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Comments: I am writing to provide scoping comments on the proposed amendment to the Northwest Forest Plan (NFP) as outlined in the Federal Register Notice of Intent to Prepare an Environmental Impact Statement (88 Fed. Reg. 87,393, Dec. 18, 2023).

The Northwest Forest Plan has been a landmark achievement since its adoption in 1994, providing a science-based, regionally focused approach to managing the forest ecosystems of the Pacific Northwest. It has been instrumental in protecting the biodiversity of late-successional and old-growth forests, ensuring the viability of countless species, and supporting local communities with economic opportunities. The preservation of these forests is vital not only for the health of wildlife and ecosystems but also for providing clean water, mitigating climate change, and offering spaces for recreation and contemplation.

However, with the intensifying impacts of climate change-particularly in the form of more frequent and severe wildfires, floods, and droughts-the need for a targeted update to the NFP is urgent. The proposed amendment to the plan should be responsive to these new challenges, particularly in enhancing forest resilience and the long-term health of both terrestrial and aquatic ecosystems. I support the Forest Service's efforts to amend the NFP to increase climate resilience, and I recommend the following:

1. Protection of Mature and Old-Growth Forests:

The NFP amendment must continue to protect mature and old-growth forests, both in moist and seasonally dry ecosystems. These stands are critical for storing carbon, supporting biodiversity, and providing resistance to climate-related disturbances such as fire and drought. Special focus should be given to ensuring that these vital ecosystems remain protected from degradation and loss.

2. Addressing Climate Change and Disturbance:

The amendment should include specific standards and guidelines aimed at addressing climate-related stressors, such as increasing flood and fire activity. In particular, reducing road density to 1-2 miles per square mile, decoupling roads from aquatic ecosystems, and restoring spatial patterns of vegetation to improve resilience to disturbances are necessary steps. These actions will help improve both forest health and watershed conditions.

3. Habitat Connectivity for Wildlife:

It is critical to establish strong habitat connectivity standards to ensure that wildlife can adapt to changing climate and habitat conditions. This includes reducing road density, creating wildlife corridors, and addressing barriers to movement, especially near identified crossing structures. Enhancing landscape connectivity is key to maintaining biodiversity in the face of a rapidly changing climate.

4. Restoring Ecologically Characteristic Fire Activity:

The amendment should promote the use of prescribed and managed burns to restore characteristic fire regimes in fire-prone forests. Additionally, incorporating Indigenous cultural burning practices should be a priority, as they

have long supported ecosystem health and resilience in the region.

5. Collaboration with Tribes:

I strongly support efforts to partner with Tribal nations to develop management goals and strategies informed by Indigenous knowledge. This includes co-management, co-stewardship, access to cultural sites, cultural burning, and the integration of Indigenous hunting and gathering practices. These strategies are essential for sustaining both ecological and cultural health in forest ecosystems.

6. Economic Support for Local Communities:

The NFP amendment should prioritize the creation of a restoration workforce, offering economic opportunities for local firms, processing restoration by-products, and supporting sustainable recreation. This approach would provide both environmental and economic benefits for communities within the region.

7. Protection for At-Risk Species:

The NFP amendment must continue to prioritize the protection of at-risk fish and wildlife species and ensure that the management goals of the plan uphold the ecological integrity of the national forests. These actions will help preserve the diversity of species that rely on these habitats for survival.

Thank you for the opportunity to provide comments on this important amendment to the Northwest Forest Plan. I urge the Forest Service to adopt a science-based, climate-resilient approach to the plan's update, ensuring that our forests and communities are better prepared for the challenges posed by climate change.

Sincerely,

Carrie Spates