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Comments: The Portland Water Bureau (PWB) supports the USDA's proposal to develop a nationally consistent conservation and stewardship plan for old-growth forests. The PWB is a public drinking water utility that relies on the mature and old growth forests of the Bull Run Watershed located on Mt. Hood National Forest for the primary drinking water supply of nearly 1 million Oregonians. Due to foresight by elected officials, staff, and engaged citizens, Bull Run forests are protected within a 147-square mile federally designated management unit set aside for the primary purpose of water supply. A majority of the watershed's forests are old growth.

Bull Run forests provide a significant benefit by sustaining a clean and abundant water supply for our region, as well as supporting biodiversity, storing carbon and mitigating wildfire risk. Bull Run forests stand to benefit from improving the resiliency and health of adjacent national forest lands as fire, insects and disease can easily spread across administrative boundaries.

The PWB appreciates that the USDA plans to develop geographically informed adaptive implementation strategies to mitigate the threat of wildfire to old growth forests. For instance, fire regimes in the moist old-growth forests, like the Bull Run, are very different than those in dry forests so would not benefit from fuels treatment that would be appropriate in overgrown dry forests impacted by fire suppression.

We appreciate the opportunity to comment and look forward to tracking the old growth amendment.