



September 19, 2024

Thomas J. Vilsack
Secretary of Agriculture
Department of Agriculture

Re: Draft Environmental Impact Statement - Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Dear Mr. Vilsack:

The Ruby Valley Strategic Alliance (RVSA) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) regarding the effects of amending land management plans to address our old growth forests.

The Ruby Valley Strategic Alliance is a diverse alliance of individuals and organizations that find common ground through shared conservation values for the greater Ruby landscape in Southwest Montana. In our landscape, working ranches and public lands are inextricably tied; we believe management decisions about both are strengthened through lasting partnerships. We value maintaining and enhancing our working lands, outdoor way of life, wilderness heritage, quiet country, and high-quality recreation experiences. The RVSA works collaboratively on a foundation of trust to respond to threats to our values, advocate for the places and way of life we cherish and promote positive stewardship of Ruby Valley.

We have commented on this topic during the last two public comment periods and are pleased about a number of things currently included in the Draft EIS. Namely, we very much appreciate that the Service has chosen to maintain the old growth definitions at what is currently being utilized on each Forest. We also appreciate that this amendment provides for exceptions within the Wildland-Urban Interface and within forests that are not conducive to old growth - like lodgepole pine. We are excited that this amendment encourages active management in old growth stands when ecologically necessary and look forward to old growth conservation practices being made consistent across the National Forest system. We also appreciate the Adaptive Management Strategy development as currently laid out, given that it will involve local input and will be a process led by the professionals within each National Forest. Lastly, we are encouraged to see that the Adaptive Management Strategy also contains calls for the identification of three priority projects and hope that these projects will be built from the existing Program of Work for each Forest, to help drive key projects that have already been identified while also incorporating an aspect old growth retention and improvement.

In addition to the items within the DEIS that we appreciate, we have identified several items that we have some strong concerns about and encourage you to evaluate as you move toward a Final EIS. These are explained below:

Detail Level of Standards

We are concerned that the direction in the amendment could be confusing for line officers and therefore challenging to implement. In simple terms, the standards and some objectives are overly detailed and may lead to misunderstandings and impasse, which would impair the amendments' objective to provide local flexibility to screen, analyze, and treat old growth forests as necessary. The standards within the DEIS and amendment as proposed contain a very high level of detail and are reminiscent of standards that would arise during the NEPA process for a specific project. In comparison the level of detail included in standards within a Forest Plan is typically much less, which makes it feasible for Forest Service staff to utilize specific standards when they are screening a project prior to beginning NEPA at the project level. Given that these standards would be added into each Forest Plan, we encourage the Service to simplify the standards to something more typical of what you would see in a Forest Plan so that project screening and implementation can be more easily accomplished by staff in the manner that is envisioned.

Additionally, we encourage the Service to develop a range of tools to help guide staff charged with implementing this amendment. This includes an implementation plan that would provide step-by-step instructions on how to operationalize this amendment, when you can utilize the exceptions, how to identify priority areas for conservation and recruitment of old growth, etc. We also recommend that the Washington Office continue to invest in the development of best available science at the national level to provide more and improved assistance to local Forest Service offices and collaboratives as they implement this policy at the project level.

Increased Clarity on the Adaptive Management Strategies

As members of a local collaborative, we look forward to engaging with our local National Forest on the development of the Adaptive Management Strategies but would like more clarity on how you envision the public input process rolling out. Do you intend these plans to include several public comment periods? Will there be a mandated number of public meetings, and how will that number vary depending on the planning unit's size? Do you intend to invest in additional capacity at the local level to help staff develop these plans and lead these collaborative processes?

Additionally, we would like the next iteration of the EIS to make it clear that proactive stewardship projects and activities include more than just vegetation treatments. Things like route decommissioning and trail rerouting, for example, could be considered proactive stewardship if it supports the ecological integrity of stands that are important for conserving, recruiting, maintaining, and restoring old growth conditions. This broader bucket of proactive stewardship would include things like travel planning - something that has been in the works for over a decade on the Beaverhead-Deerlodge National Forest. Broadening the scope of proactive stewardship would allow resources to go where they are really needed and allow those proactive stewardship projects to address the full range of activities that could impact an existing or potential future stand of old growth.

Public Input to Date

The action of amending all Forest Plans within the National Forest System at once is unique and given that Forest Plans typically take years to complete and large amounts of public input, comparatively this amendment process has involved far less. We appreciate the amount of public input and comment periods you have had to date, are encouraged by the more locally focused Adaptive Management Strategy's potential for public input and wish there could have been more opportunities for public meetings and discussion held at the Forest level during this amendment process, which is in line with the 2012 Planning Rule which emphasizes incorporating public and local government input.

Lands Suitable for Timber Production

Statements throughout the Draft EIS consistently say that the standards and objective as written will not affect outputs of timber and will not economically affect local public and local governments. Yet, there is no analysis or way to predict this within the Draft EIS. A dangerous presumption without actual analysis is a flaw that needs to be addressed.

Direction Regarding Healthy Old Growth Stands

RVSA is pleased to see that the nexus between old growth, wildfire, and timber management has been acknowledged through this amendment in the form of encouraging proactive stewardship in old growth forests where human-caused disturbances like fire exclusion has occurred. We recognize that these degrading factors are a threat to old growth, and that our best tool for bringing these impaired forests back into a healthy state often involves vegetation management and stewardship. However, there is less detail in the DEIS and amendment regarding management tools to be utilized when non-degraded Old Growth forests are identified. In these areas, we would like to see the Forest Service have the option of a more "passive-stewardship" approach. As explained in the DEIS analysis, healthy old growth forests provide large ecological benefits to our public lands, and we do not want this amendment to reduce the opportunity for healthy old growth forests to continue to grow and naturally balance themselves where appropriate.

Forest Service Capacity

This amendment, although positive in many ways, will increase capacity constraints on Forest Service planning staff in several negative ways – when incorporating this amendment into all the individual Forest Plans, when developing the Adaptive Management Strategies, and by requiring it be added to project screening which we fear may lead to an analysis impasse and detract from the amendment's objective (see Detail Level of Standards). We ask that the Forest Service acknowledge this additional workload, and the fact that planning staff are already likely at capacity and implement any and all actions possible to support these staff and hire additional staff. That said, local stakeholders like RVSA remain a steadfast partner to help the agency with these capacity gaps. This includes members of the public who know these lands, scientists at academic institutions located in and around our forests, and local collaboratives who can help provide social license and community-based solutions to make our forests healthy. We also

reiterate our desire for the agency to issue implementation guidance to help improve clarity and reduce and avoid unnecessary demands in the implementation phase.

Summary

The members of the Ruby Valley Strategic Alliance appreciate the direction this amendment and Draft Environmental Impact Statement has taken. It incorporates local definitions and logical exceptions, expects units to collaboratively develop community-led adaptive strategies to conserve old-growth, and encourages consistency and treatments where warranted. Additionally, we look forward to seeing the Final Environmental Impact Statement and the ways this amendment process and future implementation can be improved, namely, by reevaluating the detail level within the standards, developing implementation guidance and tools, providing clarity on the development of the Adaptive Management Strategies, addressing under-analyzed statements and assumptions, providing management guidance for healthy old growth forests, and addressing capacity constraints.

Thank you for considering our comments.

Sincerely,

The Ruby Valley Strategic Alliance:

John Anderson, Ruby Dell Ranch
Neil Barnosky, Ledford Creek Grazing Association & Silver Spring Ranch
Gary Giem, Warm Springs Grazing Association & Giem Angus Ranch
Les Gilman, Gilman IH Cattle Company
Gary Giem, Warm Springs Grazing Association & Giem Angus Ranch
John Helle, Helle Livestock
Rick Sandru, Ruby Valley Stock Association & Sandru Ranch
Sandra Whitefeather, Ruby Valley Conservation District
George Trischman, Former Chairman, Montana Public Lands Council
Chad Klinkenborg, Montana Land Reliance
Chris Edgington, MT Trout Unlimited
Dan Allhands, Madison County Commissioner
Dan Durham, Ruby Habitat Foundation
Emily Cleveland, Wild Montana
Jim Berkey, The Nature Conservancy
Kathryn Eklund, The Wilderness Society
Sally Schrank, The Greater Yellowstone Coalition

cc: Randy Moore, Chief, US Forest Service
Chris French, Deputy Chief, US Forest Service
Linda Walker, Director of Ecosystem Management and Coordination, US Forest Service