

Data Submitted (UTC 11): 3/16/2025 12:52:01 AM

First name: Shannon

Last name: Burstain

Organization:

Title:

Comments: Thank you for your work revising the Northwest Forest Plan and for allowing public input. As a hiker, backpacker, and wildlife enthusiast, I am deeply concerned that the proposed amendments weaken protections for mature and old-growth forests while expanding commercial logging. These forests are invaluable for biodiversity, climate resilience, and future generations, and I urge you to strengthen protections instead of rolling them back.

I urge you to make the following changes to ensure the final plan prioritizes ecological integrity, climate resilience, and Indigenous stewardship:

1. Strengthen Protections for Old-Growth & Mature Forests

Oppose expanded logging in Late-Successional Reserves (LSRs) (FORSTW-LSR-MOI): The proposed changes weaken protections by increasing the allowable logging age from 80 to 120 years. This threatens critical wildlife habitat and carbon storage. Retain the original 80-year threshold and prohibit logging in moist forests over 80 years.

Remove loopholes for logging mature forests before they can age into old growth (FORSTW-MTX-MOI): Shifting from stand age to stand establishment date prevents recruitment of new old-growth forests. This should be eliminated to ensure continued forest maturity and protection.

Tighten salvage logging exemptions (FORSTW-LSR-MOI-STD-02): Salvage logging should not be permitted under the guise of "restoration" unless it directly enhances late-successional habitat.

Recognize the economic value of intact forests: The amendment prioritizes timber profits but does not consider the value of forests for carbon sequestration, recreation, clean air, and water resources that communities depend on.

2. Recognize Forests as Climate Solutions

Prioritize carbon sequestration over commercial logging (ECONSUST-OBJ-01-B): Expanding timber harvests contradicts climate goals and increases carbon emissions. Old-growth forests are irreplaceable carbon sinks and must be protected.

Manage forests for fire resilience rather than timber profits: The amendment prioritizes logging as a wildfire mitigation tool, but research shows that defensible space, prescribed burns, and ecosystem-based management are more effective at reducing wildfire risk.

Oppose Alternative D's hazardous fuel reduction treatments: The plan should focus on controlled burns and Indigenous fire stewardship practices rather than increasing logging.

3. Ensure Meaningful Tribal Collaboration

Support increased Indigenous co-stewardship (TRIBAL-FORSTW-ALL): The expanded role of Tribal stewardship is commendable but should not be used to justify logging under the pretense of "forest restoration."

Fund restoration of culturally significant species: Ensure protections for first foods like beargrass and huckleberry and prioritize Indigenous-led conservation initiatives.

Remove barriers to Tribal land stewardship: The Forest Service should work directly with Tribes to remove legal and bureaucratic barriers preventing effective co-management.

Prioritize ecosystem-based management: The Forest Service should work with Tribes to foster biological diversity, protect ESA-listed species, and restore culturally important plants and animals. Management should be holistic, avoiding monolithic approaches that prioritize a single species at the expense of broader ecosystem health.

4. Strengthen Safeguards Against Loopholes

Clarify logging allowances for "young" forests in Matrix lands (FORSTW-MTX-MOI-GDL): The new definitions could allow logging in stands that are ecologically mature but no longer classified as "old-growth." Stronger protections are needed.

Retain survey and manage protections for endangered species: The amendment weakens protections for key habitat areas and ignores the increased impact on riparian zones, which are critical for salmon, bull trout, and

other wildlife.

Assess cumulative ecological impacts before expanding logging: The amendment downplays the long-term damage that increased timber harvests will have on fragile ecosystems. A more comprehensive analysis is needed before implementation.

5. Strengthen Economic and Workforce Protections

Maintain and expand youth mentorship & fire training (ECONSUST-DC-3, ECONSUST-GOAL-1): The Forest Service should promote educational opportunities in cultural burning, prescribed fire, and wildland fire management, ensuring younger generations can continue stewardship traditions.

Ensure fair pay & safe working conditions for forest workers: Add a new ECONSUST-DC to incentivize equitable wages and safe labor practices for all workers involved in forest management and restoration.

Enhance interagency collaboration for worker protections: Establish an ECONSUST-GOAL to improve communication between land management agencies, the Department of Labor, and OSHA to enforce labor rights, wage protections, and safety standards.

The NWFP should prioritize ecological health over short-term timber industry profits. I urge the Forest Service to strengthen protections for mature and old-growth forests, remove loopholes that enable excessive logging, and shift wildfire mitigation strategies toward community-based solutions.

Thank you for considering my comments. Shannon Burstain