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First name: Mark Last name: N Organization:

Title:

Comments: [External Email]88 FR 87393 - Region 5 and Region 6; California, Oregon, and Washington; Forest

Plan Amendment for Planning

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To: Dennis Dougherty, Planning Portfolio Supervisor

Please accept my comments concerning the proposed Northwest Forest Plan amendment. The forests of this region are important to me as a source for wildlife habitat, recreation, and personal renewal. I have visited and hiked in these forests many times. In addition, they are incredibly important for storing carbon and mitigating the effects of climate change.

I have concerns that the Forest Service is using an abbreviated planning process for this amendment. This plan is important, and in order to maintain and strengthen its ecosystem-based conservation goals, the agency should use a transparent, science-based approach that includes and reflects public values, Tribal concerns, and the needs of future generations.

Here are key points that should be considered:

President Biden's 2022 Executive Order on forests and the climate gave the Forest Service clear guidance that it should prioritize the protection and restoration of mature and old-growth forests (trees generally over 80 years old) across the nation as a natural carbon and climate solution. The Northwest Forest Plan governs the largest natural carbon reserves found anywhere in North America, and an amendment must recognize and safeguard the vast amount of carbon that can be sequestered and stored in these forests. The general direction to conserve trees over 80 years old in designated reserves has begun to reverse the loss of old-growth to logging, which in turn has turned Pacific Northwest lands managed by the Forest Service from a carbon source to a carbon sink. However, not all of these older forests were protected under the plan, and every timber sale emits carbon to the atmosphere. The plan amendment should protect all mature and old-growth trees and forests.

Preserving biodiversity and connected wildlife habitat across the region should be a core principle of any forest plan revision. This includes not only threatened species, but others that have been impacted by the loss and fragmentation of their habitat, and those pending for listing under the Endangered Species Act.

In light of the removal of BLM forests' removal from the Forest Plan's regional reserve system, new information about the importance of older forests for the climate, and the ongoing needs of wildlife for connected habitat, any amendment to the plan should enhance protected, connected, and redundant reserves by including all mature and old-growth forests and core wildlife areas without roads (1000 acres or larger). The reserve network,

including riparian reserves, should have clear and enforceable limits on logging and road impacts.

Do not rush this amendment. It is too important for shortcuts.

Thank you for allowing me to submit comments.

Mark Nelson

Ripton, VT

The wildlife, wild lands, and wild waters need our voices for their protection.