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Comments: Dear Ms. Linda Walker,

These are my scoping comments on the Forest Service's notice of intent to prepare an environmental impact statement to analyze the development and implementation of a nationwide forest plan amendment to conserve old growth forests. Forest Service, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Notice of Intent to Prepare an Environmental Impact Statement, 88 Fed. Reg. 88,042 (Dec. 20, 2023).(EIS)

I am a long-standing member of Whatcom County's Wildlife Advisory Board and a member of the county's Forest Resilience Task Force. We have only a few remnants of old growth forest that are crucial for unique, endangered species such as Northern Spotted Owl and Marbled Murrelet. We are actively researching how to create more sustainable and biodiverse mature forest habitat including protecting and enhancing natural support systems such as mycorrhizal networks.

I strongly support a consistent, strong federal policy that protects all old-growth forests and trees and significantly increases their abundance and distribution across the nation.

Mature and old-growth forests are a nature-based climate solution for storing large amounts of carbon, supporting biological diversity, and enhancing climate resilience. Mature forests provide many of the ecological roles as fully functional old growth forests. Over time, mature forests will recover depleted areas. The proposed amendment must set clear benchmarks for the occurrence, arrangement, and connectivity of mature and old-growth forest conditions across the landscape for ecological integrity. This connectivity is critical to many species to provide a protective corridor or at least a string of "forested islands".

In evaluating options, the EIS must consider alternatives that significantly strengthen old-growth forest protections by limiting the stated exceptions to protections. For example, older forests in wet areas like the Tongass where fire is infrequent should be retained for biodiversity and climate values. In addition, existing old-growth definitions need review and ground-truthing to ensure they are consistent with best available scientific information, inclusive of all old forest conditions, and practical for consistent application in the field. Some of our region's mature forests contain that last vestiges of fungi populations that provide medical compounds unlike anything else manmade or natural such as Lion's mane, Chagga mushrooms, etc.

The national forest plan amendment must also incorporate strong monitoring and accountability measures, both for tracking the abundance and distribution of mature and old-growth forests, and for ensuring their value as a natural carbon solution is optimized over time. It is vital that you establish the strongest possible safeguards for mature and old growth forests to ensure they continue to capture and store carbon, sustain plants and animals, and provide clean air and water for generation to come!

Thanks for your consideration.