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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 am pleased that your proposed reforms would consistently safeguard our remaining old-growth in national forests across the country, curb economically driven logging of old-growth forests and strive to grow more old-growth to bolster what little we have left. It is imperative that the proposed amendment include strong, explicit direction that results in identifying areas across our national forests that will be a priority for recruiting future old-growth. I appreciate the inclusion of Indigenous knowledge, Tribal co-stewardship and Tribal sovereignty in the proposed policy and I encourage you to please strengthen this aspect of the policy, including recognition of Tribal treaty rights.

I also believe that while a national plan amendment is a good first step, regulation offers more durability. The Forest Service should consider opportunities to develop new or revise existing regulations to provide this durability. The remaining population of old-growth forest is very small; just 13% of the national forest estate is old-growth. However, careful stewardship of plentiful mature forests can help restore old-growth for future generations.

A healthy, sustainable future is dependent on the actions we take now to secure our forests. Thank you for listening to public voices in this process 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 including recognition of Tribal treaty rights. I also believe that while a national plan amendment is a good first step, regulation offers more durability. The

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.

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.