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Comments: [External Email]Please update the NW Forest Plan to protect our mature and old-growth forests.

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Dear Ms. Buchanan,

I'm writing to provide scoping comments on the Forest Service's notice of intent to prepare an environmental impact statement for an amendment to the Northwest Forest Plan. US Forest Service; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl, Notice of Intent to Prepare an Environmental Impact Statement, 88 Fed. Reg. 87,393 (Dec. 18, 2023) (hereinafter, Northwest Forest Plan [NFP] amendment).

The Northwest Forest Plan is an unprecedented, science-based, regional ecosystem management plan to ensure the viability of fish and wildlife associated with late-successional and old-growth forest ecosystems in the Pacific Northwest and to economically support local communities. These forest ecosystems are vital to our region, providing cold, clean water and other ecosystem services for people and wildlife, mitigation against climate change, older forests that support enormous biological diversity, inspiring places for contemplation and recreation, and job opportunities. Since its establishment in 1994, it has improved watershed conditions and reduced threats to mature and old-growth forests and the plants and animals living there, including many very rare, unique species only found in the Pacific Northwest.

However, impacts from climate change are increasing in intensity and frequency, magnifying natural disturbances from fire, drought and flood events. These stressors, along with increased scientific understanding and information from the NFP's monitoring actions, highlight the need for targeted NFP updates to maintain healthy, resilient forests and watersheds.

To meet these challenges and to secure healthy ecosystems into the future, the Forest Service should take a targeted, science-based approach to amend the NFP for climate resilience. Specifically, the amendment should:

Protect mature and old-growth stands in moist forests and protect mature and old-growth trees in seasonally dry forests. Older stands and trees are inordinately important for storing carbon, supporting biological diversity, and resisting stress from fire, drought, and other disturbances.
Recognize and address threats from climate change, such as an increasingly fierce flood and fire activity. Accordingly, the amendment must establish clear standards and guidelines for reducing road density to 1-2 miles/m2 and hydrologically decoupling the road network from aquatic ecosystems. In the uplands, restore landscape spatial patterns of vegetation that increase resilience to disturbance, as well as characteristic fire activity in drier forests.
Establish habitat connectivity standards and guidelines for wildlife moving to adapt to changing climate and habitat conditions, including establishing road density standards and other measures, especially proximate to crossing structures or other identified connectivity pathways.
Incentivize prescribed and managed burns at scale and frequency to restore ecologically characteristic fire activity in fire-prone forests and, more broadly, incorporate Indigenous cultural burning practices.

Partner with Tribes to develop management goals and strategies related to co-management and co-stewardship informed by indigenous knowledge, access to cultural and religious sites, cultural burning, indigenous hunting and gathering on national forests, and other issues of interest to Tribes.
Support local communities through the creation of a restoration workforce, providing economic opportunities for smaller, local firms, processing of restoration by-products, supporting sustainable recreation opportunities, and other measures.
Maintain and improve protections for at-risk fish and wildlife and ensure that plan components sustain the ecological integrity of national forests.

Thank you for this opportunity to provide comments on the Forest Service's proposed climate-smart amendment to the Northwest Forest Plan.

Regards,
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