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Comments: Comments on Draft NWFP Amendment

I am a retired biologist who worked on Northern spotted owl and Northwest Forest Plan issues for 15 years for the USDA Forest Service in the Southwest and Northwest Regions and the W.O., and for the Bureau of Land Management's W.O. While I support the need for additional management strategies to reduce the risk of wildfire in the dry forest types, harvesting 100 to 120-year-old trees within the wet forest types will do little to mitigate fire risk in wet forests. The primary explanation provided for timber harvest in an additional 824,000 acres of LSR's that are 80-120 years old, is that they are older now than when the Northwest Forest Plan was signed in 1994. Harvesting this age class will slow down development of mature forests on these acres while doing little to mitigate fire risk, adapt forests to climate change, or improve late successional forest conditions. Removing trees that are 100 to 120 years old will decrease, not increase the development of snags and downed logs as well as decreasing canopy cover needed by several old growth dependent species.

This change seems to be driven more by increasing timber outputs than in expediting development of mature and old growth forest habitat. Removing large, old trees reduces carbon storage in these areas, contributing to the effects of climate change. Restoring habitat for species dependent upon younger structural stages should not be an objective within LSR's. There remains plenty of younger stands from decades of clearcutting harvest that could be managed for these species. I recommend adjusting this strategy to limit harvest to trees less than 100 years old within the wet forest types unless additional justification can be provided. Within the next 30 years, trees that are now 100 to 120 years old will be 130 to 150 years old and approaching mature forest conditions. Harvesting them now will slow down the process of increasing the area of old growth and mature forest that Northern spotted owls, marbled murrelets and red tree voles depend upon.

Thank you for the opportunity to comment on this proposed amendment.

Sincerely,

Christine Jauhola

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