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First name: Ann

Last name: Dorsey

Organization:

Title:

Comments:

As currently written, the best alternative is the No Action one. I urge you to make changes so that the protection of old growth forests is strengthened and tribal management practices are made standard. Neither allowing logging nor fighting active fires with fire to control the spread works and cause even more damage than there would be otherwise. The best way to manage fire regenerative forests is with prescribed fires set in the best conditions for controlling them. Allowing tribes to use their traditional knowledge as to when where and how to set the fires would be ideal.

Please retain all of the tribal inclusion plan components that are in Alternative B, but uncouple them from the forest management components that allow older trees and forests to be logged.

Preserving biodiversity and connected wildlife habitat across the region should be the primary focus of the amendment. This includes not only threatened species, but others that have been impacted by the loss and fragmentation of their habitat, and those awaiting state and/or federal Endangered Species Act listing decisions. Additionally, the wide variety of social and economic benefits National Forests provide for local communities and the region as a whole, such as clean water, climate stability, quality of life, and outdoor recreation need to be emphasized.

Fire resistance and resilience can be enhanced by preserving and restoring mature and old-growth forests. Fuels and fire management should focus on the home ignition zone and on non-commercial treatments and beneficial fire use, not commercial logging. Indigenous cultural burning and wildland fire use should be prioritized.

Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, introduce invasive species, and create hazardous fire conditions. Standards must ensure that fuel reduction is both needed and effective before logging is allowed.

It is especially important that the Northwest Forest Plan includes the following:

1. Strengthen protections for mature and old-growth forests to ensure habitat, water quality, and carbon storage, and recruit more mature and old forests to restore a functional ecosystem.
2. Maintain or expand protections for the network of forest reserves to allow natural processes to flourish, ensure connectivity for wildlife, and support the recovery of imperiled species. Any reduction in forest reserve protections would increase harmful impacts such as habitat destruction, sediment in streams, and carbon loss, further endangering sensitive ecosystems.
3. Genuinely consult with tribes, respect their sovereignty, and provide resources to support their full participation in decision-making. The Forest Service must support co-stewardship agreements, cultural burning practices, first food harvesting, and youth education while ensuring equitable access to planning processes.
4. Address environmental justice by analyzing impacts on air, water, and communities and ensuring fair, sustainable working conditions.
5. Shift wildfire strategies to prioritize community safety and proven prevention measures over logging.

A strong forest plan must incorporate modern science and public values, robust and honest tribal consultation, and the needs of future generations.

Thank you