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Comments: Thank you for the opportunity to comment on the Blue Mountains Forest Plan Draft Preliminary Need to Change.

Beginning with the Abstract, I appreciate the specific reference to the monitoring plan, which must be sustainably funded for long term analyses and sufficiently robust to inform the adaptive management approach (as cited in the Introduction) and evaluates specific projects and actions for their effectiveness, as evaluated in a Before-After-Control-Impact design.

I also appreciate the opportunity here to identify several additional issues and areas of concern that must be included and directly addressed if the plan is to be relevant to present and emerging forest conditions and trends.

As noted in the Introduction, the plan provides "overarching direction for all management decisions", yet the Introduction itself completely omits climate change as a driver of changes in forest condition, along with the growing assertions of native and treaty rights, the sixth mass extinction, and the ascendance of ecological science to inform an ecocentric management framework.

Also omitted, yet crucial to the Forest Plan, is a recognition of the significant changes in global markets and political economies, and their resultant effects on extraction industries, e.g. logging, in the last 50 years, an inexorable decline described in the BMFP Needs Assessment.

As a welcome shift towards a more ecocentric management regime, The 2012 Planning Rule paragraph correctly provides for a "planning framework...that guides ecosystem management", an adaptive management approach, and "requires consideration of climate change as a system stressor and driver".

To meet the 2012 Planning Rule social and economic sustainability component requirements, as cited in Address Contributions to Social and Economic Sustainability, the BMFP must contribute to increased economic diversity and decreased local reliance on extractive industries, including logging, grazing, and mining. This need for greater economic flexibility in BMFP affected counties was previously presented in the Needs Assessment.

The paragraph Address a Changing Climate acknowledges the needs to: 1. Identify and respond to its effects; and 2. Manage for flexibility and resilience. The BMFP needs to add a third component to this strategy: 3. Forests as mitigation, i.e. carbon sinks.

There is strong consensus in the scientific community, in government, and among the general public that we are in a climate emergency.

How is the BMFP responding to that emergency with the urgency that it requires?

The 2023 IPCC Report specifically cites the need for forest preserves as protected under the Biden Administration 30X30 Plan, which receives no mention whatsoever in the Draft Preliminary Need to Change.

Maintain or Restore Ecosystem integrity and Reduce Wildfire Risks to Habitats and Communities: To be most effective in service to adjacent local communities, the BMFP must assess its "landscape management" on a cost/benefit and effectiveness basis in comparison with home hardening and defensive perimeter actions. Additionally, the BMFP must assess the comparative costs and benefits (social, economic, and ecological) between commercial logging and hand thinning.

Lastly, the Draft Preliminary Need to Change completely elides any mention of lands with wilderness qualities; or of roads and their impacts on ecosystems, hydrology, water quality, and wildlife; or of livestock grazing and its adverse impacts on the forest.

This decision appears to be in direct response to the harassment Forest officials and staff received at public meetings and raises serious doubts about the integrity of further public engagement as described in "Work together to create durable, implementable, integrated land management plans".