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Comments: The Northwest Forest Plan was created to protect mature old-growth forests and the wildlife that depends on those forests for survival. The Forest Service proposal to amend the plan to prioritize and accelerate logging will put our forests, fish and wildlife, clean water and the earth's ability to mitigate and moderate the effects of climate change at risk.

Alternative B and Alternative D options in the draft EIS would change the age of protected forests from 80 to 120 years in west side wet forests and to 150 years in east side dry forests. These proposed changes would conflict with the foundational objective of the North West Forest Plan to adequately protect endangered and sensitive species. The age threshold needs to be retained at 80 years.

The justification that "logging and thinning in mature west side forests will reduce fire risk" is inaccurate. Current scientific evidence refutes this claim. Fire management is only beneficial near at risk communities and other human infrastructure. The most effective way to reduce the threat of wildfire is to treat fuels in the immediate vicinity of homes, buildings and other vulnerable infrastructure.

All of the alternatives in the DEIS fail to make any real progress on carbon sequestration and, in fact, would only backtrack on what could be gained. The USFS needs to prioritize natural climate solutions like 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. The USFS forest carbon document published by the Office of Sustainability and Climate states that : "a good approach to carbon mitigation is to maximize carbon stored in the forest system."

I am thankful for the USFS's engagement with the tribes in the development of the DEIS. The final plan should advance the tribal inclusion components independently and not be tied to any of the alternatives. 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 disclose the impacts of the proposed amendment on tribes.

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

Sincerely,

Jeff Kahn