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Comments: RVCC

Rural Voices for Conservation Coalition

September 20,2024

Ms. Linda Walker, Director

Ecosystem Management Coordination

U.S. Forest Service

201 14th Street SW

Washington, DC 20250

Dear Director Walker:

On behalf of the Rural Voices for Conservation Coalition (RVCC), I'd like to thank the Forest Service for their hard work and dedication in developing a framework to protect old growth forests across the country. For rural and Tribal communities, these forests provide carbon storage, biodiversity, recreation settings, cultural value, and more. The effort to conserve these endangered trees and mitigate the threats they face is of the utmost importance.

We appreciate that old growth as a concept is highly place-based and ecosystem dependent. The structure, composition, and characteristics of old-growth forests is highly ecosystem and place-based. What constitutes old-growth should be informed by best available science, including Indigenous Knowledge. For too long, Tribal perspectives and practices have been ignored in forest management. RVCC is very supportive of plan components related to tribal inclusion and the consideration of Indigenous knowledge and encourages the Forest Service to maintain a culture of consistent engagement with Tribal communities and practitioners.

We ask that the Final Environmental Impact Statement includes components that foster a socially durable outcome for mature and old growth management. We understand the difficulty of crafting a framework that balances divergent economic, social, cultural, and regional interests. However, the final Environmental Impact Statement must be balanced and flexible enough to accommodate the diverse needs of rural communities and Tribes.

In addition to the Forest Service's demonstrated commitment to soliciting stakeholder feedback through local engagement, RVCC greatly appreciates the inclusion of adaptive strategies in the DEIS to accommodate the cultural and ecological differences across our national forests. We urge the Forest Service to continue to promote collaborative solutions to managing these forests and conserving these precious resources.

While we appreciate the fact that the DEIS will lead to increased protections for old growth forests across the National Forest System, we ask the Forest Service to consider requiring or incentivizing more regular updates to forest plans, many of which are outdated. This would not only lead to more efficient management of our national forests, but also present an opportunity for increased collaboration and engagement with community impacted

communities.

We sincerely appreciate the Forest Service addressing the challenges posed by existing infrastructure and timber processors in its mature and old-growth threat analysis. As sawmills across the west continue to shutter, communities are struggling to process timber. Not only does this create problems in meeting the demand for wood products, but also exacerbates the threat of catastrophic wildfire. Sufficient mill capacity is critical to address the threats facing mature and old-growth forests, particularly for rural communities.

Thank you again for your tireless work and dedication. RVCC is looking forward to supporting the implementation of this important amendment.

Sincerely,

Laurel Harkness, Coalition Director

Rural Voices for Conservation Coalition

ATTACHMENT: RVCC_NOGA.pdf - this is the same content that is coded in text box; it was also included as an attachment