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Organization: Emerald Chapter, Native Plant Society of Oregon

Title: President Comments:

January 31, 2024

Dear Sir,

The Native Plant Society is dedicated to the enjoyment, conservation and study of Oregon's native plants and habitats. We are supportive of maintenance of biodiversity of plants, lichens and fungi across the landscape.

After listening to some of the RAC discussions this week, I would like to submit a couple of thoughts regarding the effects of NW Forest Plan Amendments on native plant and fungi communities in the Pacific Northwest. My comments fall within the old growth "bucket". Some of my comments (maintenance of the survey and manage program in order to maintain persistence of old-growth dependent species diversity) may not be in the top tier of priority for the amendment, but I would still like to go on record as supporting their inclusion as nexus issues related to your large bucket old growth item.

Old Growth

The reason the Survey and Manage species list and Standards and guidelines were created was that Northwest Forest Plan provided only a coarse-filtered approach to species protection; persistence of many rare, old-growth related botanical species were not assured under the land allocations alone. Surveys were implemented to make sure management activities did not locally extirpate populations.

*In order to assure persistence of old-growth related species, the Forest Service should continue survey and manage surveys where there will be management in mature and old-growth so that decision-makers can understand tradeoffs and, if they follow NFMA, ensure species persistence within watersheds.

Many old-growth dependent botanical species require patches of habitat, or corridors, across the landscape because they are dispersal-limited.

*Maintain corridors for dispersal-limited old-growth species. Consider inclusion of not only the large old growth patches within Matrix, but smaller 3-5 acre patches of old growth that can function as corridors between LSRs for these species.

Please let me know if you have questions about any of our comments or suggestions above.

Sincerely yours,

Jennifer Lippert
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