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Organization:

Title:

Comments: Dear US Forest Service,

I endorse the comments submitted on 9/16/2024 by Forest Bridges: The O&C Forest Habitat Project, entitled, The Merits of--and Reconsiderations for--Preferred Alternative B in the Old Growth Amendment Draft EIS, as informed by Forest Bridges' work on the O&C Lands of western Oregon.

The O&C Forest Habitat Project has provided to the US Forest Service an in-depth analysis of the draft EIS for the Old Growth Amendment, with special emphasis on highlighting the merits of Alternative 2, the Forest Services' preferred alternative, while also providing several recommendations to help strengthen it to better meet the purposes of conserving, stewarding, recruiting and monitoring old-growth forests in National Forests.

In conducting its analysis and developing its recommendations, Forest Bridges applied, and shared in some detail, its collaboratively developed, Western and Indigenous science-based Active Conservation Management framework for the O&C Lands of western Oregon. These lands include 500,000 acres managed by the Forest Service (in six national forests) and 2.4 million acres managed by the Bureau of Land Management. The organization also provided some broader ideas applicable on a national scale.

In its comments, Forest Bridges provided numerous examples of how the organization's "Active Conservation Management" framework aligns with the Forest Service's "proactive stewardship" aims and approaches for managing old-growth, including

- § promoting ecologically focused, adaptive management that treats as many vulnerable acres as possible to confer climate change and fire resilience (i.e., addressing the highest contemporary threats to old-growth forests: severe wildfire, followed by insects and disease);

- § establishing roles for Indigenous Knowledge and tribal leadership in the proactive stewardship of these important ecosystems; and

- § applying a range of treatment tools--prescribed fire, timber harvest, hazardous fuels reduction via thinning, wildlife habitat improvement, and other vegetation management that aligns with restoration and resilience objectives.

Despite these alignments and the organization's enthusiasm for this proposed shift from passive, reserved-based conservation to an approach similar to its engaged, Active Conservation Management model, Forest Bridges identified and called out several key concerns regarding Alternative 2 and offered informed recommendations, which included:

- § expand the dimensions of "proactive stewardship" in promoting the composition, structure, pattern and ecological processes necessary for resilient old growth by including the goal of restoring stands to precolonial fire-resistant stand densities, composition, and structure;

- § include a provision for ALL stands in a National Forest, including old-growth stands reclassified following disturbance, to be managed for their legacies, as they have the potential to become old-growth over time and may be old-growth forests of the future;

- § at the same time old-growth is being recruited and sustained, include a provision for the development of all other seral stages--at an appropriate level and distribution;

- § consider adopting Forest Bridges' process for prescribed fire and snags in checkerboard land ownerships, like the O&C Lands--i.e. pile and broadcast burning following mechanical thinning that mitigates fire escape from public lands to adjacent private or other lands, as well as retains snags in a manner that simultaneously supports ecological objectives (e.g., for wildlife habitat creation) and safety objectives (e.g., for firefighting);

- § consider adopting Forest Bridges' Burned Forest Restoration Strategies specific to dry and moist forests;

- § consider applying both the five critical resilience recommendations in Braiding Indigenous and Western Knowledge for Climate-Adapted Forests (2024) and the Tribal Forum's relevant themes;

§ in view of the legal and regulatory barriers that prevent restoration in reserves, roadless areas and the WUI: include in the Alternative 2 Framework the need for modifying laws and regulations to increase the use of thinning and prescribed fire tools for forest restoration and the need to update reserve models to include proactive stewardship in conservation strategies;

As with any paradigm shift to 21st century forest management, Forest Bridges advised that carrying out the explicit purposes of the policy changes proposed in the Old Growth Amendment will also require funding for Active Conservation Management treatments at a level needed to accelerate restoration and sustainability of old-growth and other seral stages in National Forests, in line with the ecosystem services these forests provide. Forest Bridges believes that the most successful conservation outcomes, at least in the Pacific Northwest, arise from active restoration, maintenance and co-management with Tribal partners to steward natural and cultural resources, using Active Conservation Management approaches specific to forest types.

Thank you for taking the time to read Forest Bridges' comments, which I endorse.