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Comments: I'm writing from Port Angeles where I've lived since before the original NWFP was drafted. I frequently drive through older clear cuts enroute to the many wonderful hiking trails in Olympic National Forest, especially its wilderness areas. I also enjoy mountain biking, and watching salmon in the low elevation rivers. I've also watched the Northern Spotted Owl population decline despite the plan, especially with the rapid spread of barred owls. I've watched marbled murrelet habitat outside the LSR lands protected by the plan decline, taking the population with it. And then there are all the other less charismatic, but still important old-growth associated and dependent species that the plan has helped protect for 30 years. It was so refreshing to see a management plan that used science as its basis, but in a changing climate, I get the need to revisit it. However, because none of the alternatives reflect the combination of approaches I support, I hope the chosen path takes aspects of different alternatives.
I'm glad to see:
1)Inclusion of tribal consultation, use of indigenous burning and youth education, and the possibility of co-stewarding. Fire inclusion should use the best fire ecology science and traditional knowledge.
2)The recognition of fire as an essential ecological process and the difference between fire ecology in the wetter moist forest types like here on the Olympic Peninsula, and the drier east-side forests. While our Fire Return Interval and stand-replacing fire history in the moist forest were not as impacted by a century of fire suppression, it will be good to reintroduce prescribed/cultural burns in the dry forests and perhaps in limited places for early seral habitat diversity in moist forests.
Things I'd like to see changed:
1)Strengthen protection of mature forest outside the LSRs and don't raise the protected age to 120 or 150 years from 80-years old. These 80-120-year-old forests will be the next old-growth and will help meet multiple goals for water supply and biodiversity protection. So many communities on the Olympic Peninsula, including mine, get their water from the federal lands upstream. This is also essential for protecting our beleaguered salmonids.
2)Given the rapid acceleration of climate change, faster than model predictions, and the associated impacts on forest mortality, native and non-native forest pests, shrinking Olympic glaciers, drier summers, etc., retaining older trees and protecting forests soils for their efficient and inexpensive carbon sequestration is a no brainer. Not cutting our hard-working trees is easier than planting a trillion trees! I learned that our old forests in the PNW can have more biomass than even tropical forests. Let's keep it working for the climate crisis.
3)The increased severity of winter storm events and atmospheric rivers has wreaked havoc on our local infrastructure. Protecting older forests can help moderate floods, and not logging those areas helps retain and protect water flows and lower summer water temperature, so essential for fish survival.
4)Given the damage to soils, carbon storage and increased risk of hotter and windier fire conditions, do not allow salvage logging or thinning in older matrix lands or the fire-resistant older forests in the LSRs. The associated road building increases the risk of human-caused ignitions and spread of non-native plants. If there's salvage logging post-fire, large snags should be left for structural diversity and wildlife use. Retaining standing dead trees adds shade, safe sites/microclimate with moisture when they fall.
5)For the reasons in #4, minimizing conventional high impact fire suppression techniques (bull-dozed lines, too-hot back burns, retardant, etc.) should be minimized. Also, inappropriate thinning/logging in the guise of climate resilience/community protection should not be allowed, especially in wetter forests. In the dry forests where suppression may have resulted in closed canopies in some locations, such thinning may be needed, followed with ecological burning for understory ladder fuels. But in the moist forest patches within eastside forests, logging would increase fire risk,
6)Use ecological fire/prescribed burning wherever possible. Though carbon is lost with fire, research shows much more is lost through harvest.
7)I was glad to see an emphasis on community/home hardening since we know that the majority of acres burned are in extreme fire weather events and they've burned right through "treated" areas, even clear cuts, not to

mention much of the West's burned acreage is in non-forested habitat like grasslands and shrublands. However, the 1-mile buffer seems excessive. Please use the best fire science to guide these actions, not pressure to harvest. It is so much more efficient to use our tax dollars to help homeowners take defensible space steps to protect their homes than to waste them in ineffective thinning, especially in the face of shrinking budgets.
Thank you for the opportunity to comment.
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