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Comments: Thirty years ago, the framers of the Northwest Forest Plan realized that our remaining unlogged forests were worth more standing than as board feet. Since then, science has discovered more about the influence intact forests have, not only on wildlife and soils, but on the water cycle, and yes, even on the weather. The wisdom of leaving our few remaining older stands unlogged, and encouraging younger stands that still retain wild forest characteristics to develop into forest primeval, becomes clearer every year.

Reading over the proposed amendments, there are some timely and appropriate updates, such as heeding input from the tribes, who have long term and intimate knowledge of their homelands, and have been excluded from land use decisions and cultural practices, despite longstanding treaty rights.

Of course, there are still people who can look at a stand of trees that were saplings when Columbus first crossed the ocean, and only see dollar signs. Unfortunately, those people have exerted far too much influence on the proposed Northwest Forest Plan updates.

Alternative A: No change. Protects stands over 80 years old. Stands that were logged by hand before the advent of the chainsaw and clear cut still retain the characteristics of wild forests: complex structure, genetic diversity, often a full component of understory species and related non-vascular flora that support biodiversity and wildlife. Alternative B: Promises tribal inclusion. This is good. Unfortunately, this is a "get out the cut" alternative. It sacrifices our standing forests for the false promise of short-term economic gain. Removing protections for stands 80-120 years old is extremely counterproductive, and against the original intent of the NW Forest Plan. Wood products are important, but plantations are not forests. This country needs to preserve agricultural lands, including working forests, but not at the expense of wild forests. The Plan Amendments talk a lot about rural economies, but there is little mention of recreation and non-logging forest benefits.

Alternative C: The only way to save the Northern Spotted Owl and the Marbled Murrelet, among other imperiled species, is to quit fragmenting the forest. The draft EIS document expresses great impatience about "younger" 80-120 year old stands developing complex structures. However, the road building required to access these stands further fragments the forest, introduces weeds, and exacerbates erosion. While relying on fire rather than mechanical thinning will produce some smoke, the EIS does not account for the air quality impacts of logging and road building, with their attendant dust and diesel fumes.

Alternative D: The most effective way to protect communities and infrastructure from wildfire is immediate defensible space. While dry forests do benefit from controlled burns and thinning in places where fire suppression has allowed excessive fuel build up, there need to be strict protections for older, fire resistant trees. Fire suppression is a bad excuse for cutting down a forest! "Increased fuels treatments within moist and dry forests under Alternatives B and D has the potential to result in both short- and long-term adverse effects to habitat characteristics, such as a reduction in canopy cover and down wood, which could impact plant and wildlife species that utilize these forests." (p. ES-9) Alternative D even does away with rare species surveys. I guess you can't hurt something if you don't even know it's there?

The proposed amendments give a nod toward Tribal inclusion. However, they do this by gutting the heart of the Northwest Forest Plan. Further fragmentation of our intact forests will only exacerbate the effects of our changing climate, increase water shortages, spread weeds, and adversely affect wildlife and recreation. Removing protections for stands under 120 years old removes any chance of old growth recruitment and actual ecological recovery of the PNW region. You can do better!