

Data Submitted (UTC 11): 1/30/2024 4:53:37 PM

First name: Lloyd

Last name: Vivola

Organization:

Title:

Comments: Thank you for receiving comments regarding amending the Land Management Direction for Old-Growth Forest Conditions in the National Forest System.

As someone who has long enjoyed our national forest lands as a recreational nature-lover and as a wildlife survey tracker in programs that partner with the USFS and Oregon Department of Fish and Wildlife, I greatly appreciate the biodiversity and many resources that national forests provide for our communities. Confronted with the unpredictable impact of climate change, I am also aware of the role that our old growth forests must play in assuring the good health and sustainability of those communities.

Accordingly, I support a Land Management Plan amendment that substantially invigorates the region's mature and old growth forests by 1) maintaining protections for already established Late-Successional Reserves, 2) expanding the range of those LSRs wherever possible, 3) enhancing connectivity of already established LSRs, and 4) creating new LSRs wherever possible.

Mature and old-growth forests must play an instrumental role as carbon sinks well into the future. Increasing the size and enhancing connectivity of LSRs will also prove beneficial to wildlife adaptability and biodiversity as species - endangered species among them - respond to the yet unforeseeable challenges of climate disruption.

In a similar fashion and regarding climate change, I urge that any Land Management Plan amendment address the role of "active management" in greater detail and with greater emphasis on potential challenges that may lie ahead for all our federal forests. Old growth management must look beyond assessing value only by metrics of timber harvest.

Accordingly, as an alternative to thinning, fuel treatment, and mastication, I support a Land Management Plan that recommends and articulates the application of science-based prescribed fires wherever possible, along with a concerted effort to include indigenous knowledge in Forest Service assessments and actions, not least of all by welcoming greater partnership with the tribal communities who look upon federal forest land as a part of their traditional homeland and resilient indigenous ecology.

Respectfully,
Lloyd Vivola