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Comments: I am writing as an endangered wildlife species and old growth forests protection advocate because old-growth forests provide trees big enough to contain the large nest cavities pileated woodpeckers need for nesting and an abundance of insects for the birds to feed on. However, I am now very concerned because as the climate changes, old forests that woodpeckers and other wildlife depend on are increasingly threatened with destruction.

At this time, I very much appreciate the fact that the Biden Administration has just announced a plan to conserve old-growth forests across the United States. I am now writing to offer comments on the December 19, 2023 Notice of Intent to prepare an Environmental Impact Statement to amend 128 forest plans to manage older federal forests in the face of a changing climate. Our nations federal forests provide clean water, habitat for wildlife and cold-water fisheries, opportunities for recreation, economic activity, and are invaluable vessels for storing carbon. This is especially true of older forest ecosystems. The Notice of Intent is an important step toward the Forest Service and Bureau of Land Management adopting policies and practices to protect these forests, and pursue ecologically appropriate management to ensure that these forests continue to embody the values, and provide the amenities that they have for generations.

As we are all aware, the growth in frequency, size, and severity of wildfire in older forests threatens their ability to continue to deliver valuable resources. Passive, custodial management of many of these forests is appropriate. However, in other forest locations, active management is essential to making them resilient to wildfire. Good management can reduce the effects of wildfire while maintaining and enhancing older forest ecosystems. Increasing the ability of federal forests to respond to disturbance such as wildfire is vital to protect clean water, wildlife habitat, and absorb carbon.

Since its establishment in 1994, the Northwest Forest Plan (NFP) has largely been a success story: slowing the decline of several endangered species, protecting large swaths of old-growth forests, and improving watershed conditions. However, changing temperature and precipitation patterns throughout the Pacific Northwest are creating new climate-driven threats to forest health while magnifying impacts from insects, disease, and historically large and severe wildfires. These pressures, along with increased scientific understanding and information gleaned from the NFPs monitoring protocols, highlight the need for targeted updates to the plan to maintain healthy, resilient forests.

To meet these challenges and to secure the health of these forests into the future, for people and for nature, the agency should take a targeted, science-based, and climate change-informed approach to amending the NFP.

Specifically, the amendment should focus on defining goals for sustaining ecological integrity of these national forests, as well as strategies for their achievement that are informed by an understanding of the ongoing and anticipated effects of climate change and improving landscape resilience to wildfire by restoring forest health where it is impaired and returning ecosystem-appropriate fire to the landscape.

I strongly support all measures to conserve existing old-growth forests and recruiting future generations of old-growth forests. Please remember that the incorporation of Indigenous knowledge to help inform the agencies management goals and strategies to further the agencies general trust responsibilities will support the sustainability of communities located near these national forests by providing an array of sustainable recreational opportunities and forest products.

Equally important is the ability to adapt to disturbance and changing conditions on the ground. The land management agencies should adopt standards to create forest conditions across the landscape that provide for wildlife habitat and migration as the climate changes and species are increasingly threatened by associated weather events.

Finally, adoption of an old forest network, as the Notice of Intent proposes, that identifies younger forests to become part of the old forest age class would significantly contribute to adaptation and resilience. These forests supply clean water, habitat, and absorb carbon as well, and contribute to a dynamic and vibrant forest system.

At this time, I thank you for your consideration of my letter and for the opportunity to comment on this

important Notice of Intent. Managing our federal forests for their many uses and resources is not easy, but adopting policies focused on protecting old forests and adaptation and resilience is essential if these forests are to persist into the future. I appreciate and thank you for undertaking this timely, targeted and science-based update in the Pacific Northwest Forest Plan.

Sincerely,

Jean Marie Naples, MD-Ph.D.