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Title:

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

To Linda Walker, Director, Ecosystem Management Coordination,

Vibrant Planet welcomes the opportunity to comment on the proposed Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System. As a company harnessing data-driven science and cloud-based technology to help make communities and ecosystems more resilient in the face of climate change, we strongly support the amendment's ambitious goals to conserve and steward these ecologically irreplaceable ecosystems. We advocate for the use of a systematic, science-based approach to implementing this amendment. A plan at this scale calls for a strategy that can provide both national consistency and cohesion, while still allowing for local nuances. As climate change rapidly alters mature and old-growth forest conditions, timely action is imperative. As such, we recommend leveraging and innovating on established methodology so as to expedite implementation without compromising scientific validation. Our recommendations for five key objectives listed in the amendment are as follows:

1. Establish a National Old-Growth Monitoring Network

Recommendation: Innovate on established frameworks that employ current, 3-dimensional earth observation data sets like Lidar and/or synthetic Lidar to empirically and specifically monitor all existing dominant trees in old-growth stands to effectively quantify health and loss while measuring the succession of mid- and late-seral stands into old-growth.

2. Facilitate geographically informed adaptive strategies for old-growth forest conservation

Recommendation: Apply an approach that builds adaptive, place-based management recommendations from a consistent nation-wide framework

3. Enable co-stewardship with all stakeholders, incorporating local and indigenous knowledge

Recommendation: Use a collaborative, consensus-building tool that provides all stakeholders access to the best available data and analytics for planning and locally contextualizing data and insights

4. Conserve old-growth forest conditions by improving durability, resilience, and resistance to wildfire, insects, and disease

Recommendation: Incorporate robust models of response to disturbance with state-of-the-art hazard models for 21st century challenges like wildfire, drought, insect, and disease that inform adaptive management strategies

5. Strengthen the capacity of existing and future old-growth forest conditions to adapt to the ongoing effects of climate change

Recommendation: Perform analyses of treatment effectiveness and trends over time to ensure the goals of this amendment are achieved

Recommendation: Include an ensemble of climate-based disturbance models, ensuring plans are responsive to

our changing environment

Vibrant Planet strongly encourages the adoption of scalable, all lands, data-driven, and adaptable approaches that exist today to ensure mature and old-growth forest conditions are successfully sustained and expanded.

Sincerely

ATTACHMENT: Old-Growth_Comment_VibrantPlanet.pdf is letter content.