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Comments: To whom it may concern from the Forest Service,
I am a student at Eastside Preparatory School in Kirkland, Washington. I am interested in forestry and economic preservation. I am submitting comments regarding the proposed amendments to Forest Service and Bureau of Land Management (BLM) planning documents under the Northwest Forest Plan (NWFP). While the plan presents a framework for ecosystem-based management, several aspects require greater scientific rigor and stronger protections to meet conservation objectives.

1. Late-Successional Reserve Protections (Section III.B)
Firstly, the NWFP allocates 30% of federal lands as Late-Successional Reserves (LSRs) to preserve critical old-growth habitat for species like the northern spotted owl (Strix occidentalis caurina) and marbled murrelet (Brachyramphus marmoratus). However, the plan permits thinning and salvage logging in stands under 80 years of age.

Current ecological research shows that thinning in late-successional forests can disrupt many factors essential to species survival (Franklin et al., 2002; Spies et al., 2018). The Forest Service should prohibit commercial thinning in LSRs when possible unless peer-reviewed scientific evidence demonstrates a net ecological benefit.

2. Riparian Reserves and Aquatic Conservation Strategy (Section III.C)
Secondly, the decision to allocate 11% of the planning area (2.6 million acres) as Riparian Reserves is a critical step for protecting aquatic ecosystems and at-risk salmonid species. However, the initial fixed-width buffers (300 feet for fish-bearing streams) should be expanded based on watershed analysis rather than reduced.

Scientific literature indicates that narrower buffers often fail to protect stream temperature and sediment filtration (Hawes, Ellen et al., 2005). The final plan should require watershed-based adjustments that prioritize the maximum scientifically supported buffer widths.

3. Adaptive Management Areas (Section III.B)
Thirdly, the establishment of 1.5 million acres of Adaptive Management Areas (AMAs) creates opportunities for collaborative experimentation. However, the plan lacks clear scientific guidelines for evaluating AMA outcomes. Without rigorous monitoring and peer-reviewed assessment protocols, AMAs could become loopholes for increased logging.

I recommend that the Forest Service adopt mandatory 5-year ecological performance reviews and independent scientific audits for all AMA projects to ensure they align with the NWFP's biodiversity and climate resilience goals.

4. Carbon Sequestration and Climate Change (Not Addressed in the ROD)
The NWFP does not adequately incorporate the role of federal forests in carbon sequestration and climate change mitigation. Old-growth forests in the Pacific Northwest are globally significant carbon sinks, storing up to 1,000 metric tons of carbon per hectare (Law et al., 2018).
I urge the Forest Service to integrate carbon accounting metrics into forest planning decisions and prohibit commercial logging in any stand over 80 years of age as a climate mitigation strategy.

Conclusion
The Northwest Forest Plan represents an ambitious attempt to balance economic and ecological goals, but its success will depend on the rigorous application of science-based safeguards. I urge the Forest Service to adopt

stronger protections for late-successional forests, implement transparent monitoring protocols, and prioritize climate resilience in all future amendments.
Thank you for the opportunity to comment.

Works Cited

Franklin, Jerry F., et al. "Disturbances and Structural Development of Natural Forest Ecosystems With Silvicultural Implications, Using Douglas-fir Forests as an Example." Forest Ecology and Management, vol. 155, no. 1-3, Jan. 2002, pp. 399-423. https://doi.org/10.1016/s0378-1127(01)00575-8.

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Hawes, Ellen, et al. Riparian Buffer Zones: Functions and Recommended Widths. By Eightmile River Wild and Scenic Study Committee, 2005, www.hebronnh.gov/sites/g/files/vyhlif3256/f/uploads/riparian_buffer_science_yale.pdf.

Law, Beverly E et al. "Land use strategies to mitigate climate change in carbon dense temperate forests." Proceedings of the National Academy of Sciences of the United States of America vol. 115,14 (2018): 3663-3668. doi:10.1073/pnas.1720064115. https://pubmed.ncbi.nlm.nih.gov/29555758/