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Submitted to: <https://www.fs.usda.gov/project/?project=57302> under “Comment/Object on Project”

Matthew Anderson, Supervisor
Attn: Forest Plan Amendment
Bitterroot National Forest
1801 North First Street
Hamilton, MT 59840

Mr. Anderson:

This letter is comments from Friends of the Clearwater (FOC) on your July 13, 2022 Forest Plan Amendment Proposal (AP). FOC’s mission includes protecting the ecosystems of the Wild Clearwater Country and the Big Wild. The Bitterroot National Forest (BNF) lies at the eastern extent of the Big Wild.

The AP states Supervisor Anderson has determined there is a need to amend 1987 Forest Plan components for old growth, coarse woody debris, and snags. The AP invites feedback on the proposed changes (forest plan amendment) including identification of relevant scientific information and potential issues for the interdisciplinary team to consider.

The Forest Supervisor also states, “I have the discretion to determine the scope and scale of any amendment and am not required to apply any substantive requirements that are not directly related to the amendment.” Based upon the content of the AP, the supervisor apparently believes there is no questioning his authority for setting the scope of this proposal to be as narrow as he wants it, regardless of how illogical it appears. So the Forest Service (FS) is ignoring the § 219.8(a) requirement to “include plan components ...to maintain or restore structure, function, composition, and connectivity, taking into account: (i) Interdependence of terrestrial and aquatic ecosystems in the plan area. (ii) Contributions of the plan area to ecological conditions within the broader landscape influenced by the plan area. (iii) Conditions in the broader landscape that may influence the sustainability of resources and ecosystems within the plan area. (iv) System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change” even though the science of old growth invokes all of those concepts! Similarly for the § 219.10(a) requirements to “provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed,

wildlife, and fish, within Forest Service authority and the inherent capability of the plan area...” He also ignores § 219.12 Monitoring (a)(1): “The responsible official shall develop a monitoring program for the plan area and include it in the plan. Monitoring information should enable the responsible official to determine if a change in plan components or other plan content that guide management of resources on the plan area may be needed.” An old-growth inventory is highly relevant for monitoring.

The AP inexplicably fails to explain or disclose that the Bitterroot National Forest (BNF) has already proposed and utilized “project-specific” forest plan amendments in dealing with these same issues (old growth, coarse woody debris, and snags) for well over a decade now, and doesn’t explain what has changed so the FS now wants to address these issues with a “programmatic” amendment. Further, the AP doesn’t explain or disclose that there are at least three large timber sales for which final decisions are pending, which would rely on project-specific forest plan amendments on these same issues as well as for elk habitat.

The AP also neglects to mention the fact that sixteen years ago, in the context of programmatic forest plan revision the BNF released a Draft Forest Plan for public comment. It appears that the FS has continually failed to act on its previously claimed need for programmatic revision once public comment period ended, preferring instead to implement legally questionable piecemeal “project-specific” amendments.

Clearly, with the current Forest Plan being about 35 years old and with its inherently out-of-date Environmental Impact Statement (EIS), the FS’s priorities ought to be finishing the revision of the BNF Forest Plan before approving large-scale projects that tier to flawed documents and analyses.

If the FS chooses to pursue its proposal for plan amendments instead of revision, we believe the agency ought to be preparing an EIS. However these comments are written under the assumption the FS will move forward with an Environmental Assessment (EA) process. We note that in actuality nothing in regulation states the FS **must** perform cursory analyses in EAs even though they generally do.

The 2006 Draft Forest Plan included the following definition for Old Growth: “This is defined by *Old Growth Types of the Northern Region* (Green et al. 1992, errata corrected 02/05). Tables and descriptions for western Montana are quantified by an identified habitat type, tree size, tree age, trees per acre, and basal area per acre.” So it appears the FS has been implementing part of some version of a revised forest plan without actually completing the required public process.

The EA must analyze and disclose the cumulative effects of implementing project-specific forest plan amendments on old growth, coarse woody debris, snags and elk habitat. The EA must also analyze and disclose the results of monitoring the effects of implementing all those previous projects which included such project-specific amendments.

The EA must disclose which 1987 plan EIS analyses are no longer supported by best available science. The EA must also identify which scientific references that 1987 EIS cites are contradicted or superseded by newer science, and cite and disclose the newer scientific sources.

The EA must analyze and disclose current consistency (including amounts in the relevant Management Areas) with all 1987 Forest Plan standards, including those for the MAs implicated in this AP.

The EA must analyze and disclose population trends of mature and old-growth MIS.

During the July 22 field trip hosted by the FS on the Bitterroot Front proposal, the discussion of old growth and amending the Forest Plan definition was on the agenda. Agency specialists made statements similar to those in the AP alleging problems with the 1987 Forest Plan definition of old growth, and promoting the Green et al. definition as mentioned in the Amendment Proposal. During that field trip the FS also claimed that much more of the BNF would meet the Green et al. definitions that would meet the current 1987 Forest Plan definition, and some numbers were even tossed around. The EA must show how much of the BNF currently meets the Green et al. definitions and how much currently meets the 1987 Forest Plan definition.

The 2006 Draft Forest Plan states, “Old growth habitat occupies approximately 12 percent of forested acres, excluding recently burned areas.” Please disclose the data source from which the 2006 Draft Forest Plan was basing this estimate.

The EA must analyze and disclose the direct, indirect and cumulative impacts of active management the FS would implement ***within old-growth stands*** and ***old-growth ecosystems*** under the proposed amendment.

The EA must analyze and disclose how the amended Forest Plan would assure population viability of forest plan Management Indicator Species (MIS) and other species relying upon old growth and mature forests for their life cycle needs.

President Biden’s April 22, 2022 Executive Order (E.O.) 14072 “calls on the Secretaries of Agriculture and the Interior, within one year, to define, identify, and complete an inventory of old-growth and mature forests on Federal lands, accounting for regional and ecological variations, as appropriate, and making the inventory publicly available.” Contradicting that E.O., Supervisor Anderson’s AP states: “Due to the dynamic nature of stand progression, a **forest-wide stand delineation of old growth will not be provided**. Old growth is not a static state; natural disturbances such as windstorms, wildfire, insects and diseases can move a stand from one successional stage to another” (emphasis added). The EA must explain how the proposed Forest Plan amendment “will also comport with Executive Order 14072 ... to define, identify, and complete an inventory of old-growth and mature forests on” the BNF, as Supervisor Anderson claims.

Supervisor Anderson’s AP also asserts the National Forest Inventory and Analysis (FIA) is “what is being used for the national inventory effort.” (He is referring to that same inventory, the one to follow from E.O.14072.) Regarding use of FIA data for inventorying old growth, there are significant methodological flaws, one of those being that the FIA data do not determine the size of any particular stand of mature or old-growth forest. Concerning the FIA, Bollenbacher et al., 2009 (a Forest Service Northern Region report) state: “All northern Idaho plots utilized a

primary sample unit composed of four fixed radius plots with trees ...21.0 inches DBH and larger tallied on **a ¼ acre plot**” (emphasis added). Also, Czaplewski, 2004 (another Northern Region report) states, “Each FIA sample location is currently a cluster of field sub-plots that collectively cover an area that is nominally **one acre in size**, and FIA measures a probability sub-sample of trees at each sub-plot within this cluster” (emphasis added). Clearly, with FIA sampling only small plots, the data would not inform an inventory conforming to an ecological definition of old growth. The Forest Plan EIS states:

Habitat diversity is a measure of the variety, distribution, and structure of plant communities as they progress through various vegetative stages. Each stage supports different wildlife communities. Wildlife management indicator species can be used as indicators of habitat diversity. The most critical element of diversity is old growth. **If sufficient old growth is retained, all other vegetative stages from grassland through mature forest will be represented in a managed forest.** Pine marten, **pileated woodpecker**, and elk are the **management indicator species** for mature forest, **old-growth forest**, and big-game habitat (Planning Record: Forest Plan Note No. 133).

(Emphases added.) Some forest plans for Northern Region national forests suggest or require a 300-acre stand be managed as old-growth habitat for the pileated woodpecker, a species needing very large snags and live trees with defect for excavation of nest cavities. FIA data do not reliably measure ecologically functioning old growth, so using it to complete inventories for meeting forest plan biological diversity goals would be inappropriate.

The Forest Service Chief’s 1989 letter to Regional Foresters “Position Statement on National Forest Old Growth Values” directed Regional Foresters:

Regions with support from Research shall continue to **develop forest type old growth definitions, conduct old growth inventories**, develop and implement silvicultural practices to maintain or establish desired old growth values, and explore the concept of ecosystem management on a landscape basis.

(Emphasis added.) Where is the BNF old-growth inventory the FS Chief directed the agency to complete back in 1989?

The proposed Forest Plan Amendment EA must consider how “old growth is valuable for a whole host of resource reasons such as habitat for certain animal and plants, for aesthetics, for spiritual reasons, for environmental protection, for research purposes, for production of unique resources such as very large trees” (quoting from the 1989 Forest Service Chief’s Position Statement on National Forest Old Growth Values).

The AP fails to place old-growth forests in the proper ecosystem and climate stabilizing contexts. Forest stands are components of old-growth ecosystems, so the complexity of ecosystems must be analyzed and disclosed in the EA. Juel, 2021 [in citing DeLuca (2009), Foster et al. (1996), Franklin and Spies (1991), Green et al. (1992), Hamilton (1993), Harris (1984), Harrison and Voller (1998), Kaufmann et al. (2007), Marcot et al. (1991), Noon (2009), Spies (2009), USDA

Forest Service (1987d), and Warren (1990)] discusses the issue of how natural disturbances and processes lead to the type of diversity naturally featured in old-growth ecosystems.

One value the 1989 Chief's Position Statement on National Forest Old Growth Values did *not* anticipate is forests' contributions toward a stable climate. Given the dire climate crisis in which we find ourselves, and in order to serve all other values, the EA must analyze and disclose the carbon sequestration potential of the landscapes and ecosystems within which old growth is found.

The FS must act on the need to highly prioritize immediate preservation of forest areas exhibiting high levels of stored carbon. To that end, we refer you to scientific papers being submitted by Dr. Dominick DellaSala of Wild Heritage in response to the July 15, 2022 Biden Administration Request For Information (RFI) in the Federal Register, seeking input on the development of a definition for old-growth and mature forests on Federal lands and requesting public input on a series of questions. The papers by Wild Heritage, Griffith University (Australia), Woodwell Climate Research Center (Massachusetts) plus scientists from the International Panel on Climate Change and are currently undergoing review. Our understanding is that their mapping methodology uses the latest processed LiDAR (2019) imagery on tree height, canopy cover, plus published ecosystem biomass datasets spatially derived to rank order the structural development of all conterminous U.S. forests from least developed ("young") to most developed ("mature/old growth"). The mapping is at 30-m pixels, and uses Forest Inventory and Analysis (FIA) plots for ***field validation*** of the rankings of remotely sensed areas. It is state-of-the art and science for defining mature/old growth spatially along with location, extent, ownership, protected status, amount of carbon sequestered, value for drinking water, and the imperiled species in the protected and unprotected mature forests. Mature/old growth in this context is the sum of their highest scorings for the three proxies relative to their surroundings: tree height + canopy cover + ecosystem biomass = mature/old growth forest which is then validated where researchers' polygons overlap FIA plots.

In other words, these scientists' data will be the best available science for achieving many of the mapping and inventory goals outlined in E.O. 14072, and will assist in the creation of a nationwide network of Strategic Carbon Reserves for responding to the Climate Emergency the Executive branch should have declared long ago. In dealing with this emergency, a first step would be to halt all logging in areas these scientists' research has identified as exhibiting high levels of stored carbon. It is glaringly obvious that implementing the proposed Forest Plan with management activities implied by the Amendment would result in less carbon stored in the BNF and more carbon emissions.

This Forest Plan Amendment process must result in publicly accessible maps of mature and old-growth forests on the BNF, so anyone can visit and enjoy these areas, and also so the inventory and mapping methodology can be validated on the ground by interested independent scientists, NGOs, and citizens.

Insofar as "identification of relevant scientific information" (AP), Juel (2021) discusses best available science regarding Green et al., which the AP proposes for use in defining old growth on the BNF. That paper also cites many other scientific references on the topic of old growth

relevant to this AP. Finally, for more scientific information relevant to old growth, snags, coarse woody debris, and wildlife, please see the discussions and cites found in the comments and objections filed by Alliance for the Wild Rockies on the Gold Butterfly, Mud Creek, Bitterroot Front, and all other BNF projects proposed since the 2006 Draft Forest Plan was circulated for public comment.

The AP states, “Modification of standards in Management Areas 1, 2, 3a, and 3c is also needed to delineate old growth by stand as identified in Forest Service Handbook 2409.17.” Yet the AP fails to disclose the specific standards the Supervisor holds in so much contempt.

The AP states, “Green et al. includes quantitative and qualitative (old-growth) criteria that are measured in the field by ...site-specific stand exams and walk-through exams.” The AP *rejects* the current Forest Plan definition it states in full, while mentioning “criteria” and “associated characteristics” without explicitly stating *which* of the Green et al. criteria and/or associated characteristics would be *included* as nondiscretionary numerical standards in the amended forest plan. The AP also fails to explain *how those criteria and/or associated characteristics would be used by* the FS in site-specific stand exams and walk-through exams.

The AP states, “This definition (based on Franklin et al. 1981) was the best information the Forest had for describing old growth characteristics when the plan was developed in the 1980s. However, this definition has several limitations. These criteria were developed for the Cascade Mountains Douglas-fir forest type, which is not representative of conditions or the fire return intervals found on the Bitterroot NF.” However this statement is partially false. At no place in the Forest Plan or in its EIS is Franklin et al. 1981 identified as the source of the old-growth definition. The AP also states, “Many of the attributes in this definition cannot be accurately measured in the field nor are part of standard data collection protocols so they cannot be assessed at a forest-wide scale to determine if plan goals and objectives are being achieved.” *Which of those attributes cannot be accurately measured in the field?* This appears to be another FS distortion of fact.

It is apparently the FS’s unstated agenda that it will *only* be using statistics from FIA data to “determine if plan goals and objectives are being achieved” in relation to old growth. The inherent problems with this approach are also discussed in Juel (2021). In short, the locations of the plots from which FIA statistical results are derived remain confidential, which means that neither the public nor anybody directly related to BNF management—not the biologists or other specialists, not even the Forest Supervisor—can verify the data nor visit the old growth alleged by the FIA to exist. In other words, what the Forest Supervisor is proposing to do is install arbitrary and capricious management in place of good science and sound analyses.

The AP doesn’t explain how the current old growth definition obstructs specific forest plan goals, objectives, or desired conditions. However the AP does claim that amendment would help in “evaluating whether project activities are maintaining and **promoting old growth characteristics** associated with the varying forest types and habitat type groups (biophysical settings)” (emphasis added). There is nothing in the Forest Plan about forest types or biophysical settings but it does mention various habitat types. Are the 1987 Forest Plan habitat types the exact same as the habitat types being utilized in the Amendment process? Also, what exactly are

the “old growth characteristics” (emphasized above) that “project activities are maintaining and promoting”?

The AP claims, “The purpose of the 1987 Forest Plan coarse woody debris requirements is to maintain soil productivity, design fire management programs consistent with other resource goals and to provide for non-game habitat.” The AP fails to disclose the “coarse woody debris plan standards in Management Areas 1, 2, 3a, 3b, and 3c” the FS is planning to eliminate. Does this mean all those related to soil productivity, fire, and non-game habitat?

The AP fails to cite any “updated” science regarding management of snag habitat. Again, we refer you to the above mentioned Alliance for the Wild Rockies comments and objections for best available science.

In conclusion, we thank you for soliciting and considering our input on the proposed forest plan amendment.

Sincerely,



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