



Thomas J. Vilsack, Secretary of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Re: Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement

Submitted electronically via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>.

September 12, 2024

Please accept these comments on behalf of Wild Montana (formerly Montana Wilderness Association) and our members in response to the public comment period for the draft Land Management Plan Direction for Old Growth Forest Conditions Across the National Forest System.

I. Organizational Background

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana has participated in the development of every national forest plan and subsequent revisions for national forests located within the state of Montana. Wild Montana's 87,000 supporters are invested in the ecological integrity and quiet recreation opportunities on public lands, as well as the impact of climate change on Montana's wild places.

Conserving our remaining mature and old-growth forests on federal lands is an effective, large-scale action the agencies can take to help combat climate change and protect biodiversity. We appreciate the Forest Service's action to initiate a nationwide forest plan amendment that will provide clear, consistent direction for the management of old-growth in national forests. We offer the following comments and suggestions to help the Forest Service finalize a strong, comprehensive amendment that will maintain functioning old-growth ecosystems across the country.



II. Wild Montana supports the proposed Amendment.

We appreciate the Biden Administration's commitment to conserving the remaining critically important old-growth forests and taking this step toward better nationwide forest management. We support the intent of the proposed amendment and restricting commercial timber harvest in old-growth forests, while still allowing for ecologically restorative and preventative management activities. Ecosystem integrity should always be the central goal for management of old-growth forests, not economic profit. We also recognize the need for flexible habitat, fire, insect, and disease management in order to sustain ecosystem integrity and the function of ecosystem services. In some cases, succession and the legacy effects of past management may have resulted in more mature forest cover than the natural range of variation which may not be ecologically sustainable under current climatic predictions. Adaptive management in the face of our changing climate will be important. We are interested in seeing how the *Adaptive Strategy Plans* come together.

We were glad to see the amendment continue the use of existing old-growth definitions from each forest. The Green et al. paper has been used by the Northern Region since 1992.¹ The use of existing definitions and frameworks will make implementation of the amendment more straightforward for local Forest Service staff.

We also applaud the Forest Service for creating NOGA-FW-GOAL-01, which promotes tribal sovereignty, co-stewardship, and the incorporation of Indigenous Knowledge. We suggest adding a complementary Desired Condition around tribal inclusion and the use of Indigenous Knowledge.

III. The Forest Service should strengthen certain provisions to attain the intent of the proposed Amendment.

While Wild Montana believes the proposed Draft Environmental Impact Statement (DEIS) standards are a good starting point to move towards conserving old-growth forests, there are a few areas we would like to see strengthened in the final plan Amendment.

¹ Green et al., *Old-growth forest types of the Northern Region*, U.S. Forest Service (1992, with errata through 2011).



A. Non-degradation or impairment standard.

The Notice of Intent included a standard that stated, “[v]egetation management activities must not degrade or impair the composition, structure, or ecological process in a manner that prevents the long-term persistence of old-growth forest conditions within the plan area.”² The DEIS has removed this clause and instead further emphasizes that management may only be used for proactive stewardship. Standard 1 must be restored in the Final Amendment to ensure that management activities lead to the appropriate outcome.

Further, proactive management is often needed to restore ecological conditions, especially in drier forest types. However, in moist forest types where fire is less frequent, a passive stewardship approach may be needed at times. Standard NOGA-FW-STD-02a should include explicit reference to the idea of passive stewardship alongside the language regarding proactive management.

B. Recruiting and restoring old-growth trees.

Equally important to conserving existing old growth will be increasing mature and old-growth forest cover, in order to restore ecological integrity and mitigate the effects of climate change. Thoughtful stewardship of mature forests can help restore and expand old-growth. With very little remaining old-growth on national forest lands, allowing mature forests to develop into old-growth and expanding the distribution and abundance of old-growth forests will be key to helping combat climate change and protect biodiversity. The Amendment should incorporate strong monitoring and accountability measures to track the abundance and distribution of mature and old-growth forests. While the management approaches provide guidance that the *Adaptive Strategies* will identify and prioritize old-growth recruitment, the Forest Service should contemplate more affirmative plan direction in either a standard or guideline to ensure that this outcome is achieved.

IV. The Forest Service should provide clarity about the *Adaptive Strategy for Old-Growth Forest Conservation Plans*.

The long-term success of the proposed amendment largely hinges on the creation of each *Adaptive Strategy Plan*. We would appreciate additional details regarding the creation and scope of the adaptive management plans. The DEIS states that the strategies will be created on

² 88 Fed. Reg. 88,047 (Dec. 20, 2023).



the local level and that “one or more Forest Service units may create a joint *Adaptive Strategy for Old-Growth Forest Conservation*.” We would appreciate clarity about the appropriate scope of the plans, how many units could be governed by one strategy plan, and how that may be determined.

The DEIS puts forward the objective that under each *Adaptive Strategy Plan*, the units will initiate at least three proactive stewardship projects. It is unclear how this will operate for plans encompassing multiple units or if there are single units that do not require three proactive projects. Generally, we support proactive stewardship projects that promote healthy ecological conditions. While it is a good concept to do three proactive projects a year, Forest Service resources and capacity are often tight, especially in some forests in Montana that are already focusing on important issues like wildfire risk reduction, travel planning, and forest plan revision. We would appreciate details about how the Forest Service will work with forests that may not need three proactive projects, especially in light of other competing priorities. The final Amendment should also make clear that proactive stewardship projects and activities include more than just vegetation treatments. Activities such as route decommissioning and trail rerouting, for example, could be considered proactive stewardship if it helps the ecological integrity of stands that are important for conserving, recruiting, or restoring old-growth conditions. It is also critical that the final Amendment contemplates providing additional resources and staffing to complete the creation of each plan and carry out the three subsequent projects.

V. The Forest Service should contemplate additional policies.

The proposed Amendment represents a significant step towards conserving old-growth across our National Forests. Ensuring durable protections for mature and old-growth forests will complement the agency’s other priorities, including efforts to improve wildfire resiliency, enhance access to outdoor recreation opportunities, secure wildlife habitat, and protect clean drinking water. In addition to the proposed Amendment, the Forest Service should consider opportunities to prioritize durability and implement regulations that will guide the management of old-growth into the future, well past future plan revisions, and other administrative changes. The agency should continue to consider updating the Forest Service Handbook and Forest Service Manual to include updated old-growth and climate-smart forestry direction.



VI. Conclusion

Thank you for your consideration of our comments. Please do not hesitate to contact us if you have any questions.

Sincerely,

Maddy Munson
Public Lands Director
Cell: (406) 312-8741
Email: mmunson@wildmontana.org

Aubrey Bertram
Staff Attorney, Climate & Energy Director
Cell: (303) 956-5263
Email: abertram@wildmontana.org