

Data Submitted (UTC 11): 3/14/2025 6:36:34 PM

First name: Allison

Last name: Hamberger

Organization:

Title:

Comments: As a constituent who cares deeply about the preservation of our natural heritage, I am compelled to speak out about the proposed amendments to the Northwest Forest Plan. For the past 30 years, this plan has been instrumental in protecting Oregon's mature and old-growth forests, along with the diverse wildlife that relies on these ecosystems for survival. The plan effectively curbed the rampant clearcutting that once threatened to decimate our forests and drive numerous species to extinction, sparking the infamous timber wars.

However, the U.S. Forest Service is now proposing changes that prioritize and accelerate logging, putting our forests, fish, wildlife, clean water, and climate at significant risk. The Draft Environmental Impact Statement (DEIS) includes Alternative B (the Proposed Alternative) and Alternative D, which would extend the logging threshold from 80-year stands to 120 years in moist forests and 150 years in dry forests. This is unacceptable and contradicts the core objective of the forest plan: to protect endangered and sensitive species such as the Marbled Murrelet, Northern Spotted Owl, and Humboldt's flying squirrel, all of which depend on closed-canopy mature and old-growth forests for their survival. We urge the U.S. Forest Service to maintain the threshold at 80 years.

The DEIS's justification for logging and thinning in mature west-side moist forests, claiming it will reduce fire risk, is flawed. Current scientific evidence refutes this notion. The most effective way to minimize fire risk and enhance climate resiliency is to allow these moist forests to grow and develop canopy closure. Fire management should be focused within the fire danger or "ignition zone" near at-risk communities and other human infrastructure. The best way to protect communities from wildfire threats is to treat fuels in the immediate vicinity of homes, buildings, and other vulnerable structures.

Moreover, none of the alternatives in the DEIS make substantial progress on carbon sequestration; in fact, they backtrack on potential gains. The U.S. Forest Service needs to prioritize Natural Climate Solutions, including longer forest rotations, preserving mature and old-growth trees, and managing for higher forest complexity to maximize carbon sequestration.

I commend the U.S. Forest Service for its engagement with Tribes in developing 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 these Tribal inclusion components independently, not tied to any specific alternatives, particularly Proposed Alternative B and Alternative D.

The agency must also provide a more comprehensive analysis that reflects the significance of the proposed plan components to Indigenous communities and accurately discloses the impacts of the proposed amendment on Tribes. While the DEIS acknowledges the need for a more predictable timber supply, it fails to provide sufficient guidance to ensure that this goal does not conflict with economic opportunities known to offer higher value, such as outdoor recreation, clean water, and fisheries. These issues must be addressed in the final Environmental Impact Statement.