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October 28, 2024

Stephanie Miller,
USDA Forest Service
Assistant Director for Future Forest,
Denver Federal Center, Building 40
Lakewood, CO 80215

In Re: Forest Service Manual 2470, Silvicultural Practices (Federal Register August 16, 2024 (89 FR 66671))

Dear Ms. Miller:

Thank you for the opportunity to provide comments on Forest Service Manual 2470, Silvicultural Practices. Idaho Forest Group (IFG) is one of the largest producers of softwood lumber in the U.S. with seven manufacturing facilities in Idaho and Mississippi capable of producing well over 1 billion board feet of lumber annually. A large portion of our raw material supply comes from Region 1 and Region 4. These types of directive changes to the Forest Service Manual are very relevant to our operations as well as the successful communication and implementation of silvicultural prescriptions to meet Forest Service objectives on the ground.

Utmost, we urge the Forest Service to direct silviculturists to generally simplify the prescriptions used to avoid unnecessarily complex timber sale operations, and to draw from the considerable knowledge and experience in the Forest Service and outside the agency. Silviculturists should also be provided with better direction on how to develop silviculturally appropriate prescriptions which can be readily used for projects being conducted using designation by description or designation by prescription. While in theory any prescription could be used in such a project, again, simpler prescriptions will generally work better.

We must express our concern that the Forest Service is now incorporating "assisted migration" into its manual and directives process. While we recognize that forest managers must be cognizant of climate change and use reliable scientific data and observations to drive local management, we believe the Forest Service must be more transparent in incorporating the concept of "assisted migration" into its handbook, manual, and other policies. How and in what situations the Forest Service implements climate-adapted practices should be very regional and site specific and is a decision better left to individual Forest units.



Below are specific comments on the proposed silviculture manual language:

In Sec. 2470.03 – We recommend the following change: “Policy for prescribing, implementing, and monitoring silvicultural practices that are used to restore, sustain, and foster the health, resilience, ~~and~~ productivity, *and multiple use management* of forests on National Forest System lands at stand and landscape scales is as follows”

We recommend adding a subsection 10 under policy:

“10. Ensure that local bidders receive adequate notice of and are provided the opportunity to bid on all opportunities for contracting silviculture activities, including those conducted under Stewardship Contracting, Stewardship Agreements, Good Neighbor Authority, and others as appropriate.”

The Definition of Thinning: (p. 19 – 20) (“An intermediate treatment made to reduce stand density of trees primarily to improve growth, enhance forest health, to recover potential mortality, otherwise to promote stand development toward or conserve characteristic old-growth conditions.”) is unnecessarily focused on creating “old-growth conditions” (which are also not defined in the definitions section of the manual). Thinning may be conducted for a number of reasons – to meet specific habitat objectives, to allow safe reintroduction of prescribed fire, to provide a sheltered fuel break to aid in fire suppression among them. We suggest changing this read “to reduce stand density of trees to improve growth of residual stand, enhance forest health, reduce potential mortality, and to meet specific forest plan objectives.”

The reference to “REPLANT Act” in the definition of “Unplanned event” is unnecessary. Clearly there are other definitions in the manual that are based on other statutes. It’s not clear how adding this lone reference to a statute (without providing a code citation) helps clarify the meaning of “unplanned event.”

In the definitions, we recommend you add a definition for “resistance.” Managing for forest “resistance” is an appropriate approach for many western national forests and needs to be part of any discussion about reducing the risk of catastrophic fires and insect epidemics and increasing long-term resilience. Sections 2470.03 Policy and 2477.02 Objectives – should add discussion about appropriateness of managing for “resistance” to catastrophic fire and insect epidemics.

We object to Sec. 2471.03 – Policy 4, which states: “Base detailed prescriptions, upon current stand and desired conditions. Consider interdisciplinary input, including climate science, indigenous knowledge, and stewardship of old-growth forests.” IFG strenuously objects to the prioritization of old-growth forests. There is no statutory basis for orienting all



silvicultural prescriptions toward “stewardship of old-growth forests.” Old-growth forests represent a significant proportion of all forested lands on the National Forest System, and do not meet the ecological needs of all plant and animal species occurring on the National Forest System, not to mention species of conservation concern. Moreover, more than half of all current old-growth forests on the National Forest System are already in low- to no-management status, including designated Wilderness Areas, Inventoried Roadless Areas, National Monuments, and others. Fully 42 percent of forested acres on the National Forest System are in these management categories. There is no need (and no justification) for limiting silvicultural objectives on all NFS acres towards “stewardship of old-growth forests.”

It seems odd that under “Responsibility” (2471.04b) that they only “responsibility” of the District Ranger is to “Ensure silviculture prescriptions developed for prescribed fire in forest vegetation settings are reviewed by a prescribed fire specialist or fuels specialist.” This is too narrow and strongly hints at an overemphasis on the use of prescribed fire as a forest management tool. District rangers should ensure that silvicultural prescriptions are implemented which move the forest on their district towards desired future conditions identified in the Forest Plan.

Recommend adding responsibility for Forest Supervisors:

“2472.03b - Forest Supervisor

1. The Forest Supervisors shall plan and program silviculture to meet the objectives of the forest plan. Schedule silviculture treatments as appropriate. Ensure areas planned for silviculture treatments are tracked.”

The Sections on reforestation after unplanned events (2472.2) should emphasize rapid reforestation of areas deforested by “unplanned events.” We are aware of numerous examples where failure to promptly salvage, control competing vegetation, and re-establish stands of trees are leading to type conversion away from forest to more or less permanent brush fields on National Forest System lands. The manual should recognize this phenomenon and take steps to encourage appropriate reforestation, particularly in general forest areas.

Section 2472.3 - Reforestation Process requires the FS to “Practice climate-informed reforestation consistent with land management plans.” While we understand the need to consider climate variability and climate change in making reforestation decisions, we urge the Forest Service to be extremely cautious about deciding to forgo reforestation over concerns that “climate informed” reforestation techniques are unknown or not fully perfected. It is vitally important to reforest as much National Forest as possible, including lands needing reforestation due to natural disturbances and “unplanned events.”

We agree with the statement in 2472.6 - Natural Recovery that “When harvest is applied or if in an area that is considered suitable for timber production, natural recovery is not an



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appropriate prescription. These areas should receive a prescription that calls for planting, direct seeding, or natural regeneration treatments.”

Thank you for the opportunity to provide this feedback on the proposed manual changes.

Sincerely,

A handwritten signature in blue ink that reads "Tom Schultz".

Tom Schultz
Vice President of Resources and Government Affairs