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Comments: From: Jon_Haufler@emri.org

Date: May 16, 2023 at 9:57:01 AM MDT

To: Amanda Milburn <amilburn@fs.fed.us>, gunnar.carnwath@usda.gov, Quinn Carver <quinn.carver@usda.gov>, carolyn.upton@usda.gov, James Burchfield <burchfield.jamesa@gmail.com>, Jonathan Haufler <Jon_Haufler@emri.org>

Subject: Comments from SWCC on assessment

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Amanda and all,

Attached is a letter from the Southwest Crown Collaborative concerning the Lolo Forest Plan Revision. Thanks for considering this input.

Jon and Jim

Sent from my iPhone

To: Lolo National Forest Plan Revision Team

Cc: Carolyn Upton, Quinn Carver

From Southwest Crown Collaborative

The Southwest Crown Collaborative (SWCC) is very interested in being involved with the Lolo Forest Plan revision, and greatly appreciates the open process that the Team has established. We plan to provide input from the Collaborative throughout the planning process.

One area that we have commented on to the USFS in other past NEPA and planning projects has been a concern over providing sufficient detail in describing conditions for desired outcomes resulting from the planned activities. In some of these instances, we have noted a lack of specifics when it came to setting desired outcomes. A response we have heard was that the project team desired to keep maximum breadth through the planning process to allow for project personnel to have greater flexibility in setting final stand thinning criteria or other characteristics for when the project gets implemented. We do not think this is an appropriate response, as the public should be informed to the extent possible about what any project is designed to accomplish and should provide as much detail as possible as to the final resulting conditions.

As the Lolo Forest Plan revision process moves forward, we hope that it provides as much detail as possible in terms of the desired future conditions the plan is trying to achieve. The Planning Rule emphasizes maintaining and restoring ecosystem diversity within the plan area as a key component of the planning process. The Rule defines an ecosystem as: [ldquo]A spatially explicit, relatively homogeneous unit of the Earth that includes all

interacting organisms and elements of the abiotic environment within its boundaries. An ecosystem is commonly described in terms of its: 1. composition, 2. structure, 3. function, and 4. connectivity. These characteristics are not separable in defining an ecosystem- an ecosystem is defined by the combination of all of these together. The best available science allows for such characterization in a planning area, and to properly apply the planning rule, should be incorporated into the landscape assessment and in determination of desired conditions.

Proper application of setting desired conditions for ecosystem diversity means that each forest ecosystem should be analyzed and described in terms of the combination of its potential vegetation type (PVT), species composition, and its structure. Best available data (including VMAP and other tools) should be used to map each of these ecosystems, and desired conditions should describe the desired characteristics of each specific ecosystem. This is quite achievable. Describing or mapping these characteristics separately does not meet this need.

By applying the definition of an ecosystem as included in the Planning Rule, a forest plan can provide information on the desired conditions that should be maintained or restored for an ecosystem at the ecosystem level. This can describe the desired condition of each ecosystem in terms of its desired composition of trees, understory, etc. in the stand as well as the range of numbers and sizes of trees and snags, the openness of the canopy, and the likely ability of the stand to respond to fire, insects, or other disturbance processes. At the landscape scale, the plan can identify the amounts of each specific ecosystem that is desired- comparing what was likely to have been present historically compared to current conditions, and what are desired amounts in the future considering additional factors such as climate change. Providing this information allows the public to fully understand what is desired through forest vegetation management activities going forward. It also provides some assurances that the desired conditions from a forest management action won't be based on a generic recipe for a treated stand condition, or on the opinion of a forest management specialist or line officer as to what a specific ecosystem should look like.

A forest plan that simply makes statements such as desiring increases in ponderosa pine or desiring increases in very large trees without integrating these into specifically desired ecosystem conditions with potential locations where they might occur is not meeting the intent of the Planning Rule. While various Forest Service personnel may desire to maintain maximum flexibility in forest plans, this is not what the public would like to see or should expect as outputs from the planning process.

The SWCC would like to see this level of analysis of ecosystem diversity included in the assessment being compiled for the Lolo National Forest plan revision, and the specific details related to this incorporated into setting desired future conditions in plan alternatives. We would be glad to discuss this further with the planning team if that would be helpful.

Again, thanks for the open process for providing input into the plan revision. We look forward to working with the Forest and Planning Team as this work moves forward.

Jim Burchfield and Jon Haufler

SWCC co-chairs