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First name: Daniel Last name: Harm Organization:

Title:

Comments: Dear project official,

Thank you for the opportunity to give public comment on the Northwest Forest Plan amendment process.

Over its first 30 years, the plan has had the additional benefit of boosting progress toward carbon reduction goals as management choices result in retention of the old growth and mature forest critical to carbon sequestration and storage at scale (USFS Pacific Northwest Research Station, Watts et al. 2017). The only alternatives that should be considered in this amendment process are those that maintain and expand protections for old growth and complex mature forest through measures like the Late Successional Reserve designation and Aquatic Conservation Strategy. I support a modified Alternative B (B+) to better recruit old forests, burn dry forests, improve habitat connectivity, protect aquatic ecosystems, and restore old forests in Reserves.

The addition of climate change adaptation into forest planning is essential. We need to continue to harmonize forest management across ownerships to prepare for exacerbated climate impacts like flooding, drought, wildfire, and hotter temperatures. However, guardrails are needed for forest health and wildfire resilience projects in older forests to ensure that ecological function and climate goals remain a priority over maximizing timber revenues. The current language proposed for expanding active management on federal lands should be amended to reflect an ultimate prioritization of the plan's original science-based, species and habitat-oriented goals.

Indigenous stewardship of forests has shaped our landscape since time immemorial, and is essential to building a climate resilient future for our region. The incorporation of Tribal consultation and co-stewardship of our federal forest lands is a long-awaited and much needed addition to the NFP. Adopted elements should support Tribal comanagement and co-stewardship informed by indigenous knowledge, access to culturally important sites, subsistence hunting and gathering on federal lands, and other issues of interest to Tribes. The plan should ensure that these elements are successfully and sustainably implemented.