WHITEBARK INSTITUTE

September 19, 2024

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: Comments on Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

The Whitebark Institute is a non-profit organization based in Mammoth Lakes, California. We partner with the Inyo National Forest to plan, implement, and oversee ecological thinning and restoration projects on the Forest.

We agree that restoring resilience to and protecting old-growth forests is important for the many reasons given in the Draft EIS (e.g., long-term carbon storage, improved watershed health). Although the intent to address policy for management of old-growth forests at the national level is understandable and mostly desirable, the broad scale may have made the process unnecessarily complex and difficult to administer and obtain meaningful public input. As the process moves forward, we hope that policies will be fine-tuned at the Forest Service Regional level in recognition of the vast biophysical differences between Regions (as is briefly acknowledged in section 1.5 [page 4]). Overall, we support the changes that will be made to the Inyo National Forest Land Management Plan under this new direction. However, we have a few concerns that we would like to be addressed:

1. The DEIS appears to overlook some of the "best available science" for the Sierra Nevada by not explicitly including findings from the Sierra Nevada Ecosystem Project (SNEP). Even though this work was conducted a quarter-century ago, it established a thorough state-of-knowledge that remains sound. Findings produced by the SNEP effort should be included and discussed in the EIS. Relevant chapters of the SNEP report to Congress are below:
    - *Late Successional Old-Growth Forest Conditions, Chapter 6 of Volume 1:*
    SNEP Science Team and Special Consultants, 1996. Late Successional Old-Growth Forest Conditions. In: Sierra Nevada Ecosystem Project, Final Report to Congress, volume 1, Assessment Summaries and Management Strategies. Centers for Water and Wildland Resources, University of California, Davis. Pp. 91-112.

    - *Assessment of Late-Successional Forests, Chapter 21 of Volume 2:*
    Franklin, J.F., and J.A. Fites-Kaufmann, 1996. Assessment of Late-Successional Forests. In: Sierra Nevada Ecosystem Project, Final Report to Congress, volume 2, Assessment Summaries and Management Strategies. Centers for Water and Wildland Resources, University of California, Davis. Pp. 627-669.

- *Alternative Approaches to Conservation of Late-Successional Forests in the Sierra Nevada and Their Evaluation, Chapter 3 of Addendum:*

Franklin, J.F., D. Graber, K.N. Johnson, J.A. Fites-Kaufmann, K. Menning, D. Parsons, J. Sessions, T.A. Spies, J.C. Tappeiner, and D.A. Thornburgh, 1997. Alternative Approaches to Conservation of Late-Successional Forests in the Sierra Nevada and Their Evaluation. In: Sierra Nevada Ecosystem Project, Final Report to Congress, Addendum. Centers for Water and Wildland Resources, University of California, Davis. Pp. 53-70.

2. On the Inyo National Forest, and likely many other Forests, old-growth trees are declining due to stressors such as drought and pest outbreaks. For example, old-growth red fir has been in decline for many years on the Inyo in large part because of moisture stress. There is no guidance in the EIS on how to identify and manage declining old-growth stands, and some management actions proposed may not be beneficial for long-term forest health in stands with declining old growth. For example, in the 'Technical Guidance for Standardized Silviculture Prescriptions for Managing Old-Growth Forests', this is stated: '*When large tree densities meet or exceed desired conditions, thinning to increase heterogeneity and resilience should emphasize retention of the oldest and largest trees*.' However, if old-growth trees are declining, while they should be retained, treatments should emphasize retention of residual, healthy but smaller trees that can take the place of these declining old-growth trees once they die. In stands where the oldest trees are likely to die soon, management needs to favor the next sequential age-group of trees to maintain some desirable characteristics of an old-growth forest. Emphasizing the retention of only the largest trees in declining old-growth stands would result in a loss of the most vigorous trees on the landscape. We think that this issue should at least be acknowledged in the EIS and there should be specific management direction on how to treat declining stands, or potentially exclude such stands from the management actions defined in this EIS.

3. We recommend that the category for the LMP of the Inyo National Forest in Appendix C, Tables 1, 4, & 5 be changed from category 3 to category 2. The current LMP appears to meet the requirements for category 2.

4. We recommend that some consideration be given to emerging concepts of managing for vigorous large trees by minimizing competition through active maintenance of very low (with respect to current conditions) stand density [for reference: North, M.P., Tompkins, R.E., Bernal, A.A., Collins, B.M., Stephens, S.L. and York, R.A., 2022. Operational resilience in western US frequent-fire forests. *Forest Ecology and Management*, *507*, p.120004.]

5. Many aspects of the policy changes, starting with amending the LMPs but also including items such as increased levels of monitoring and enhanced Tribal participation, will be costly. What are the likely budgetary impacts and is there a realistic possibility of additional Congressional appropriations to cover the costs? Are there plans or recommendations for increasing funding or otherwise increasing capacity at agencies and partners to implement these policy changes?

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6. The two-year schedule for creating strategies through a collaborative process in Objective 1 seems unrealistic. We recommend a three-to-four-year period with some intermediate milestones is needed to develop a high-quality result.

In conclusion, we believe that protecting and conserving old-growth forests is of key importance. However, the document should be improved by including the following recommendations:

- Incorporate best available science for the Sierra Nevada;
- Include a discussion of and guidance for treatment of declining old-growth forests;
- Consider treatments that support thinning to a very low density ;
- The document and process does not adequately consider the time necessary for collaborative processes or the high cost of monitoring and enhanced Tribal participation;
- The classification of Inyo LMP should be changed to a category 2 plan.

Thank you for the opportunity to comment.

Sincerely,

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