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Comments: Overall, NWFP Alternatives B, C and D are proposals to dramatically increase the logging of mature stands of forest, both moist and dry, and does not offer species-specific plan components to ensure ESA-listed species' recovery or other native species' viability throughout the planning area. This is counter to the original NWFP intention, which was to recover more older moist forest habitat. These mature forests (80+ years old) have been a lifeline for imperiled fish and wildlife, have safeguarded clean water, and provided an enormous unforeseen benefit for the climate by pulling vast amounts of carbon dioxide from the atmosphere and safely storing it in their trunks, roots and forest soils.

Changing the definition of mature moist forest stands from 80+ years old to 120 years old opens up to logging many thousands of acres of previously protected forests. The proposed shift in stand age considerations means that the 80+ years old will likely never age into protection.

In dry forests, NWFP Alternatives B, C and D proposed that trees older than 150 years will receive nominal protection from logging, but the new proposed changes include broad exceptions for "restoration" and "to reduce wildfire risk."

The tribal inclusion components, if meaningfully implemented in proper consultation with Tribes, warrant consideration and potential adoption separate from the proposed conservation rollbacks and increased commercial logging.

So I oppose NWFP Alternatives B, C and D, as they can dramatically increase logging in both wet and dry forests, which reduces benefits for fish and wildlife and reduces climate benefits of sequestering carbon dioxide and reduces protections for ESA-listed species. There are more ways to make money from forests than logging, such as the growing interest in recreation opportunities.