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First name: Tim

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Organization:

Title:

Comments: Dear Regional Foresters Buchanan and Eberlien,

Thank you for accepting my comments on the Northwest Forest Plan Amendment Draft Environmental Impact Statement. As a resident of southwestern Oregon, I care deeply about public lands and the future of the Northwest's National Forests.

Thirty years ago, the Northwest Forest Plan ended the liquidation of our region's old growth forests, providing hope for imperiled forest wildlife and ushering in a more thoughtful recognition of the relationship between forests and aquatic ecosystems. After three decades, it's now time for updates to address climate change and wildfire risks and the need for stronger Tribal inclusion, but I am concerned that the proposed alternatives stray too far from the plan's original aim of conservation.

In particular I am concerned that the USFS's proposal to increase the age limit of trees available for logging from 80 to 120 years in moist forests and from 80 to 150 years in dry forests will significantly reduce the extent of mature and old growth forests in our region, causing harm to a range of threatened and endangered species that depend on these forests, including the northern spotted owl, marbled murrelets, and coastal martens. Salmon and steelhead also benefit from clean water and healthy stream habitats that old-growth forests provide. Mature and old trees are also most fire resistant and sequester the most carbon --and so it seems short-sighted to increase logging of the very trees that are most needed to restore degraded forest habitats.

I'm also concerned that the Plan's simplistic moist-dry framework does not account for the complexity of the unique mixed conifer-broad-leaved evergreen forests of the Klamath Siskiyou Mountains, which are considered "dry" forests even though these forests can receive 200 inches of rain per year. These highly biodiverse forests have a mixed-severity fire regime and many unique tree and fire-adapted plant species that necessitate a more careful guidance to ensure that the special values of the region's ecosystems are not lost with a generalized cookie-cutter approach that allows trees up to 150 years old to be logged off. In addition, this region has extremely steep slopes and a notably high density of streams, making many areas less suitable for logging.

In conclusion, I'd like to see any amendments continue the Northwest Forest Plan's emphasis on conservation that protects endangered species, maintains habitat connectivity, and supports natural climate solutions by sequestering carbon while prioritizing targeted forest management in wildland-urban interface areas to more efficiently and safely protect homes and communities from wildfire risks.

I am attaching a socioeconomic analysis that I ask you to also consider.

Sincerely,

Tim Palmer

Attached: PDF of a report titled "Deficiencies in the Socioeconomic Elements of the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan Amendment (NWFPa)" by Ernie Niemi dated March 10, 2025.