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Comments: [External Email]Update NW Forest Plan - protect mature forests!

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Dear Ms. Buchanan,

I'm writing for our whole family of four taxpaying and voting adults to provide 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).

We understand the Northwest Forest Plan is an unprecedented, science-based, regional ecosystem management plan to ensure viability of native fish and wildlife associated with late-successional and old-growth forest ecosystems in the Pacific Northwest and to economically support local communities. We know these forest ecosystems are VITAL to our region. They provide cold, clean water and many other ecosystem services for people, wildlife, mitigation of climate change, biological diversity, inspiring places, and job opportunities. We understand that since the Plan's establishment in 1994, it has improved watershed conditions and reduced threats to mature and old-growth forests. These forests provide habitat for a diversity of plants and animals, including many very rare, unique species found only in the Pacific Northwest.

We also know the impacts from climate change are increasing in intensity and frequency, magnifying natural disturbances from fire, drought and flood events. We appreciate that 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, we agree that the Forest Service should take a targeted, science-based approach to amend the NFP for climate resilience. Specifically, the amendment should:

1. Protect mature and old-growth stands in all forests, in both wet and seasonally dry areas. We appreciate that older stands and larger trees are inordinately important for storing carbon, supporting biological diversity, and resisting stress from fire, drought, and other disturbances.
2. Recognize and address threats from climate change, such as increasingly fierce flood and fire activity. Accordingly, this amendment must establish clear standards and guidelines for reducing road density to 1-2 miles/m<sup>2</sup> and hydrologically decoupling road networks from aquatic ecosystems. This means in uplands, restoring spatial patterns of vegetation in landscapes that increase resilience to disturbance, as well as characteristic fire activity in drier forests.
3. Establish habitat connectivity standards and guidelines for wildlife moving to adapt to changing climate and habitat conditions. These standards would include establishing road density standards and other measures, especially close to crossing structures or other identified connectivity pathways.
4. Encourage prescribed and managed burns at the scale and frequency needed to restore ecological zones

characteristic of natural fire activity in fire-prone forests. More broadly, the Plan and USFS should work with local Indigenous tribes to understand more about and begin to use, with permission, cultural burning practices.

5. Partner with Tribes to develop management goals and strategies related to co-management and co-stewardship of forests, and respect their deep forest management knowledge.

6. Provide better indigenous access to cultural and religious sites and to hunting and gathering grounds on national forests, and all other issues of interest to Tribes.

7.. Support communities through creation of local restoration workforces, providing economic opportunities for smaller, local firms, local processing of restoration by-products, supporting low-impact recreation opportunities, and other measures.

8. Maintain and improve protections for at-risk fish and wildlife and ensure that plan components sustain the ecological integrity of national forests (such as hosting wolf populations, where appropriate).

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

Dan and Lys Burden

Mike and Dan Brant

Regards,

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