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MCAT, Mobilizing Climate Action Together, Comments on Notice of Intent for the Northwest Forest Plan

RE: Comments on the Revision of the Northwest Forest Plan

We thank you for this opportunity to comment on the NWFP. When Judge Dwyer ruled against the USFS some 30 years ago, his aim was to ensure that the USFS stopped breaking the law, that is, the Endangered Species Act. **A number of endangered species continue to face the crisis of extinction. Now we face the existential crisis of climate change which requires the USFS to act in ways that will help mitigate climate change.**

One of the more extraordinary results from the Dwyer ruling was the first and only creation of an ecosystem-based forest management plan. We urge the USFS to develop a revised plan that addresses new challenges, especially climate change, so that the plan remains relevant well into the 21st Century. We are also pleased to know that you now have indigenous people seated on your Committee to revise the NWFP.

For nearly 45 years after WWII, the USFS very purposely worked to remove all old growth trees throughout our Northwest forests under the misguided notion that these trees were “decadent” and needed to be removed to make way for faster growing younger trees. Now through better-informed science, we know that these older trees are the true champions in terms of carbon storage. We know that these older forests store more carbon on a per acre basis than any other forests in the world.

We ask that the USFS practice climate smart forestry throughout the Pacific Northwest region, which we define as forestry that optimizes carbon sequestration, storage and resiliency, **protects all mature and old growth trees**, and maintains a diversity of species, ages, and structures.

One of the most significant changes we face as a result of climate change is an increase in the frequency and severity of wildfires. Some suggest that the solution is fire reduction achieved through logging and thinning. The reality is that scaling up logging and thinning results in all kinds of co-lateral damages including loss of biodiversity, harm to water supply watersheds, and increased CO₂ emissions only exacerbating the climate crisis. The root cause of the increase in wildfires, especially on our dry-side forests east of the Cascades is primarily a result of climate change. Our forests are dryer in the summer than in the past, we are experiencing reduced snow-packs, and now have longer fire seasons with more human-caused ignitions. While prescribed burns will not in itself solve the wildfire problem, some prescribed and cultural burns may be appropriate in mature and old growth forests as long as that is not accompanied by commercial logging.

Importantly, we urge the UFS to apply the best available science moving forward as significant research during the past 30 years has helped us better understand fire ecology and the importance of old growth in carbon storage. Additionally, we ask that the USFS recognize and use traditional stewardship practices of indigenous land managers that align with the best available science.

As a result of unsustainable levels of logging for the 45 years prior to the Dwyer ruling, very little old growth remains in the Pacific Northwest. Most importantly the USFS needs to create the conditions to enable mature forests to become old growth forests. Over time the USFS can restore our Pacific Northwest forests to the conditions they were in at the time of the founding of the USFS in 1905. Rather than the current reality of only 10% of the forest existing as old growth, some 75% or more old growth could exist across the landscape in the future. By far our best natural climate solution to drawdown carbon is to simply grow trees longer.

We call upon the USFS to dedicate our forests as carbon reserves so that 100 years from now the USFS legacy will be one of extraordinary conservation and preservation, of doing its part to mitigate the climate crisis and at the same time promote biodiversity, ensure safe drinking water, provide expansive recreation opportunities, and perhaps, most importantly, provide for spiritual nurturance.

Sincerely,

Rand Schenck
Forestry and Natural Lands Lead
MCAT, Mobilizing Climate Action Together