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Comments: I am urging the Forest Service to REJECT the current proposed amendment to the Northwest Forest Plan. Alternative B (the Proposed Alternative) and Alternative D options in the Draft EIS would extend the threshold on logging from 80 year stands to 120 in moist forest and 150 in dry forest. This is devastating to old growth stands and conflicts with the foundational objective for the forest plan to protect endangered species like the Marbled Murrelet, Northern Spotted Owl, and Humboldt's flying squirrel that depend on closed-canopy old-growth forests for survival. I urge the U.S. Forest Service to retain the threshold at 80 years.

The Draft EIS relies on flawed justification that logging and thinning in mature west-side moist forests will reduce fire risk, but current scientific evidence refutes this. The best way to minimize fire risk and increase climate resiliency is to let moist forests grow and develop canopy closure, and to limit fuels in the immediate vicinity of homes, buildings and other vulnerable infrastructure.

None of the alternatives in the Draft EIS make any real progress on carbon sequestration and in fact, they would reverse the progress that has been made. USFS should prioritize Natural Climate Solutions including longer forest rotations, leaving mature and old-growth trees on the landscape and managing for higher forest complexity to sequester as much carbon as possible.