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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 nation's 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.

I thank you for taking action to conserve our old-growth forests with the first ever nationwide forest plan amendment. This is a swift, decisive and much needed action that will help stem the twin crises of biodiversity loss and climate change, while conserving forests for future generations.

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.