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Comments: For over 30 years, the Northwest Forest Plan has protected Oregon's mature and old-growth forests and the wildlife that depends on those forests for survival. It largely halted the unchecked clearcutting that threatened precious old growth forests and drive species to extinction - and that ignited the timber wars. Now the U.S. Forest Service is proposing an amendment to the Plan that prioritizes and accelerates logging, and puts our forests, fish, wildlife, clean water, and climate at risk.

The current NWFP designates Late Successional Reserves (LSRs) as locations where old growth forest habitat should be protected and recovered. Within LSRs, forests older than 80 years are typically protected from logging. Alternative B (the Proposed Alternative) and Alternative D options in the Draft EIS (DEIS) would change the age of the protected forests from 80 years to 120 years in the west side wet forests and to 150 years in the east side dry forests. These proposed changes are unacceptable and would conflict with the foundational objective for the forest plan to adequately protect endangered and sensitive species like the Marbled Murrelet, Northern Spotted Owl, and Humboldt's flying squirrel that depend on closed-canopy mature and old-growth forests for survival. I urge the U.S. Forest Service to retain the threshold at 80 years.

The DEIS relies on flawed justification that logging and thinning in mature west-side moist forests will reduce fire risk. 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. Fire management only needs to occur within the fire danger or "ignition zone" near at-risk communities and other human infrastructure. The most effective way to reduce the threat of wildfire to communities is to treat fuels in the immediate vicinity of homes, buildings and other vulnerable infrastructure.

None of the alternatives in the DEIS make any real progress on carbon sequestration and in fact, backtrack on what could be gained. The USFS needs to 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. As stated in the USFS Forest Carbon FAQs document published by the Office of Sustainability and Climate, a good approach to carbon mitigation is to maximize carbon stored in the forest system.

I am grateful for the USFS's engagement with the Tribes in the development of the DEIS. The agency has made meaningful commitments to respect Tribal sovereignty, honor treaty rights, fulfill trust responsibilities, and facilitate co-stewardship. The final plan should advance the Tribal inclusion components independently and not be tied to any of the alternatives (in particular, the Proposed Alternative B and Alternative D). The agency needs to provide a more comprehensive analysis that reflects the breadth and importance of the proposed plan components to Indigenous communities, and more accurately discloses the impacts of the proposed amendment on Tribes.

While the DEIS identified the need to provide a more predictable supply of timber it does not provide sufficient guidance to ensure that the goal of increasing the supply of timber does not conflict with economic opportunities well-known to provide higher economic values, such as outdoor recreation, clean water, and fisheries. These must be addressed in the final EIS.

Thank you for your consideration.