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March 16, 2025

ATTN: USDA Forest Service

**Re:** The Northwest Forest Plan Amendment Draft Environmental Impact Statement (Project #647745) – Forest Bridges’ Response

Dear USDA Forest Service (Forest Service):

On behalf of the Board of Directors of Forest Bridges: The O&C Forest Habitat Project, Inc.), we are honored to submit Forest Bridges’ formal response to the Northwest Forest Plan Amendment/Draft Environmental Impact Statement call for public response. Forest Bridges is an Oregon-based 501(c)(3) non-profit collaborative organization that brings together people of diverse viewpoints – e.g., conservation, forest industry, recreation, Tribes, government, etc. -- to foster sustainable forest health and habitats through active management and restoration solutions focused on the 2.9 million acres of Western Oregon’s O&C Lands.

It will be recalled that on February 2, 2024, in response to the public scoping of the NWFP Amendment EIS, Forest Bridges submitted substantive comments to the agency in the form of an **“An Active Conservation Management Proposal for the Moist, Dry, and Transitional Forests specifically on the Forest Service Controverted Oregon & California (O&C) lands of western Oregon.”**

Now, in response to the Forest Service’s NWFP DEIS, we add to that first contribution a set of legislative concepts entitled: **“Forest Bridges’ Western Oregon O&C Lands Legislative Concepts: Proposed Elements of an O&C Lands Forest Sustainability Act of 2025.”** Grounded in cutting-edge western science (e.g., ecological silviculture, fire ecology) and Indigenous Knowledge, they present a collaboratively developed, paradigm-shifting active management forest ecosystem management model for improving forest health and fire resilience on the O&C Lands. They also address a range of management barriers and promote the need for robust Tribal co-management opportunities. The fundamental shift is to replace fixed location reserves with an all-lands management approach that sets strict specifications for habitat diversity goals, including strong standards for legacy habitat and structurally complex old

growth habitat. This is accomplished through the use of metered harvest strategies, tailored to dry, moist and transitional forests.

Reflecting on how best to respond to the NWFP DEIS, Forest Bridges realized that to do so as the Forest Service advises would draw us into an inherently constrictive framework. While Alternatives B and D speak to many of our Active Conservation Management principles and proposals for dry, moist and mixed dry-moist (or A.K.A Transitional) forests, the following key limitations present us with a technical and ethical dilemma:

- land allocations that remain unchanged, leaving tens of thousands of acres of overly dense forests in Wild and Scenic River areas, for example, at great risk for high severity wildfire;
- thinning and harvest strategies focused on tree age thresholds instead of ecological, forest health needs, and
- 100- to 200-year habitat restoration timelines in dry, moist and transitional forests that could easily be outpaced and out-impacted -- *in terms of forest acres lost* – by the growing instance and magnitude of high-severity wildfire.

Our ardent desire is for the NWFP Plan Amendment process, and related National Forest planning, to set up the Forest Service, Tribal and other partners and surrounding communities for great success at a time when we need durable solutions not short-term fixes or failures. We can no longer face these unacceptable conditions: growing high-severity wildfires, disease, and loss of habitat and species on our public lands; wildfire smoke at hazardous levels for months on end each year; and declining forest-based rural economies and forest industry. We share our legislative concepts with you to demonstrate our commitment and need to move beyond the limits of planning to endeavor to shift the management paradigm on the O&C Lands, including those the Forest Service managed, through changes in law. We believe our concepts have wide applicability: to serve as real solutions on forests beyond the O&C Lands, extending to all forests in the NWFP Area.

For more information, we invite you to our website: <https://www.forestbridges.org>. It is our sincere hope that the Forest Service will review our two substantive comment submissions to the NWFP Update and consider our Active Conservation Management model as a sound ecologically-based strategy for active forest habitat management.

Sincerely yours,

**Thomas McGregor**

**Denise A. Barrett**

Thomas McGregor  
Board Chair

Denise A. Barrett  
Executive Director

cc: Forest Bridges Board of Directors, Council of Advisors and Tribal partners