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Comments: Forest Bridges: The O&C Forest Habitat Project, Inc. (FB) is honored to have this opportunity to present

information in response to your RFI.

History of Forest Bridges

Forest Bridges was initiated in 2015 by three founders representing deep roots in conservation and timber perspectives, who envisioned building a collaborative organization that could bridge multiple interests including conservation, recreation, the forest industry, counties, tribes, the public and others, with an evidence-based, collaborative approach to holistic, light touch 21st century forest management with a focus on the O&C forest lands in western Oregon. In 2018 Forest Bridges became a 501(c)(3) non-profit public charity and continued to grow its voluntary collaborative. The foundation of these efforts is a series of proposals, known as the Forest Bridges Principles of Agreement, from which other management proposals and writings flow.

The current version of these Agreements can be found at the end of this document.

By late 2021, the FB Board and contracted staff had raised sufficient funds from several foundations, individuals and businesses, a tribe and two counties, to hire its first full-time paid executive director, who is now charged with taking the FB to the next level of its development: 1) expanding into the public realm to share, and consider modifications to the collaborative's Principles of Agreement based on public feedback, and 2) building our base of support, known as the Friends of Forest Bridges.

Inventorizing the Whole Forest System and Sharing It with the Public is Preferable to Only Inventorizing Old

Growth and Mature Forests

What follows are the collaborative recommendations from our diverse Board of Directors, representing a range of different viewpoints.

Forest Bridges supports the inventory of Old Growth and Mature Forests to the extent that up-to-date inventory is missing. However, if inventory information is already in the possession of the agencies, such as post Labor-Day fires in western Oregon, it is our hope that inventory itself will not be duplicated, because it stresses significantly understaffed agency field operations and diverts funding and attention away from other worthwhile projects and programs that make improvements on the land for habitat restoration, sustainability and fire resistance.

From Forest Bridges' perspective, making various layers of the complete lands inventory public, would be a useful public service, with one major caveat. We believe that, at least with respect to the O&C lands of Western Oregon, ALL age classes and areas of the forest should be included in the inventory that is made public. Such a holistic systems approach is important to us, because it sends the message that the condition of all stands, young and old, play critical roles in habitat and fire risks, which affect the sustainability of these forests in an era of climate change. It puts the focus on the extent and quality of the habitats and, for the public, presents an important first inventory picture of the forests.

Furthermore, a whole forest inventory approach makes defining the terms, old growth and mature, less important. These terms vary significantly, even from one part of western Oregon to another. As a result of this variability,

these definitions have proven to be elusive, mired in controversy and misunderstandings for decades. We believe that all stands should be characterized by age class, at least with respect to the O&C lands, which makes the definitions of old growth and mature stands unnecessary.

Forest Bridges is very concerned that we retain and build fire resistant, structurally complex forests, as well as other forest seral stages, that are capable of supporting a diversity of endemic species, reproducing successfully. At the same time, sustained yield and sustainability requires active harvest management and prescribed burning to continually renew habitats and reduce combustible fuel densities in many portions of these forests, regardless of age.

Forest Systems are Dynamic not Static and Need a Holistic Conservation Approach to Addressing Climate

Change Risks

Forest Bridges envisions maintaining the health and sustainability of the whole of O&C forests of Western Oregon -- all ages and forest types, not simply the older stands. As a dynamic, perpetually changing system, all of the parts are important. While portions of the forest are sustained much longer than others, no part of the forest is forever. These forests co-evolved with fire, and at some point in time they will be replaced. Our management should minimize wildfire, as well as the very real issue of reburns - repeated fires in the same area. Reburns are also very destructive of soils, containing the below-ground forest.

As for the current public focus on old growth and mature forests, we think the agencies run the risk of getting their prescriptions wrong if they focus on limited elements of the forest, such as old growth and mature. Any work in publicizing inventory should address all age and ecological classes and could benefit even further from map layers showing fuels inventory, lightning strike frequency, and some measures of climate gradient, such as temperature and precipitation - all of which impact prescriptions, habitat characteristics and vulnerability to loss from wildfire.

Forest Bridges believes in accelerated active management in areas where the forest is dense beyond historical levels due to fire exclusion practices, which have been guided by public forest policy since 1908. In the absence of accelerated active management, when these forests burn even the largest trees are likely to be lost. In the local Archie Creek fire of the Umpqua Basin in 2020, whole watersheds, such as Rock Creek, were devastated. The whole forest, from seedlings to the oldest trees, four- to five-hundred-year-old and many feet thick, were consumed along with many private homes and other structures in the checkerboard. Not even the oldest trees had thick enough bark to withstand the heat from the burning fuels.

While we are strong proponents of prescribed fire as a tool in accelerated active management, along with the necessary funding, we continue to believe that fire exclusion is appropriate policy for fighting wildfire on O&C lands in the checkerboard ownership. In the checkerboard, adjacent landowners face the potential for significant loss. Therefore, alignment with the state and private forest protective associations, such as the Oregon Department of Forestry, or Douglas or Coos Forest Protective Associations, is appropriate for the O&C lands. We need to address and focus on fuels reduction, regardless of stand age or land classification within the O&C lands. Dangerously excessive fuel levels are the problem. Fire in young stands could just as easily move into old stands resulting in their loss. When fire is driven by wind into old stands, the fuel on the ground preheats the crowns of the old trees, making them very susceptible to total live tree destruction.

Fundamentally—Forest Bridges believes the best way to conserve older, structurally complex Douglas-fir forests is to recognize the dynamic nature of plant communities over time, as well as the need for younger cohort management to eventually replace large trees. This is founded on the principle of weighing short-term impacts versus long-term benefits. In this way, the entire landscape of the O&C lands, regardless of prior subclassifications, can be managed to achieve the desired distribution of forest stages and age classes so that

the rate of developing structurally complex forests meets or exceeds the rate of loss. In the dry forest we envision a reduction of stand density to levels that preclude virtually all severe fires, while in the moist forest, we envision 50% composition of the landscape as an adequate target for structurally complex forest.

To more successfully manage for desired age class distribution across the landscape, we believe that all forest stages should have been inventoried (but no need to duplicate up-to-date inventories) and available for public viewing because all stands and communities play critical roles within the forest continuum—not just iconic old growth forest. Moreover, a focus on preserving only one "element" of the forest continuum (i.e., setting old growth forest aside from human influence) is a colonial artifact that will result in their erasure over the midterm arc of climate change and our new reality of megafires.

SEE LETTER SUBMISSION: Figure 1: Old Growth forest structure in the moist forest Coast Range ecoregion has occupied about 50% of the moist forest landscape for almost 3,000 years (Spies et al. 2009). As such, Forest Bridges seeks to emulate this stand distribution over time through active management.

Forest Bridges' work represents a management proposal, and we also recommend substantial financial support for monitoring and adaptive management, within a planning cycle, to adapt not only to changing conditions, but to our increased knowledge of management.

It's Time

Become a Friend of Forest Bridges

Principles and Governing Concepts supported by Forest Bridges Friends

Updated Nov 20, 2019

Forest Bridges proposes a habitat-based, well-funded program of very long-term, slow-active and light touch management across the landscape of the O&C BLM Forest Lands of Western Oregon, based on the following:

1. The present condition of much O&C land differs greatly from natural conditions due to fire exclusion and past forestry activities (and inactivity). There is a shortage of structurally complex forest, natural pre-forest, standing dead trees, and other habitats. The present distribution of stand age classes is not natural within the historic range of variability.
2. Our challenge is to describe an approach to active, long-term management of the O&C Lands that is constructive and viewed as fair from all points of view; timber production, county revenue needs and the ecological and other non-material values of the community at large.
3. Short term risks must be weighed against the potential for consequent long-term gains.
4. The BLM lands must provide the full range of habitats for the historically native species.
5. The historic natural role of fire will not be allowed on O&C lands due to the unique checkerboard pattern of ownership and the fire exclusion policy of neighboring landowners. Active management must replace the role of fire to perpetuate ecosystem integrity.
6. BLM management must adapt and mitigate for climate change.
7. An effective forest management plan for the O&C lands should begin with long range landscape visions

for the moist and dry forests, following the principles of comprehensive ecosystem management.

8. Dry Forests: Due to past fire suppression, ineffective forest management, and future climate change, the dry forest needs immediate density and fuels management including the reintroduction of prescribed fire.

9. Moist Forests: A process to regularly create the pre-forest condition is needed in moist forests to sustain a range of habitats and ecosystem functions.

10. The science of managing for structural complexity in moist forests is rapidly advancing and monitoring will help increase our understanding. We believe active management can speed restoration, support natural processes of development, and help us understand them.

11. Current herbicide practices and intensive reforestation on non-federal lands preclude natural early seral stages of habitat development for certain pre-forest species.

12. The O&C Act specifies that these lands shall be managed for permanent forest production in conformity with the principle of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries.

13. Sustained yield forestry means sustainable forest management which perpetuates dynamic ecosystem integrity and a full range of wildlife habitats while continuing to provide wood and non-wood values. Managing the diverse range of habitats is a sound basis for a sustained yield forest plan.

14. The O&C lands are governed by NEPA, the ESA, the Clean Water Act, FLPMA, the O&C Act, and other federal legislation.

15. The O&C lands remain in Federal ownership, managed by the BLM.

16. Achieving optimal watershed health requires management across whole watersheds but this project focuses only on the Western Oregon BLM land portion as an achievable step forward.

17. The extensive valley bottom road system in these lands impedes watershed health and should be fixed while right of way road access continues.

18. Historical natural range of variability of stream channel conditions should be ensured.

19. Neighboring forest landowners should be incentivized to restore their portions of watersheds beyond state requirements.

20. Adaptive management is critical to successful long-term management.

21. Adaptive management means applying the best science to management actions; monitoring what was done and assessing the changes over time; then comparing the results with predicted expectations. Future plans and actions are modified, based on the comparison of expectations and results.

22. Historically, adequate monitoring has not happened. Dedicated and sufficient monitoring funds must be provided permanently to support adaptive management.

23. Future adaptive management must be responsible for restoring and protecting these watersheds.

24. 50% of revenues from O&C harvests are distributed to the O&C counties. The remaining 50% of O&C Harvest revenues are proposed to fund ongoing monitoring, legacy restoration, and adaptive management on BLM lands, as well as restoration incentives on adjacent non-BLM land.

25. Implementation of management activities will require a timely path through the legal system. Legal consistency standards among laws, plans, and proposed actions shall allow both legal challenge and a streamlined resolution process for timely implementation.

26. Forest Bridges shall implement Diversity, Equity and Inclusion policies throughout its work.