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First name: Jean

Last name: Naples

Organization:

Title:

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.

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 agency's management goals and strategies to further the agency's 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

I very much appreciate and thank you for proposing a nationwide plan amendment to address the long-term persistence, distribution and recruitment of old-growth forest across national forest systems. This proactive step will help protect the country's oldest trees. However, to truly safeguard their vital role in mitigating the climate crisis, you must make the amendment significantly stronger.

According to the proposed amendment, "Vegetation management within old-growth forest conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons." This leaves a significant loophole that would allow old-growth trees to be logged nationwide, undermining the contributions old-growth forests and trees make to climate resiliency and healthy ecosystems.

The U.S. Forest Service no longer proposes projects primarily for economic reasons. Its logging projects are now proposed for outcomes that include resilience and wildfire mitigation. However, too often these terms are misused to justify destructive logging and road-building projects. The agency should not sell old-growth trees.

It is crucial for Secretary Vilsack to understand that there is a deficit of old-growth trees and forests on federal lands. They should be left standing so they can store carbon, provide ecological integrity, increase biodiversity, improve watershed health, and enhance wildfire resiliency.

I strongly urge you to please remove all language in the amendment that would allow old-growth trees and forests to be logged other than in the very rare circumstances of imminent risk to public safety and request that you use this opportunity to formalize a commitment to protect mature trees because if these trees are left to grow, they will become the old growth of tomorrow.

I thank you for initiating this process to secure the long-term health of old-growth forests. Although these important forests provide numerous benefits to people and to nature, they are present on only a fraction of the landscape they once covered. This reality, along with the increasing stressors that these forests face from climate change, highlights the need and urgency for national direction to secure the conservation and health of our remaining old-growth forests.

As the agency refines its old-growth proposal, I urge you to please undertake on-the-ground identification of old-growth stands to ensure that the proposal's plan components are applied to the appropriate places and please clarify when proactive management can occur to ensure that management is driven by forest health needs.

It is vital to ensure robust engagement of the public and Tribes in developing local or regional Adaptive Strategies for Old-Forest Conservation and to provide adequate resources to support the proposal's monitoring requirements so that the efficacy of the management approaches can be assessed and adapted, as needed, to meet the proposal's goals.

I urge these actions because fostering nationwide data transparency by publicizing information compiled through the National Old-Growth Monitoring Network, as well as information on vegetation management projects occurring either in old-growth stands or in priority fire sheds under the agency's Wildfire Crisis Strategy.

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 recognizing the many important values that protection for our old-growth forests through the initiation of this process and 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.