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Comments: The science surrounding commercial logging does not support the practice that removal of overstory, clearcutting and construction of new roads in America's National Forests are effective means of controlling or preventing wildfire. As all three versions (B,C and D) of the proposed amendment do not address those facts, it appears that the primary objective of B, C and D are mainly focused on increasing access to all areas of the matrix for the benefit of commercial logging corporations.

If there is to be any change in the current Northwest Forest Plan, Alternative C is by far the best choice. However, the following issues need to be addressed:

1. There must be no further logging of mature and old-growth forests and any area deemed an LSR. These areas are vitally important to carbon sequestration during the worsening climate crisis and vitally important as habitat for a variety of plant and animal species during this period of worldwide mass extinctions. In matrix areas, the proposal uses forest establishment dates rather than stand age for forest protection. This severely limits recruitment of old-growth to replace what will be lost to disturbance and logging over time. This is absolutely the wrong direction if recovering endangered species and sequestering carbon are to continue as major objectives in America's National Forests.

2. Expanding active management, which Alternatives B, C and D advocate, prioritizes logging to address the threat of wildfire over proven community protection efforts such as defensible space and emergency planning. Given limited (and possibly diminished) resources, focusing on expanding discretion to log is a mistake. Prescribed fire and cultural burning have been helpful restoration/acute wildfire prevention practices. Prioritizing the retention of mature and old-growth trees is key to both the ecological integrity of LSR and old-growth areas and further impediments to acute wildfires.

3. The recommendations in the amendment for working with and incorporating knowledge from Tribes and Tribal communities are laudable. It is necessary, however, to separate these recommendations from the increase in harvest levels and reductions in old forest protections. Addressing the historical marginalization of Indigenous communities in federal land management decisions is critical. Ensuring that these communities are not disproportionately impacted by industrial logging must be part of any acceptable amendment. The amendment is unclear about what steps will be taken to build relationships with Tribal leaders and communities particularly in support of cultural/prescriptive burning and Indigenous stewardship practices.

4. DEIS Vol I page 3-26 indicates that 824,000 acres of LSR will be newly opened to logging in the Plan area. Promoting the idea that logging is "to enhance the development of mature and OG forest characteristics" overlooks the results of moist forest logging in the Siuslaw National Forest. New understandings of dry season Vapor Pressure Deficit cast doubt on the wisdom of thinning for old growth characteristics. Further, thinned plantations rapidly grow brushy forest floors which compete with understory conifer growth. There does not appear to be likely funding for planting understory conifers nor treating brushy forest floor growth.

5. The Siuslaw National Forest (and other coastal forests) is naturally fire resistant. A USGS-Oregon State University project recently mapped fire-resistant forests to identify "fire refugia." The url for the project is: <https://firerefugia-app.forestry.oregonstate.edu/projects/v3>

It is noteworthy that the DEIS only mentions the word "refugia" three times, and is not mentioned at all in relation to fire. There is definitely a difference in wildfire likelihood between Cascade (and Sierra) dry forests and coastal

moist forests. The two types of forests (moist/dry) should not be managed the same. For example: coastal forests are resistant to lightening caused wildfires and generally do not need wildfire prevention remedies.

6. The DEIS appears to not generally use the notion of "permanent fuel breaks" in moist forests. However, the Siuslaw management is discussing permanent fuel breaks along major forest roads there. Either this must be eliminated or the Record of Decision must provide science-based research for justifying such fuel breaks in moist forests.

7. DEIS Vol I page 3-70 states: "In addition to the management activities discussed above for moist forests and dry forests, Alternative B and D would add objectives for increasing the acreage of fuels treatment (e.g., mechanical treatments, wildland prescribed fires) within moist and dry forests in all LUAs..." This statement is in conflict with existing science on the needs of preventing wildfire in moist forests. Indeed, even the concept of fuels in moist forests (which often have significantly deep duff storing rainy season moisture under an intact forest overstory makes the idea of "fuel" in moist forests irrelevant.

8. The DEIS does not address the drying impact of forest thinning. As wildfire science indicates that forest stand conditions are a major factor in wildfire risk, thinning in moist forests is counterproductive to preventing wildfires. And thinning in dry forests still contributes to a further drying in those forests. Agency management itself is the greatest contributor to wildfire risk in federal forests.

9. The DEIS is focused on expanding active management for timber production. Opening 824,000 acres of LSR to commercial logging is meant to reach a billion+ board feet of timber production. This shift in forest management will work against any mitigation of climate warming and the drying of the Pacific Northwest's federal public forests. It will not effectively reduce wildfire risk, but rather increase it. The DEIS needs to provide the metrics for carbon loss due to increased forest harvests. The Olympic National Forest and Siuslaw NF are the two highest saving carbon sinks of the 154 national forests. These facts are not addressed by the DEIS. They need to be. These two national forests in particular should be left alone.