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Title: Executive Director

Comments: Dear Regional Forester Jacque Buchanan and Regional Forester Jennifer Eberlien,

The Old-Growth Forest Network consists of thousands of people across the US who care about our oldest forests and want them preserved. We are writing to share comments regarding the proposed Northwest Forest Plan Amendment DEIS. The Northwest Forest Plan has been an important and successful creation that demonstrates a landscape scale approach to ecosystem management. The last 30 years of this plan has conserved essential habitat for imperiled species like salmon, northern spotted owls, and marbled murrelets while enhancing drinking water supplies in the region and storing vast amounts of carbon in forests rather than the atmosphere. These benefits are even more essential today with climate and biodiversity crises.

We support the adoption of Tribal involvement and Traditional Ecological Knowledge in the proposed amendments to this plan. The Northwest Forest Plan should support Tribal access to harvest foods, accommodate cultural burning practices, and support co-stewardship agreements.

Amendments to the Northwest Forest Plan must retain if not expand the network of forest reserves where natural processes are allowed to flourish and lead. In doing so, essential habitats of imperiled species that depend on mature and old-growth forests, as well as cool, clean streams, will be allowed to further survive and recover.

Prohibiting logging from these forest reserves is an essential step in achieving these goals. Unfortunately none of the actions described in the Draft EIS reflect an increase in these reserve areas that offer the most carbon storage and habitat protection. The offered action alternatives instead open the door for increased logging within a smaller footprint of land compared to that in the original Northwest Forest Plan, since the Bureau of Land Management has removed all of its 2.6 million acres of Western Oregon forest lands from the protective management scheme. Many practices and alternatives that come along with commercial logging, such as road-building, sedimentation of streams, loss of carbon storage, and degradation of habitat of sensitive species that depend on old forests, will impede the original conservation directives and goals of the first Northwest Forest Plan. The action alternative proposals would also permanently lock existing mature forest stands out of potential protection, which in turn would severely limit recruitment of old-growth to replace what will naturally be lost to disturbance over time.

We strongly oppose weakening critical environmental protections. Mature and old-growth trees and stands are naturally fire-resistant and fire-resilient and these resilient factors should be prioritized when managing forests for wildfire risk. The Forest Service must not sacrifice the immediate and near-term biodiversity values and the natural climate solution our older forests provide in exchange for a return to older forest logging and uncertain ecological benefits that may never accrue. This region is one of the richest in terms of carbon storage across our country's forests and the plan should forefront those benefits.

In conclusion, we strongly oppose efforts that would significantly expand commercial logging in mature and old-growth forests in the Pacific Northwest. While we support advancements of the plan to include consultation, co-stewardship, and engagement with Tribal communities, the amendments should commit to protecting and increasing the amount of mature and old-growth across the plan footprint, helping restore what was very rapidly lost prior to the Northwest Forest Plan.

For the Forests,

Sarah Adloo, Ph.D.

Executive Director

Old-Growth Forest Network