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February 2, 2024

Submitted via: www.regulations.gov

Ms. Linda Walder
Acting Director, Ecosystem Management Coordination
USDA Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System. Document Citation: 88 FR 88042; Document Number: 2023-27875 Notice of Intent to prepare an environmental impact statement.

Dear Ms. Walder:

On behalf of the Idaho Department of Lands (IDL), thank you for accepting these comments regarding the USDA Forest Service's (USFS's) proposed amendments to all 128 national forest land management plans to conserve existing and recruit future old-growth forests on the National Forest System lands.

Healthy, resilient forests on federal lands are essential to accomplishing IDL's mandates as well as to the State of Idaho as a whole. A large percentage of the 2.5 million acres of State endowment trust lands managed by IDL border lands managed by the USFS and Bureau of Land Management. Endowment lands are primarily managed for the purpose of maximizing long-term returns to the trust beneficiaries—with the largest endowment beneficiary being K-12 public schools. Insect and disease outbreaks and wildfires on federal lands do not recognize jurisdictional boundaries and pose a threat to private property and State endowment trust lands. IDL is also responsible for fire protection of over 9 million acres of federal, state and private forest and range lands throughout Idaho. IDL has become increasingly concerned about the risk of wildfire to private property and livelihoods as rapidly increasing populations in many rural communities are near federal forestlands.

The current federal land management needs at the state scale are unprecedented. Of the 20 million acres that are managed by the USFS in Idaho, only 12 million acres are available for some form of management, with 8 million acres at high risk from forest pathogens, diseases, and high-intensity wildfires. Within these landscapes, 6.1 million acres have been designated by the US Department of Agriculture, with input from the State of Idaho, to prioritize the highest risk areas for treatment. Recognition of the threats posed by current forest conditions has

necessitated increased cooperation among federal, state, and local entities, including regulatory authorities and fire organizations in Idaho.

Idaho has developed effective partnerships and collaborative teams to accomplish mutual goals and effectively respond to forest threats. Idaho's "Shared Stewardship" initiative emerged as a result of increased collaboration between the State and the USFS, and on December 18, 2018, the State of Idaho, USDA, and the USFS Northern and Intermountain Regions executed the first Agreement for Shared Stewardship in the nation. IDL has since developed robust programs and is utilizing all available resources such as state and county Good Neighbor Authority agreements, Joint Chiefs' Landscape Restoration Partnership projects, and increased wildfire mitigation grant funds to expedite desperately needed forest health treatments across the landscape.

IDL RECOMMENDATIONS AND CONCERNS:

IDL strongly urges the USFS to reconsider the current proposal of amending 128 National Forest Land Management Plans through a single Environmental Impact Statement. This sweeping approach to amending policy, affecting millions of acres of public lands, risks undermining the trust of the public and collaborative partners such as the IDL. Major forest policy decisions, including amendments to existing forest management plans, should be accomplished through robust local engagement and public participation, not through a top-down directive from Washington, D.C.

The USFS, and the public, would be better served through individual plan revisions and amendments at the National Forest levels. Our national forests are ecologically and geographically unique and require different approaches based on local conditions. Federal forest land management agencies must incorporate regional and/or local knowledge, historical data, and cultural definitions into their land management plans—as well as the existing successful regional strategies to conserve old-growth forests.

Protecting old-growth forests requires active forest management within and adjacent to existing old-growth stands to protect them from these threats. IDL concurs with the initial findings of the threat analysis required by executive Order 14072, indicating that wildfire is the leading threat to mature and old-growth forest conditions, followed by insects and disease. Increasing science-based, active forest management to reduce catastrophic wildfire damage and improve forest health and resilience is critical in conserving old-growth stand structures.

IDL is strongly opposed to establishing limitations for diameter or age that would result in restrictions for harvesting timber. Use of these arbitrary limits can be in direct conflict with the

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goal of sustaining and promoting old-growth forests. These types of restrictions also may not be compatible with all forest types in all locations. It must be recognized that certain forest types have a natural stand dynamic of low frequency/high severity disturbance and, by their very nature, when they reach maturity, they are inherently not resilient. The species composition within many forests in the West has been dramatically altered due to fire exclusion and a decline in vegetation management. This situation has resulted in an unnatural prevalence of shade tolerant species which are typically more susceptible to forest health issues. Active management is required to address existing forest health issues and promote fire adapted species that were historically present within these landscapes.

The proposed national amendment will negatively impact active management activities in Idaho that are critical to the Wildfire Crisis Strategy. The proposed national amendment will result in conflicts with established management plans and result in greater vulnerability to objection and litigation. The Nez Perce-Clearwater National Forest recently delayed a decision for the Twentymile Environmental Analysis while forest managers wait for guidance on how to comply with the proposed amendment. This project is entirely within the Lower Salmon River Priority Landscape identified by the USDA as one of the Wildfire Crisis Strategy priority landscapes and is highly susceptible to crown fires and insect and disease outbreaks. The project is designed to address these conditions and maximize retention of old-growth and large trees in accordance with existing Forest Plan Standards. The project proposes 6,807 acres of prescribed burning, 2,209 acres of timber harvest that will support Idaho's rural economy, and 36 miles of road maintenance on existing forest system roads. IDL has invested \$153,316 in contracted services to support planning of this project which has now been delayed by the proposed old-growth amendment.

IDL urges the USFS to focus on management actions that will improve forest health and wildfire resiliency on the most wildfire-prone areas and protect old-growth forests using guidelines and standards in existing National Forest Land Management Plans or amend national forest plans individually as needed.

Respectfully,



Craig Foss
State Forester

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cc: Jace Hogg, Federal Lands Coordinator, Idaho Governor's Office of Species Conservation, jace.hogg@osc.idaho.gov

ec: Dustin T. Miller, Director Idaho Department of Lands, dmiller@idl.idaho.gov