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Comments: We live in truly terrible times for forests.

Backwards 'science' on how to protect communities and forests from severe wildfire....a federal administration which cares only for \$\$ and sees natural places not as treasures but as resources to be exploited....an established Forest Service staffed by smart folk but who've been schooled that resource extraction is primary, homes for all the rest of the wild creatures on earth: secondary at best.

This list is long.

In the midst of this devastating new paradigm of even worse extraction practices than we ever dreamed possible, we have an opportunity to do something right.

Please listen up:

The revised Forest Plan MUST contain strong, enforceable standards with measurable objectives which protect mature and old forests, streams and water quality, wildlife, connectivity, roadless areas, and a serious focus on carbon storage. The clownish administration may treat to push an agenda that there's no such thing as 'climate change'....but we all know that's a charade. WE MUST STOP PRETENDING THAT FORESTS ARE NOT THE MOST IMPORTANT NATURAL FEATURE FOR MITIGATING THE CO2 IN OUR ATMOSPHERE. They harm rather than help, if we mow them down.

Please...we must 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-DESPITE THE FACT you've admitted these standards have been ESSENTIAL for protecting forest ecosystems for the past 30 years.

Precious few standards are included in the current draft plan. Rather, the FS is relying heavily on voluntary, subjective, and largely unenforceable guidelines in the new proposal.

THIS IS UNACCEPTABLE.

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.

This is death to the forests....you know it, we know it.

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.

WE MUST:

*Prioritize protections for wildlife and wildlife habitats, large habitat blocks, and landscape-level connectivity.

*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.

*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 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).

THIS IS THE KIND OF SCIENCE WHICH ACTUALLY PREVENTS AND MITIGATES SEVERE FIRE.

Use real science to make these decisions, not timber industry euphemisms and lies. A paradigm shift is needed in order to protect forests in the Blue Mountains and across the region.

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.

ON YOUR WATCH WE HAVE LOST THE VAST MAJORITY OF OUR OLD FORESTS.

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.

What can you be thinking...other than money??

We need more environmental protections to keep communities safe- NOT more logging.

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. A paradigm shift is needed in order to protect forests in the Blue Mountains and across the region.

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 and we must stop pretending this doesn't matter.

It is the FOREST SERVICE'S JOB TO PROTECT AND DEFEND.

Please, do your job. We need these older forests for our children's children and many generations to follow. We have conducted over a century of destructive forest practices and this is our opportunity to turn that around.

Thank you for listening, thank you for ACTING in your role as stewards of the land.