands' ability to sequester large amounts of carbon is a significant natural, thus cost-neutral, climate solution.

The proposed changes also claim to be in the interests of economic security. However, many economic studies have shown the decline in economic returns to communities, as a result of both mechanization of harvesting and processing lumber, as well as the reduced demand. On the flip side, communities in the Western states that are in proximity to federal forest lands actually experience sustainable economic and employment growth as a result of recreation and tourist opportunities.

Thank you,  
Diana Avery