

Data Submitted (UTC 11): 8/25/2021 8:54:19 PM

First name: Ken

Last name: Goldsmith

Organization:

Title:

Comments: I have significant concerns about the Draft Forest Plan and EIS:

Alternative B recommends just 34,000 acres for new wilderness across the entire 3.16-million acre GMUG. Compare that with the 125,000 acres that the Forest Service recommended during the Bush administration in their 2007 planning effort. The final plan must include significantly more wilderness recommendations.

The Forest Service does not adequately consider the Community Conservation Proposal. The Community Conservation Proposal must be better reflected - and incorporated - in the final plan.

Alternative B identifies 948,200 acres of land as "suitable" for timber production, compared to 468,000 acres in the current plan. Every alternative in the draft plan posits a significant increase in suitable timber, which is a designation that interferes with consideration of responsible management of the forests that allow uses other than timber production. The draft plan prioritizes logging over conservation. This is wrong.

Under the planning rule, the Forest Service is required to identify species of conservation concern (SCC) - species that are imperiled but not quite to the point where they need to be listed under the Endangered Species Act - and to provide ecological conditions and protective plan components to maintain their viability. However, the Forest Service failed to include as SCC several vulnerable species that deserve this designation, such as the American marten, bighorn sheep, northern goshawk, boreal owl, Lewis's woodpecker, flammulated owl, and imperiled bats. Also, plan components for protecting SCC are weak in many cases. The draft plan does not adequately protect the diversity of imperiled species that occupy the GMUG.

The lack of new wilderness recommendations, massive increase in lands suitable for timber harvest, the poor protection for rare wildlife species, and other issues make this proposed plan unacceptable. Substantial changes in the draft plan are thus needed.