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Organization: Spokane Mountaineers

Title: Conservation Chair

Comments: Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

On behalf of the Spokane Mountaineers Conservation Committee, we join millions of Americans who are deeply invested in the conservation of mature and old-growth forests on all national lands. The escalating threats of biodiversity loss and the impacts of climate change necessitate solutions of equal magnitude. We believe transformational change is crucial and advocate for actions that go beyond maintaining the status quo or taking incremental steps. A nationwide forest plan amendment, effectively executed, can play a significant role in addressing these environmental challenges.

We urge a thorough analysis in the Environmental Impact Statement (EIS) for alternatives that offer stronger protections for old-growth forests. The current amendment language, which allows for commercial logging of old-growth under numerous exceptions, is concerning. We advocate for the Forest Service to significantly reduce, if not entirely eliminate, the felling of old-growth trees and logging in old-growth stands, particularly in areas less affected by fire. Moreover, it is crucial to eliminate any commercial exchange of old-growth trees to uphold the integrity and goals of the amendment.

The amendment should avoid restrictive definitions that could artificially limit the protection of old-growth forests. A broader, inclusive definition, simple and practical for field application, is essential to encompass all old-growth conditions effectively.

Recognizing the importance of expanding old-growth forests, we suggest that the EIS process consider alternatives to preserve the values of mature forests as future old-growth. This is especially vital in regions where historical logging has left little old-growth. While managing other threats like wildfires is necessary, the risk posed by ecologically inappropriate logging, which is within the direct control of the USFS, must be addressed.

The national forest plan amendment should also include robust monitoring and accountability mechanisms. These are essential for tracking the distribution and abundance of mature and old-growth forests and ensuring their role as natural carbon sinks is maximized over time. Additionally, it is crucial to bridge the nature gap by ensuring that frontline and nature-deprived communities benefit from these amendments. This could include developing an "equity layer" for the USFS Climate Risk Viewer, showcasing these benefits across various landscapes and communities.

We thank you for this opportunity to contribute our thoughts on this initiative. The preservation of mature and old-growth trees and forests is critical in combating the climate and biodiversity crises. We encourage the Forest Service to adhere to its timeline for this amendment process and to engage with Tribal Nations, the public, and other stakeholders.

Sincerely,

Nicole White & Brannen Morris

Conservation Committee Chairs

Spokane Mountaineers