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Title:

Comments: Official comments for the Northwest Forest Plan Amendment Draft EIS dated November 14, 20024

Forest Service officials,

Having reviewed the proposed EIS, I cannot support the proposed action, Alternative B. The Alternative does not adequately address the stated needs of the proposed Amendment to adapt management strategies to current and future challenges. The house is on fire and the NWFP has not worked. Spotted owls have declined 9% annually, and Alternative B calls for expanded logging.

1) Propose a new alternative that cuts no old growth habitat nor ancient trees, and do not redefine the terms to allow old growth logging. Alternative B redefines "mature" and "old-growth" forests by raising their age class of what qualifies for protection, and weakens protections for trees up to 120 years, and providing broad exceptions for logging in ancient forests. None of your alternative will "Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old-growth ecosystems and supporting regional biodiversity" in a timely manner if at all. With the increased pressure of barred owl predation, habitat loss from wildfire, logging, insects, and disease, no mature habit should be destroyed. In my region, salvage logging from the Holiday Farm Fire took many green trees from the landscape with little supervision. The Rum Creek Salvage Logging Project on Medford BLM post-fire, sped roadside clearcutting along and above riparian areas for headwater tributaries to the Wild & Scenic Rogue. I know the BLM has revised its plans and has removing all of its 2.6 million

acres of Western Oregon forest lands from the NWFP. Still, their actions negatively affect your management successes since they are only maximizing timber production on adjacent lands.

2) Federal fire management has contributed to wildfire severity for 100 years. That coupled with global warming has made most areas in the Northwest Forest Plan region unmanageable for fire protection. Less flammable matures trees should be protected, and only thinning of plantations should be planned until things improve. Alternative B calls for increased logging in dry forests, targeting over 964,000 acres in just 15 years. This proposed aggressive logging in older, fire-resistant forests are likely to increase the frequency and severity of wildfires in the coming decades. I drive by removed ancient ponderosa pines as I drive through the Deschutes National Forest . This area is even more flammable that the westside forests. "Improving wildfire resistance and resilience across the NWFP area and strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change" are goals with your proposal. These two improvements to the NWFP will never be reached with more east-side mature logging:

3) Alternative B also targets mature tree logging in areas like Riparian Reserves. This increases road density and

disruption in areas that need mature trees for stream health and specie recovery for endangered salmon. Bureau of Land Management's Siuslaw field office is planning 25,000 acres of commercial thinning in 30-130 year old Late-Successional Reserves. Do not allow poor practices in riparian areas since the BLM does not. No 130 year old trees should be harvested.

4) Do partner with Indigenous peoples to utilized their knowledge in planning, project design, and implementation to forest management goals to meet the Forest Service's general trust responsibilities. Help them to practice good forest management practices on their tribal lands. Listen to their holistic approach to land management.

5) To provide "a predictable supply of timber and non-timber products and other economic

opportunities on a sustainable level" commercial harvest only on Matrix land and only harvest on other land designations with conservation as the goal. Have flexibility that help you, but is not just an excuse to harvest more. Few mills can cut mature trees, do not harvest trees over 80 years as first mandated by the initial NWFP. Do not make timber harvest a primary goal that eclipses other resources, and does harm that the landscape will not recover from. A more conservative approach is called for since the 1994 NWFP and climate change has put our floral, faunal, and way of life at risk.

Finally, with the present Administration threatening your organization and other agencies you partner with, it might be prudent to postpone this proposal until more stable times. I appreciate your time and consideration. I hope you listen to the public and make a wise decision.

Sincerely,

Peter Saraceno