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To Whom It May Concern:

I live in rural Oregon. My wife and I own and manage a forest, and have been involved in forestry in the Pacific Northwest for many decades.

The Forest Service's proposed amendments to the Northwest Forest Plan (NWFP), as they stand, are flawed, some more seriously than others, but several contain elements that if combined could contribute to practices beneficial to Northwest forests, communities, and our region's longterm economic viability.

Four alternative amendments have been proposed. Three of them (B, C, and D) could greatly expand logging in ways all but certain to result in loss of mature and old-growth trees and stands, restrict environmental review, and sideline public involvement in decision-making.

The only amendment that does not increase logging is "Alternative A - No Action". It would retain current NWFP protections. However, Alternative A does not address wildfire, or support Tribal involvement in forest management.

We need a sound and sensible amendment that takes into account the single most important service that Northwest Forests provide: these forests contain the largest natural carbon reserves in North America. Amendments that favor immediate profits may create brief, local booms, and make a few individuals rich, but are all but certain to harm future generations. Unfortunately carbon sequestration gets only a few sentences in hundreds of pages pertaining to amendments. The emphasis on carbon sequestration needs to be much stronger.

Building on this, a sound amendment should expand protections for mature and old-growth trees and stands. The definition of mature and old-growth forests should remain at 80 years, not be increased.

Drop all bad-faith proposals, such as to allow logging for the benefit of early serial species in LSRs.

The amendment should have a Tribal inclusion plan.

Management to decrease fire risk should not be used as a cover for logging practices that decrease carbon sequestration. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, and create hazardous fire conditions. Fire resistance and resilience can be bolstered by preserving and restoring mature and old-growth forests. This should be made explicit in an amendment.

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