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First name: Roberta

Last name: Richards

Organization:

Title:

Comments: Hello and thank you for your steadfast support for Oregon's forests over the years. I am writing in support of a strong Northwest Forest Plan. This is an issue I feel personally invested in, as I used it as part of a dissertation I wrote for the University of Southern California in 1994: "How shall we think about loggers and owls? Principles for an applied environmental ethic." My research used the Northwest Forest Plan as a practical example of how to balance seemingly incommensurate values such as jobs and biodiversity.

I am alarmed to learn that the U.S. Forest Service is proposing an amendment to the Plan that prioritizes and accelerates logging, and puts our forests, fish, wildlife, clean water, and climate at risk. Alternative B (the Proposed Alternative) and Alternative D options in the Draft EIS would extend the threshold on logging from 80 year stands to 120 in moist forest and 150 in dry forest. This weakening of the Plan would conflict with the foundational objective for the forest plan to adequately protect endangered and sensitive species like the Marbled Murrelet, Northern Spotted Owl, and Humboldt's flying squirrel that depend on closed-canopy mature and old-growth forests for survival. I urge you to retain the threshold at 80 years.

With the acceleration of the climate crisis, environmental ethical issues have grown far more challenging in the 30 years since I wrote my dissertation, and the Northwest Forest Plan is more important than ever. The value of northwest forests for carbon sequestration cannot be understated. Longer forest rotations leave mature and old-growth trees on the landscape and manage for higher forest complexity to sequester as much carbon as possible.

Northwest forests have value far beyond the economic ones. Please ensure that the final plan prioritizes biodiversity and ecosystem stability, which in the long run are the foundation for a sustainable economy. (If you would like to read my dissertation, I would be happy to blow off the dust and share it!)

Thanks you,
Roberta Richards, Ph.D.