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Comments: As a research economist, I would like to comment on several key points from the proposed Northwest Forest Plan Amendment #64745, focusing on the economic implications and potential policy recommendations:

First, the urgency of addressing climate change cannot be overstated from an economic perspective. The DEIS's climate analysis appears to underestimate the rapidity of climate-driven events, which could lead to significant economic costs. Recent economic studies have shown that the social cost of carbon is likely much higher than previously estimated (e.g., Rennert et al., 2022, EPA, 2024). The world-class carbon sequestration potential of wet and rainforest ecosystems in the Pacific Northwest represents a valuable natural asset that should be prioritized in forest management decisions. Prior to allowing irrevocable destruction of valuable resources, it would reduce risk to conduct a comprehensive economic valuation of the carbon sequestration services provided by these forests, incorporating the latest estimates of the social cost of carbon.

Next, the proposal to limit commercial timber removal in wet and rainforest temperate ecosystems aligns with recent economic research on the value of intact forest ecosystems. Studies have shown that the non-timber values of forests, including watershed protection, biodiversity conservation, and recreational opportunities, often exceed the economic benefits of timber extraction (e.g., EPA, 2012).

Finally, the proposal to allow commercial harvest in Late Successional Reserves (LSRs) up to 119 years of age is economically short-sighted. Old-growth forests provide unique ecosystem services and biodiversity benefits that increase in value over time. Recent economic studies have shown that the preservation of old-growth forests can yield higher long-term economic returns than timber harvesting when accounting for all ecosystem services (e.g., ESSA Technologies, 2021).

In conclusion, the Northwest Forest Plan Amendment should prioritize management strategies that maximize the long-term economic value of forest ecosystems. This requires moving beyond traditional timber-focused economic assessments to incorporate the full range of ecosystem services and natural capital values. By doing so, we can develop forest management policies that are not only ecologically sound but also economically beneficial for current and future generations, and ultimately serve the Forest Service's legal obligation to sustainable yield and conservation of threatened species.