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Organization:

Title:

Comments: Dear Ecosystem Management Coordination Director,

I'm writing to provide 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 ("Elder") forests #65356: 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).

I support the comments provided for the NFP amendment by the L.I.G.H.T. Foundation, an Indigenous-led native plant and pollinator conservation 501(c)(3) nonprofit organization. These comments recommend that the USFS should:

1. Incentivize Indigenous-led management goals, priorities, and strategies of conservation and stewardship informed and sustained by Indigenous Knowledges (IK) in non-extractive and ethically responsible ways.
2. Incentivize Indigenous-led leadership to establish habitat connectivity standards and guidelines which prioritize native plants of Indigenous food systems. This will support native pollinator species and wildlife movement to adapt to changing climate and habitat conditions, including establishing road density standards and other measures, especially proximate to crossing structures or other identified connectivity pathways. Safeguard and secure the retention and intergenerational transmission of ancestral languages and IK, prioritizing and incentivizing Indigenous leadership in cultural burning and habitat restoration at scale and frequency to restore ecologically characteristic fire activity in fire-prone areas.
3. Safeguard and secure the free exercise of IP's right to exist, practice their cultural traditions, and access their territories unencumbered by harm or threats of harm; prioritizing Indigenous access to hunting, fishing and gathering on National Forests.
4. Implement a consistent federal policy that protects Elder forests and trees while also significantly increasing their abundance and distribution across the nation. Protect Elder stands in moist forests and protect Elder stands in seasonally dry forests by limiting the stated exceptions to protections. Elder stands and trees are inordinately important for storing carbon, supporting biological diversity, and resisting stress from fire, drought, and other disturbances. Additionally, Elder stands will provide important seed sources genetically attuned to local conditions and robust at adapting to changing conditions over time.
5. Implement a nationwide review of terminology for "old-growth" and "mature forests" to ensure that every federal agency responsible for forest ecosystem management is using the best available scientific information (including integrating IK), is inclusive of all Elder forest conditions, and is practical for consistent field application.
6. Eliminate intensive logging of Elder forests, which results with a large net loss of forest carbon storage, and may degrade the forest ecosystem's ability to provide natural protections against extreme weather events and eradicate local seed sources. To effectively mitigate climate change, large federal land managers could increase forest protection from all logging operations to avoid carbon emission release and absorb large amounts of carbon from the atmosphere to preserve in biologically diverse landscapes.
7. Implement a ground-truthing inventory and robust monitoring and accountability field study to track the abundance and distribution of Elder forests, corresponding native plant and fungi communities, and soil

conditions to establish baseline and evaluation data for natural carbon storage, air, and water filtration.

8. Maintain and improve protections for at-risk native pollinators, plants, fish, and wildlife species by ensuring that the LMP EIS sustains the ecological integrity of National Forests and identifies and implements approaches to address Western science knowledge and information gaps and integrate IK methodologies in ways which safeguard and secure IK through development of Indigenous Data Sovereignty Agreements (ISDA) and implementing Principles for Indigenous Governance.

Thank you for the opportunity to provide feedback on this historic Elder stand conservation proposal. It is vital that America establishes the strongest possible safeguards for Elder forests to ensure they continue to capture and store carbon, sustain biodiverse plant and animal species, and provide clean air and water for all life. I encourage the Forest Service to maintain its timeline for this amendment process, and robustly work government-to-government with Tribal Nations as rights holders, and engage important stakeholders like the public.

limlmt & qeciye'w' (thank you),
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Citizen of the Colville Indian Reservation