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Organization:

Title:

Comments: I'm writing to comment on the proposed Northwest Forest Plan (NFP) amendment.

The 1994 NWFP has been effective in reversing the decline of mature and old-growth forests in the Pacific Northwest. It has been effective in saving species, preserving our clean water, and storing enormous amounts of carbon dioxide. These productive and beautiful forests are also a recreation draw, helping sustain the economies surrounding them.

It is in the public's interest to maintain and strengthen existing forest protections in the Northwest Forest Plan. Maintaining protection for mature and old-growth forests and stands is essential to our climate protection and to protect habitat for imperiled and endangered species. Mature and old-growth ecologies are one of the most effective and affordable tools we have to mitigate new and drastic weather effects: they sequester enormous amounts of CO₂ from the atmosphere, and are essential to help prevent worse climate catastrophes (such as wildfire) in the future.

I support a modified alternative B (B+) in order to maintain and continue this progress.

The proposed amendment needs improvement to:

- ? better recruit old forests,
- ? maintain healthy dry forests through fire not logging,
- ? maintain the safety of adjacent dwellings using defensible space and thinning trees only near buildings,
- ? improve habitat connectivity,
- ? protect aquatic ecosystems, and
- ? restore old forests in Reserves.

Please amend the proposed action with standards and guidelines that:

- ? Continue to define mature stands by stand age, not establishment year, to promote old-growth recovery.
- Recruit enough trees from the largest and oldest size class to restore old-growth distribution and abundance on

the landscape. Older and larger trees are inordinately important for storing carbon, supporting biological diversity, and resisting stress from fire, drought, and other disturbances.

? Reduce road density to improve wildlife habitat connectivity and reduce aquatic impacts from climate-induced flood events. Reduce road density outside key watersheds and hydrologically decouple roads from water resources in all land allocations.

? Maximize wildland fire and indigenous cultural burning to restore ecologically appropriate fire activity and behavior across drier forest landscapes, and incorporate Indigenous cultural burning practices more broadly. Adopt plan components that support Tribes' co-management and co-stewardship informed by indigenous knowledge, access to cultural and religious sites, restoration of traditional First Foods, indigenous hunting and gathering on national forests, and other issues of interest to Tribes.

? Remove the guideline for artificial creation of young forest in Late-Successional Reserves. Natural disturbances are expected to continue to create suitable amounts of complex early successional forest habitat in Reserves and this guideline is unneeded.

? Reduce the goal for logging our dry forests on the East side. The rush to log 1/3 of our trees in the next 15 years is unsustainable and counter to the ecosystem and habitat goals of the NW Forest Plan. Nor is there evidence it will protect us from runaway wildfires. Large ponderosa pines in particular should be maintained and restored, as they are exceptionally fire-resistant trees.

I live among trees on the side of Bend Oregon that's next to the Deschutes National Forest. Obviously I'm concerned about fire risk. But logging alone doesn't change the weather patterns driving more severe fires - in fact, logging makes it worse. Increasing our mature and old-growth forests is essential to help mitigate the changes behind aberrant wildfires. Don't destroy one of our most potent defenses in the name of saving it!

Thank you for this opportunity to provide comments on the Forest Service's proposed amendment to the Northwest Forest Plan.

Sincerely,

Tamara Stephas

Bend, Oregon