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Comments: Dear Forest Service Planning Team,

As a forest ecologist and soil biologist, I am writing to urge the Forest Service to include strong, enforceable, and measurable standards in the revised Forest Plan to ensure the long-term ecological integrity of our national forests. The current draft's reliance on voluntary and subjective guidelines represents a significant step backward from decades of progress in forest conservation and adaptive management.

For over 30 years, the protective standards in existing Forest Plans have served as an essential foundation for maintaining ecosystem health[mdash]protecting mature and old-growth forests, riparian systems, wildlife habitat, soil productivity, and carbon storage. These standards provided a level of accountability and consistency that allowed the Forest Service to balance multiple uses while ensuring ecological sustainability. Eliminating or weakening them undermines both the credibility and effectiveness of the management framework.

1. Importance of Enforceable Standards

Enforceable standards are critical for maintaining ecological resilience in the face of accelerating climate change, invasive species, and cumulative land-use impacts. Without clear, measurable thresholds, management decisions risk becoming discretionary and inconsistent, leading to degradation of key resources such as soils, water, and habitat connectivity. The Forest Service should retain and strengthen the protective standards from prior plans rather than replace them with vague "desired conditions" that lack accountability or measurable outcomes.

2. Protection of Mature and Old-Growth Forests

Mature and old forests play an outsized role in carbon sequestration, microclimate regulation, and biodiversity conservation. They provide irreplaceable structural complexity and soil stability that take centuries to develop. The revised plan must include explicit, enforceable standards that prohibit commercial logging of old-growth stands and restrict removal of mature trees that are vital for recruitment into future old-growth conditions. These forests are our most effective natural climate solutions.

3. Safeguarding Soils and Water Quality

Healthy soils are the foundation of forest ecosystems. Logging, road construction, and mechanical treatments can cause long-lasting soil compaction, erosion, and nutrient loss. The plan must include quantifiable soil disturbance limits and riparian buffer standards that protect hydrologic function and water quality. Unroaded areas, in particular, should remain undisturbed to preserve their role in maintaining clean water, intact mycorrhizal networks, and carbon storage.

4. Wildlife and Landscape Connectivity

The loss of landscape connectivity and habitat quality poses serious risks to wildlife populations, especially those already facing range fragmentation and climate stress. The plan should include binding habitat retention and corridor connectivity standards to ensure that wildlife can move, migrate, and adapt across the landscape. Broad, discretionary "desired conditions" are insufficient to achieve these outcomes.

5. Climate and Carbon Considerations

Given the urgency of the climate crisis, forest management must explicitly account for carbon storage and emissions. Old and mature forests serve as significant carbon reservoirs; any plan revision that weakens their protection would directly undermine national climate goals. Standards should ensure that management actions are evaluated for their net carbon impacts, and that forest carbon stocks are monitored and maintained over time.

In conclusion, I strongly urge the Forest Service to revise the draft plan to include clear, science-based, enforceable standards that protect the ecological integrity of our national forests. Voluntary guidelines cannot substitute for binding commitments to conserve the natural systems that sustain biodiversity, water quality, soil health, and climate stability.

Thank you for the opportunity to comment and for your continued commitment to stewarding these irreplaceable public lands for future generations.

Sincerely,
Maya Elson