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Title: Executive Director

Comments: -To: Regional Foresters Jacque

Buchanan and Jennifer Eberlien

Cape Perpetua Collaborative operates in a program area of land sea connection from Yachats to Heceta Head. Our mission is to use the beauty and special nature of this land as a catalyst for locally driven outreach. To be a voice for the Lessons of the Land and Sea and develop an Indelible bond to place; To build generational partnerships, create synergy, generate self-sustaining and leveraged resources; To celebrate the stewardship of the land and sea to educate and inspire long-term thought, and long-term growth.

The Northwest Forest Plan continues to be instrumental in keeping the Pacific Northwest a special place through the restoration of forests and watersheds damaged by irresponsible past logging and road building, recovery of economically and ecologically valuable salmon runs, protection of wildlife habitat and old-growth forests, and ensuring our National Forests are part of a natural climate solution.

I am concerned that the Forest Service's proposed amendment to the Plan weakens protections for our region's forests, clean water, and wildlife habitat. If enacted, these changes would double or even triple logging levels across our public forests, open mature and old-growth trees to chainsaws, and sideline the protections that communities, wildlife, and ecosystems depend on.

I support some elements of the amendment that includes a beneficial fire approach and support of Indigenous cultural burning and co-stewardship agreements. The Forest Service should retain all of the Tribal inclusion plan components that are in Alternative B, but uncouple them from the forest management components that increase the age of trees and forests that can be logged.

Preserving biodiversity and connected wildlife habitat across the region should be a core principle of this forest plan 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.

The amendment should recognize the wide variety of social and economic benefits National Forests provide for local communities and the region as a whole - not just timber, but also clean water, climate stability, quality of life, and outdoor recreation.

Fire resistance and resilience can be bolstered 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 condition. Standards must ensure that fuel reduction is both needed and effective before logging is allowed.

The Forest Service must reject plans to weaken core protections of the Northwest Forest Plan, and do the following:

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.

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.

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. Pairing these components with the Forest Service's plan for weakened environmental protections is a false choice manufactured by the agency.

Address environmental justice by analyzing impacts on air, water, and communities and ensuring fair, sustainable working conditions.

Shift wildfire strategies to prioritize community safety and proven prevention measures over logging.

I believe we need a strong forest plan that incorporates modern science and public values, robust and honest tribal consultation, and the needs of future generations.

Thank you for your consideration. Cape Perpetua Collaborative