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Comments: The revised Forest Plan must contain strong, enforceable standards with measurable objectives that protect mature and old forests, streams and water quality, wildlife, connectivity, unroaded areas, and carbon storage.

keep- and strengthen the protective standards in the existing Forest Plans. Unfortunately, in the Forest Service's new Forest Plan revision, the agency has rolled back or entirely done away with most of the standards in the old Forest Plans- even though the agency has admitted that these standards have been essential for protecting forest ecosystems for the past 30 years.
Very few standards are included in the Forest Service's current draft plan. Rather, the Forest Service is relying heavily on voluntary, subjective, and largely unenforceable guidelines in the new proposal. The lack of standards gives the Forest Service broad discretion for logging and other actions, as long as they claim they are generally moving towards very subjective "desired conditions" overall.
We are in the early stages of the Forest Plan revision process, so there is still time for the agency to analyze and adopt strong, clear, and enforceable standards.
WILDLIFE NEED MORE PROTECTION, NOT LESS

Prioritize protections for wildlife and wildlife habitats, large habitat blocks, and landscape-level connectivity. The Blue Mountains contain unique and irreplaceable habitat for numerous imperiled species such as wolverine, lynx, wolves, moose, and more. Strengthen existing standards for connectivity between blocks of mature and old forests- NOT weaken or eliminate them.

The Blue Mountains encompass connectivity corridors of regional importance, connecting the Rocky Mountains and the Eastern Oregon Cascades. This corridor is crucial for allowing species to move across the landscape and adapt to climate change. In order to give species the best chance at adapting to and surviving climate change, it is vital that we protect core habitat blocks, unroaded landscapes, and forest and stream connectivity for all native flora and fauna.
include an alternative that analyzes the system of forest reserves proposed for the Blue Mountains by several prominent scientists in the peer-reviewed paper by Law et al. in 2022 Strategic Reserves in Oregon's Forests for water, biodiversity, and carbon to mitigate and adapt to climate change. We are asking that the Forest Service analyze this proposal for strategic reserves in a preferred alternative in the Forest Plan Revision.

PROTECT LARGE TREES AND MATURE AND OLD FORESTS

Protect large trees and mature and old forests. Keep and strengthen the protective standards for large trees that have been in place for the past 30 years. Despite the clear benefits of large trees for fire resistance, wildlife habitat, providing clean water, and carbon storage- the Forest Service is severely weakening protections for large trees in their new Forest Plan revision. They are proposing to roll back the clear, enforceable standards that have protected large trees since 1996.

Large trees provide key wildlife habitat for many species. For example, dozens of birds rely specifically on large trees and snags (standing dead trees) for nesting, shelter from predators and harsh weather, foraging, and more. In recent years, numerous studies have raised alarms regarding habitat loss, climate change, and decline of fauna and biodiversity across the planet. Warnings have been sounded by scientists regarding the declining bird populations we are seeing and projections of far greater losses to come. For example, a large-scale study in 2019 reported a "staggering decline of bird populations, and found "wide-spread population declines of birds over

the past half-century, resulting in the cumulative loss of billions of breeding individuals across a wide range of species and habitats. They show that declines are not restricted to rare and threatened species-those once considered common and wide-spread are also diminished. These results have major implications for ecosystem integrity, the conservation of wildlife more broadly, and policies associated with the protection of birds and native ecosystems on which they depend."

Given the urgent need to address the biodiversity and climate crises, the Forest Service needs to focus on protecting wildlife and habitat, clean water, and ecosystem integrity.

Large trees are also essential for ensuring forests can filter and store clean, cold water for drinking water, fish, and wildlife. As downed logs in streams, they provide habitat for salmon, amphibians, and other aquatic species. They provide for and protect groundwater and capture sediment, and their deep roots help forests resist drought. Big trees help protect water movement and storage across entire watersheds, helping to control the timing and magnitude of stream flows, lessen floods, and more.

While the Forest Service has consistently used loopholes to skirt the existing protections for large trees (called the "Eastside Screens"), these standards have nevertheless been crucial for protecting many large and old trees in recent decades. The standards were put in place in eastside forests due to a century of over-logging and mismanagement, which resulted in a severe deficit of large trees compared to historic norms. Let's not repeat the mistakes of the past.

One of the justifications the agency uses for rolling back protections for large trees is that large Grand fir trees threaten large and old Ponderosa pines due to competition and fire susceptibility. However, in the push to log large and more profitable trees, the agency is ignoring key facts:

Grand fir are not a "threat" to Ponderosa pines. Recent research found that large ponderosa pine and grand fir were found together on only 8% of over 3,300 plots (Mildrexler et al. 2023).

Large trees make up only 3% of trees in the Blue Mountains and Eastern Oregon Cascades (Mildrexler et al. 2020). We can't afford to lose any more large trees to logging.

Large and old Grand fir trees provide crucial wildlife habitat, yet they are at documented deficits compared to historic norms. The relatively soft wood of grand fir trees creates ideal wildlife habitat by providing natural hollows, cavities, and unusual growth forms that wildlife use for shelter, nesting, and foraging (Henjum 1994, Wisdom et al. 2000). They are important to the biodiversity of many eastside forests, providing habitat for species such as American marten, Canada lynx, Rocky Mountain elk, flying squirrel, Vaux's Swift, American Goshawk, Pacific tree frog and many others (Thomas 1979; Wisdom 2000)

Large trees, including large Grand fir trees, are fire resistant. The thick bark and height of large and old Grand fir provide natural resistance to fire. In a grand fir forest, wildfire severity is relatively low and second only to ponderosa pine forests in fire resistant traits (Moris et al. 2022). The canopy of Grand fir trees offer several additional benefits: canopy trees help create cool, moist conditions that help moderate fire behavior (Hakkenberg et al. 2024); The canopy shade helps suppress growth of hazardous surface and ladder fuels (Zhou et al. 2013); and the canopy helps reduce penetration of warm dry air into the forest that can increase evaporative demand and increase the drought stress that trees are exposed to (Jarecke et al. 2023, Watts et al. 2024).

Logging implementation needs more accountability, transparency, and environmental safeguards, not less! The new Forest Plan revision goes in the wrong direction for protecting the few remaining legacy trees we have on the landscape. In addition to rolling back the standards for large trees, the Forest Service is also making it easier to log big and old trees during timber sale implementation.

Large and old trees are regularly cut down and sold in order to build roads or skid trails, install cable logging corridors and landings, and because they are deemed "hazards". This includes cutting down countless legacy old growth Ponderosa pines- the very trees Forest Service claims it is "restoring" through logging. In a single timber sale, hundreds of large and old trees may be cut down and sold at the mill, despite not being accounted for or disclosed in the environmental analyses for the timber sale.

We need to close these loopholes for logging big and old trees, not make it easier. Eliminate loopholes for cutting down mature and old trees including during logging implementation.

Do away with loopholes, such as "site-specific amendments" that circumvent Forest Plan protections. The

proposed Forest Plan would allow the agency to exempt individual timber sales and other projects from the agency's own Forest Plan rules- with no limit on the number or size of projects that can opt out of the agency's own Forest Plan rules.

STREAMS AND FISH ARE SLATED TO LOSE PROTECTIONS

Strong, enforceable standards are needed to protect streams, fish, and water quality. A central component of any Forest Plan Revision for the Blue Mountains must include safeguards for fish and other aquatic and riparian species that depend on a sufficient quantity of clean, cold water in streams, rivers, tributaries, and wetlands.

Unfortunately, the Forest Service is proposing to eliminate the strong, quantitative standards that have protected streams and water quality for the past 30 years.

Preserve and strengthen "Riparian Management Objectives" standards from the existing Forest Plans. These standards are based on the biological needs of fish, aquatic organisms, and stream ecosystems. Without these standards, imperiled fish such as Bull trout, Columbia River steelhead, and Chinook salmon- which are already suffering from the effects of climate change and habitat loss- will be further pushed towards extinction.

Preserve and strengthen the standards for no-cut buffers adjacent to streams. The agency needs to stop using loopholes to log streamside riparian forests. Instead, they should keep the current buffers in the old Forest Plans, and strengthen them to better protect sensitive riparian forests from logging and roading.

Approximately 75% of eastside terrestrial species depend upon riparian habitats for their life cycle needs or use these habitats more than others (Henjum et al. 1994). Riparian and aquatic ecosystems are heavily reliant on large tree structure (including large living trees, large trees with cavities, large snags, large downed wood, and large woody debris in streams). Aquatic ecosystem integrity is intertwined with mature and old forests-and includes large and old trees, not just old trees.

Protecting forests is crucial for protecting drinking water. Forested streams are part of complex and intricate ecosystems- ecosystems that need protection in order to continue to supply clean, cold water for humans and other species. A recent Forest Service study found that approximately 90% of people in the West are served by public drinking water systems that rely on water from national forests and grasslands. The study also noted that "a century of research has demonstrated unequivocally that forested lands provide the cleanest and most stable water supply compared to other land types"

Streams and rivers in eastern Oregon also support important native trout and salmon populations, as well as world class fishing.

LOGGING IS A FALSE SOLUTION TO COMMUNITY SAFETY AND FIRE

We need more environmental protections to keep communities safe- NOT more logging. Unfortunately, the draft Forest Plan proposes to greatly increase logging under the guise of "hazardous fuel mitigation".

Logging in the backcountry will not make communities safer. Working near communities, home hardening, and emergency preparedness are far more effective strategies for keeping homes and communities safe.

The primary threat to homes is from grassfires, not forest fires. Most homes that burned in the US in recent years were destroyed by grass and shrub fire, not forest fires.

Most homes are burned by large, fast moving fires. Fast-moving wildfires comprise less than 3% of all U.S. fire events- but they account for 89% of all structures damaged or destroyed.

Large, fast-moving wildfires are primarily driven by climate. These fires are primarily driven by drought, heat, and wind- not by "fuels".

The majority of fire ignitions that cross jurisdictional boundaries start on private lands, not public lands.

Protecting forests from logging does not increase their fire risk. Protected forests do not burn more severely or with greater frequency compared to logged forests.

Logging increases carbon emissions compared to unlogged forests, and compared to wildfire. Let forests be part of the climate solution by letting them grow.

Please see our "Logging is a False Solution to Wildfire and Community Safety" page for citations and more detailed information on fire and logging.

JUST SAY NO TO POST-FIRE LOGGING AND "SALVAGE" LOGGING

Burned forests provide vital and delicate wildlife habitat that is essential for many species and is rare compared to historic norms. These rare "snag forests" should be left to their own natural recovery processes.

Unfortunately, the proposed Forest Plan revision encourages post-fire logging, and includes use of "salvage" logging to "recover the economic value of dead and dying trees following disturbance events."

In an Open Letter to Members of Congress from 250 Scientists Concerned about Post-fire Logging (2013), scientists state that "Post-fire habitats created by fire, including patches of severe fire, are ecological treasures rather than ecological catastrophes, and that post-fire logging does far more harm than good to the nation's public lands."

Dr. Richard Hutto, in his study Towards Meaningful Snag-Management Guidelines for Postfire Salvage Logging in North American Conifer Forests (2006) goes so far as to state: "I am hard pressed to find any other example in wildlife biology where the effect of a particular land-use activity is as close to 100% negative as the typical postfire salvage-logging operation tends to be."

The wealth of scientific studies done on post-fire logging have come to an overwhelming consensus that post-fire logging has extremely negative impacts on numerous species, sensitive ecosystems, snags and downed wood (both very important for wildlife habitats), water quality, and forest regeneration.

The proposed Forest Plan revision would exempt "salvage" logging from protective snag retention and recruitment guidelines.

Snags (standing dead trees) provide essential wildlife habitat, with many species relying on them for nesting, foraging, and shelter from weather and predators. Unfortunately, forests that have been previously logged usually do not have an adequate number of snags, especially large snags, to meet the needs of many species that rely on them.

Tell the Forest Service that "salvage" logging is a destructive practice that has no ecological value and no place on public lands, and that snags- especially large snags, clusters of snags, and those providing high-quality wildlife habitat- should be protected from all forms of logging.

WE NEED MORE WILDERNESS

We need more Wilderness to help preserve mature and old forests, clean water, and biodiversity. All undeveloped roadless areas that satisfy the definition of Wilderness found in the Wilderness Act must be evaluated and considered for recommendation as potential Wilderness areas during forest plan revisions.

The Forest Service does not recommend any areas for Wilderness designation in the proposed Forest Plan Revision, despite many areas being in need of protection and qualifying as Wilderness. Forests designated as Wilderness have the strongest protections compared to other designations- though activities such as livestock grazing and hunting are still allowed in most Wilderness areas.

Currently, only 4% of Oregon's lands (approximately 2.5 million acres) are currently designated as Wilderness. This is a substantially smaller percentage than neighboring states such as Washington (10%), California (15%), and Idaho (10%). Wilderness areas occupy approximately 17.1 percent of the combined area of the Malheur and Wallowa Whitman National Forests.

In 2010, the Forest Service conducted a Wilderness Needs Evaluation for the Malheur, Umatilla, and Wallowa-Whitman National Forests. Through this process, 76 potential wilderness areas were identified within the Blue Mountains National Forests. These areas cover 705,310 acres, or 13 percent, of National Forest lands in these forests.

Watersheds with logging, roads, and livestock grazing have worse stream habitat conditions compared to unroaded areas. A 5-year review of Snake River Salmonids by the National Oceanic and Atmospheric Association noted that "…unmanaged or reference reaches (streams in watersheds with little or no impact from road building grazing, timber harvest, and mining) on Federal lands in the Interior Columbia basin (including the

Snake River basin) are in better condition than managed streams. In particular, managed watersheds with high road densities or livestock grazing tend to have stream reaches with worse habitat conditions than streams in reference watersheds. When roads and grazing both occur in the same watershed, the presence of grazing has an additional significant negative effect on the relationship between road density and the condition of stream habitat…." (NOAA 5-Year Review of Snake River Salmonids 2011)

WOLVES AND LARGE CARNIVORES

Stop killing large carnivores and other native wildlife on public lands, and provide the strongest possible standards to protect them.

The Blue Mountains encompass unique and important connectivity corridors and wildlife habitats that support species such as wolves, moose, wolverine, and more. These animals require and deserve protection and places to roam and exist. Wolves, large carnivores, and other native species evolved with and are integral to the ecosystems in which they evolved. For example, recent research has shown that wolf reintroduction in Yellowstone has allowed aspen trees to recover, and supported increased biodiversity and habitat diversity. Native wildlife, including large carnivores, should not be killed on public land in order to favor private interests in cattle or other domesticated livestock on National Forests in the Blue Mountains. Unfortunately, federal agencies continue to use taxpayer dollars to mount a systemic campaign to kill huge numbers of large carnivores and other native animals, including on public lands.

From 2020 to 2024, Oregon Department of Fish and Wildlife killed 41 wolves, and 6 were shot by ranchers. Another 34 have been illegally poached by poisoning or shooting. Wolf and livestock conflicts continue to exist on federal public lands- particularly in eastside forests where livestock grazing is ubiquitous on National Forests and cattle and sheep are left unattended in remote forests. You can read more about the recent increases in poisoning of wolves in this news article.

In 2024 alone, the federal agency named "Wildlife Services" killed 8,353 native animals in Oregon, including intentional killing of 197 beavers, 196 bears, 2,166 coyotes, 108 cougars, 20 bobcats, 111 foxes, 93 badgers. Hundreds of burrows and dens were also removed, killing an unknown number of young. Methods for killing include neck snares, leg and body traps, shooting, baiting and dogs, and other inhumane methods. The number of animals killed in 2024 are similar to those in other recent years.

Across the US in 20024, Wildlife Services reported killing 391,091 native animals- including the intentional killing of 2,020 foxes (red and grey foxes, kits, and an arctic fox), 368 bobcats, 57,884 coyotes, 317 wolves, 232 mountain lions, 345 black bears and 6 grizzly bears, 258 badgers, 23,691 beaver, and thousands of other animals. Hundreds of dens and burrows were additionally removed, with an unknown number of pups, kits, and other young killed.

You can see the report on Wildlife Service's webpage (under the "pdr G" dropdown), or in the spreadsheet we created from the report here. In 2023, similar numbers of animals were killed (you can see Project Coyote's summary here).

Widespread poaching poses a widespread threat to large carnivores and other animals. Research suggests that state-authorized killing of wolves may decrease social acceptance of wolves. Outcomes such as horrific torture of wolves- such as the recent indicident in Wyoming where a wolf was run down with a snowmobile, tortured, and shown off at a bar- may be more likely to occur when the lives of wild animals are devalued and "lethal control" is the norm- particularly when National Forests and other places that should be providing habitat and refuge are instead viewed primarily as providing places for livestock to roam and forage.

Research has also shown that authorized killing of wolves and cougars can, in many cases, increase the number of depredations on cattle. You can see Dr. Wielgus talking about his research on wolves here and on cougars here. Additionally, you can see his talk and other experts discussing their wolf-focused work and research here. Given the widespread killing and poaching of wildlife across the nation and in our region, it is all the more important that National Forests should be a place of refuge for wildlife, where strong protections for species and their habitats are prioritized.

ROADS… SO MANY ROADS

Analysis and planning for the bloated roads system on these National Forests must be conducted before or as part of the Blue Mountains Forest Plan Revision process. The agency cannot adequately assess the effects of Forest Planning while ignoring the ubiquitous and widespread impacts of roads across the landscape. The Forest Service must conduct Travel Planning in order to have an accurate and relevant analysis of baseline and future conditions across the landscape.

The Malheur and Wallowa-Whitman National Forests currently have existing road densities at levels that are recognized as threats to water quality, fish, and watershed health. Fish passage barriers from roads also block thousands of miles of fish habitat, and are an enormous problem for fish across the region.
National Forests in the Blue Mountains continue to exceed Forest Plan standards for road density in many watersheds, including those designated for prioritizing the protection of water quality and fish.
The Wallowa-Whitman National Forest has 9,119 miles of existing roads, and the Malheur has 9,670 miles. One could drive from the northwestern tip of Washington state to the farthest northeastern tip of Maine, down to Miami, Florida, over to San Diego, California, and back up to the northwestern tip of Washington state, and still not have traveled as many road miles as are contained within either of these National Forests.
The existing average road density on the Malheur National Forest is 3.56 miles per square mile. The average open road density across the forest is 2.56 miles per square mile. If Wilderness and Roadless areas are excluded, then the average existing road density is 4.23 miles per square mile and the open road density is 3.05 miles per square mile.
Wilderness and Roadless areas occupy a small percentage of these forests, and the excessive road density outside of these areas has serious and ongoing negative ecological consequences for the majority of watersheds on these forests. Wilderness areas, for example, occupy approximately 17.1 percent of the combined area of the Malheur and Wallowa Whitman National Forests, and only four percent of Oregon's total land area.
Despite the extremely high road densities on National Forests in the Blue Mountains, the Forest Service has stated that travel management planning will not be part of the revised Land Management Plans- even though the Malheur and Wallowa-Whitman National Forests are among only a handful of National Forests across the nation that have not conducted Travel Planning, as mandated by the 2005 Travel Planning Rule.
Across Oregon and Washington, the USFS manages approximately 90,000 miles of roads. The agency notes that it is "a challenge to maintain all roads to proper safety and environmental standards due to increased use, aging infrastructure, and decreasing budgets. Many roads, built between 1950 and 1990, have exceeded their designated lifespan and require costly repairs. Unmaintained roads and infrastructure can impact water quality and wildlife habitat, especially fish-bearing streams. Backlog maintenance projects top $1.2 billion, and funds available for road maintenance are only about 15% of what is needed to fully maintain the current road system.
The USFS notes that "of the 90,000 miles of Forest Service roads in Oregon and Washington, about 2/3 of those are currently open and maintained for both public and administrative uses." The USFS estimates that approximately 12% of the overall road network is "likely not needed", with many of these unneeded roads already being "closed or stored", and only about 20% or 2,000 miles being currently open to the public.
The bloated and sprawling road systems on National Forest lands are fiscally burdensome as well as ecologically harmful. In discussing budget shortfalls, the Forest Service notes, for example, that on the Wallowa-Whitman National Forest, it would take approximately $64 million dollars to bring the entire road system back up to standard, and approximately $6.8 million dollars to keep it that way.
Please see our "Roads are a Widespread Threat to Streams, Water Quality, and Wildlife" page for citations and more detailed information on fire and logging.

ADDRESS WIDESPREAD DAMAGE FROM LIVESTOCK GRAZING

Stricter standards are needed to protect aquatic ecosystems and sensitive habitats from livestock grazing.

Livestock grazing is ubiquitous in the Blue Mountains, and continues to cause well-documented harm to aquatic ecosystems and other sensitive areas. Blue Mountains Biodiversity Project's field survey data clearly shows

widespread and extensive damage to streams and riparian forests due to livestock grazing.
Include an alternative in the Forest Plan Revision that reduces livestock grazing. Such an alternative should consider reducing permitted livestock use in the planning area by approximately 25-40 percent from current authorized levels, based on site capability and ecological conditions. Current ecological conditions should inform where reductions, or resting of allotments, should be prioritized. All vacant and closed grazing allotments should maintain their current status. Grazing permit buyouts should be allowed. Reductions could be achieved through a combination of decreased permitted Animal Unit Months, shortened grazing seasons, and removal of livestock from the most ecologically sensitive areas.
Cattle should be excluded from all fish-bearing streams that support species listed as Threatened or Endangered under the Endangered Species Act (ESA).
Water quality protections should be written to prohibit any grazing practices that cause measurable increases in turbidity or sediment beyond state water quality standards.
Effective, measurable use standards for livestock grazing that establish clear, quantitative thresholds tied directly to ecological conditions must be included and emphasized.
Examples include: for riparian and streambank protection, the Forest Plan Revision should cap streambank alteration by livestock to not exceed 10 percent of bank length within any pasture during the grazing season, that livestock may not remove more than 30 percent of woody riparian browse leaders on current-year growth, and that livestock must be removed when stubble height of hydric sedges or other key riparian species declines below an average of six inches across a reach.
Soils should also be protected through the use of clear, quantitative, and mandatory standards. Soil protection can also be expressed through limits on disturbance, such as prohibiting livestock-caused trampling and pugging on more than 15 percent of ground surface in key areas, or requiring that at least 85 percent effective ground cover be maintained on erosive soils.
Standards should also ensure compliance with the Planning Rule's requirement to sustain diversity and viability of native species.
Adaptive, trigger-based standards make management responsive to conditions on the ground, for example, requiring that livestock be moved within five days if residual vegetation in key riparian areas falls below six inches, or mandating stocking rate reductions the following year if utilization exceeds 30 percent in two consecutive years.

LET FORESTS BE PART OF THE CLIMATE SOLUTION

Prioritize protecting ecosystem resilience to climate change. The Forest Plan Revision must include the strongest possible protections in order to give species and ecosystems the best chances at adapting to and surviving climate change.

Scientists and experts have issued dire warnings that climate change and habitat loss are threatening approximately one million species across the globe, and causing unprecedented threats to the survival of the ecosystems that support life on our planet. Scientists warn that immediate, and comprehensive actions are required in order to stay below 2°C.
Climate-related impacts are already hitting close to home in Oregon, and are projected to become more extreme. This includes extensive habitat loss and risk of extinction for Bull trout, steelhead, salmon, and other species. For example, Bull trout may lose over 90% of their habitat within the next 50 years due to increased stream temperatures as a result of climate change. Bull trout require very cold headwater streams for spawning, and so are likely to be disproportionately affected by stream temperature increases due to climate change (ISAB 2007).
Tell the Forest Service to protect forests in the Blue Mountains from climate change by preserving mature and old forests, large trees, unroaded habitat blocks, and terrestrial and aquatic connectivity- and by prioritizing protections for carbon storage and biodiversity.
Old forests store more carbon compared to young, logged forests (Law et al. 2001, Law et al. 2003). The timber industry is the greatest source of greenhouse gas emissions in the state of Oregon. (Law et al. 2018).
Scientists have identified forests in Oregon that have the greatest potential to store carbon and are least

vulnerable to disturbance and climate change. Those same forests also showed huge potential to support biodiversity (Law et al. 2018, Buotte et al. 2019, Mildrexler et al. 2023). The Forest Service should be protecting these forests, not logging them.

Large trees in the Blue Mountains and Eastern Oregon Cascades store disproportionate amounts of carbon. Despite comprising only 3% of trees in the Blues, large trees store approximately 42% of the above ground carbon in these forests. Large Grand fir trees comprise over a third of the above ground storage in large trees (Mildrexler et al. 2020).

You can watch Dr. Beverly Law, a globally renowned climate scientist, discussing her forest and climate research here. You can also read a summary of her background and primary research findings here.

A PARADIGM SHIFT IS URGENTLY NEEDED

A paradigm shift is needed in order to protect forests in the Blue Mountains and across the region. We are in the midst of the intertwined climate and biodiversity emergencies. It is time to take decisive actions to ensure that our forests are allowed to be a vital part of the solution to these crises. We urgently need a new model that prioritizes mature and old forests, wildlife and core habitats, landscape level connectivity, streams and clean water, soils, and carbon storage. We need to focus on protecting biodiversity and ecological integrity.