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Title:

Comments: Attached are my comments regarding the USFS Old Growth amendment for the 128 National Forests. Thank you for the opportunity to comment and also all the live Webinar updates. Much appreciated. Some of my comments were emailed earlier after one of the virtual public updates. I have added to those initially submitted comments and submitting all.

February 1, 2024

To: Mature Old Growth Committee

From: Mike Bechdolt, Consulting Forester/Retired BLM Forester

Subject: Combination of Comments/Recommendations from November 9 MOG Public Zoom Call and Additional Comments due February 2, 2024 on Old Growth Policy.

To Whom It May Concern

Note that I submitted a November 9th letter to the Team and many of those comments are again submitted below in black. I have added additional comments in red with the hope they will be considered during the February 2, 2024 comment period.

Most importantly, I want to first recognize and thank the entire Team for their monumental efforts to date and thank you for additional opportunity to comment.

I received an email from Kari Tilton stating I could provide some additional comments / questions / suggestions related to the Zoom call I participated on November 9, 2023 on the Mature and Old Growth (MOG) Executive Order. Thank you for the additional opportunity to provide comments although I realize they may be considered informal. I recognize that there will be opportunities to provide future comments during a formal public review session. I was just hoping that before the Team finalizes their report and findings, they will consider the following additional issues to see if they are relevant enough to include in the final report.

In listening to the update and the follow-up questions from the participants, I believe the following issues/questions/points would be helpful to consider and possibly include in subsequent reports:

1. Table 12 Land Allocation Expansion/Clarity [ndash] It would be helpful if the team considered expanding information in Table 1 of the initial report to show a breakdown of additional [ldquo]Reserves[rddquo] or land allocations where timber harvesting (particularly in older forests) is limited/constrained/not allowed. Table 1 show three land allocations (Wilderness, National Monuments, Roadless Areas) where timber harvesting is not allowed and/or limited. In Table 12 the category [ldquo]Other[rddquo] I believe includes additional land allocations where timber harvesting is also not allowed under US Forest Service/BLM regional plans[hellip]e.g[hellip]. Northwest Forest Plan and or western Oregon BLM 2016 Resource Management Plan. As the Team is aware, there are millions of acres of Reserves designated under the Northwest Forest Plan in Late Successional Reserves and Riparian Reserves that I assume are included in the [ldquo]Other[rddquo] category on Table 1. One of the participants (Dr. DellaSala) raised the question during the November 9th call [hellip]how will the Team integrate the President[rsquo]s earlier EO (2021-30x30) with the MOG policy. Expansion of Table 1 showing all lands where timber harvesting is limited or constrained may help address this concern/question and clearly provide the eventual decision and policy makers on just how much MOG lands are already conserved. Presently, if my computations are correct for Table 1, approximately 45% of the withdrawn land allocations shown in Table 1 contained MOG forests. If the Team expands Table 1 to include other regional [ldquo]Reserves[rddquo], it should help to address questions raised by Dr. DellaSala on integrating/meeting the corresponding EO for conserving 30% of Federal lands by 2030. Expansion of Table 1 showing additional Reserve land allocations may also provide key information on how much MOG forest is already retained and designated for retention.

Clarify Mature Forest Status in Proposal & Recruitment Sources [ndash]

\* The December 20, 2023 NOI is unclear on how and whether [ldquo]Mature Forests[rddquo] acres will be addressed as part of the Old Growth conservation analysis and amendment. In reviewing various potential comments from different public interest groups, and reviewing the NOI, it is somewhat unclear the role [ldquo]Mature[rddquo] classified forests are going to play. The Team can expect input requesting that all existing Mature and Old Growth forests need protection and not just Old Growth inventoried forests. Hence my recommendation above[hellip] that the Team needs to clarify what role the 80+ million acres of Mature forests (Table 1) will play in the final Old Growth conservation amendment.

\* Will the USFS be also looking at limiting management options in [ldquo]Mature[rddquo] forest as well to sustain a continual recruitment of [ldquo]Old Growth[rddquo] forests? Table 1 of the April 2023 Report indicates a total of 32.6 million (18%) acres of [ldquo]Old Growth[rddquo] forests and 80.1 million acres (44%) of [ldquo]Mature[rddquo] Forests. Will the Proposed Action focus on maintaining existing [ldquo]Old Growth[rddquo] acres or increasing [ldquo]Old Growth[rddquo] acres? If the objective is to increase [ldquo]Old Growth[rddquo] acres, the obvious recruitment source would be to also conserve and/or limit management on the existing [ldquo]Mature[rddquo] classified forests. As the Team is aware, under the Northwest Forest Plan, there are millions of acres already [ldquo]Reserved[rddquo] in Late Successional Reserves. Within the boundaries of the existing Late Successional Reserves, there are thousands/millions of acres of historic even-aged plantations pre 1990[rsquo]s (mostly from 1960-1990 clearcuts). Will the EIS first look at all lands & plantations within the Late Successional Reserves as recruitment acres for Old Growth sustainability or will the EIS look outside the boundaries of the Late Successional Reserves as well for recruitment and sustainability?

\* The Propose Action states [ldquo]the proposed action consists of plan components and other plan content that would be added to all land management plans. Existing plan components in all plans would remain in effect, and if existing plan components are more restrictive, the more restrictive direction would govern. [ldquo] It would be helpful for the USFS to clarify or give an example of this statement. It is assumed that if other guidance from

Regional Plans eg[hellip]Northwest Forest Plan are more restrictive than any final amendment, the more restrictive guidance would apply. For the Northwest Forest Plan region that is also being amended concurrently, will management guidance be 1) Identical, more and less restrictive than the final Old Growth Conservation measures ?

1. Harvest Treatment Table - A second recommendation is related to a comment in the Chat box where a participant (missed their name) suggested the Team look at the actual treatments/commercial timber harvesting/silvicultural prescriptions/cutting methods that the US Forest Service and BLM have been implementing for the past 20-25+ years. The [ldquo]Healthy Forest Management Act[rldquo] was passed in 2003 under President Bush and was a result of his visit to some of the western states and after a season of large fires including the half million-acre Biscuit Fire in southern Oregon. Within that Act, there were recommendations and guidelines for both the US Forest Service and BLM to conserve and consider retention of Mature and Old Growth Trees in harvest prescriptions with an emphasis not on timber production but forest resiliency against wildfire, insects, and disease. Note that this Act was not mentioned during the call but has been providing clear guidance on how USFS and BLM should focus future treatments on federal lands and policy to expedite those treatments and also address MOG forests. Furthermore, within the 1994 Northwest Forest Plan and subsequent BLM Resource Management Plans (1995, 2008, 2012, 2016), there were guidelines for retaining MOG trees including within the Matrix/Sustainable harvest land allocation. One of the participants on the November 9, 2023 call (Randi Spivak(?)) mentioned the US Forest Service issued a 1995(?) goal or agency paper to focus harvesting treatments on forest ecosystem resiliency. Ms. Spivak stated that maybe the USFS had forgotten that direction. It has been my on-the-ground observations and oversight on thousands of acres of federal lands that the focus of present-day treatments on federal lands has been fire resiliency and while retaining MOG trees. Note that I believe that your own data supports this very observation that most of the loss of MOG forest has been from wildfires and insects and not timber harvesting as a result of more conservative/ecosystem focused silvicultural prescriptions. As a practicing federal forester & manager for over 40+ years implementing updated silvicultural prescriptions, many with the Northwest Forest Plan boundary, harvesting of MOG trees is limited and when individual MOG trees are harvested, it is primarily a result of facilitating fuel reduction treatments, retaining desirable fire-resistant trees like pines and Douglas -fir or for safety reasons.

Since 1994, The Northwest Forest Plan, BLM Resource Management Plans, The Healthy Forest Management Act, various lawsuits, USFS Eastside diameter limit (21+[rdquo] rule) and other direction has clearly changed the focus and silvicultural prescriptions across much of the western US on how the two agencies proceed with commercial timber harvests and the focus of the harvest treatment. Yet, during the latest November 9th public meeting that point was not made, nor recognized, nor data provided and seemed to be disputed which leads me to a suggestion for the Team. I believe an additional Table or two would be helpful in the report that summaries the following:

\* The total number of acres harvested by agencies since 1995(?) showing the various cutting methods or silvicultural prescriptions used. For example, was the harvest a: clearcut, overstory removal, shelterwood, selective harvest, thinning, understory thinning, etc[hellip] Note that I know that the BLM has easy access to this data within FRIS (Forest Resource Information System). I am unsure whether the USFS has similar capacity and easy access to this data from their growth and inventory data sources. This data may validate that the predominant cutting method the agencies have been implementing since the 1990[rsquo]s (past 30 years) has been selective harvesting/forest resiliency treatments where the majority of the MOG trees were retained.

\* To validate the above paragraph, a data review of the USFS FIA plots pre and post timber harvest from 1995 to present could confirm that the actual harvest treatment resulted in retention of many or most of the MOG trees in the plots. In other words, the FIA plots could validate that the USFS & BLM has in fact been retaining MOG trees before and after harvest. This would be a factual and objective point to relay to many on the call why the risk and threat to MOG forest is not necessarily from harvesting as your power point alluded to yet seemed to be questioned by many on the call. It would also further validate the slide that post harvest data indicates MOG are being retained during current harvest treatments.

1. Carbon / Climate Change Concern - A number of comments and concerns were raised and continue to be raised regarding climate change and the need to retain more of the mesic Pacific Northwest Forests for carbon reserves offset. By expanding Table 1 to show the present [ldquo]Reserve[rdquo] allocations, particularly the [ldquo]Reserves[rdquo] already in place in the PNW under the Northwest Forest Plan and BLM RMPs, it should demonstrate that the agencies have already set aside 75-80% of federal lands in the PNW in Reserves which in turn are presently meeting forest ecosystem needs and addressing carbon offset concerns. Which leads to the question and discussion during the call: Is there a push to reserve the remaining/all federal lands in the PNW for carbon offset to mitigate climate change.

Successful reforestation is important for carbon storage and lack of reforestation is a concern particularly after massive wildfires. Present day reforestation efforts often do not occur or are delayed for various reason such as:

\* Reforestation in Late Successional Reserves under the Northwest Forest Plan is no longer a priority because often no salvage is allowed or is limited to only along access roads for safety reasons. Thousands of acres of LSR[rsquo]s are not reforested after wildfires where limited live seed trees are available. This often can result in subsequent brush fields for decades. The Team should assess FIA plots over the past 20-25+ years in LSR[rsquo]s and elsewhere across the western states where large fires have occurred and summarize whether any natural seedlings are coming in or whether the site was planted and was the planting successful.

\* Reforestation on many of the larger fires (Bootleg, Oregon) is limited and/or delayed due to lack of viable seed, nursery capacity, available funding, and/or competing brush.

\* How will the team address Old Growth conservation areas after they burn? Will salvage be allowed? If salvage is not allowed, is there any point in reforesting underneath the standing dead timber? How will the team address the standing and down dead fuel loading that could contribute to future wildfire intensity?

1. Milling Infrastructure Slide - I commend the Team for this slide although many on the call seemed to interpret the slide as a threat to MOG forests. I believe the Team was trying to relay that a lack of milling infrastructure limits a regions economic viability to address ecosystem and wildfire resiliency. Instead, I believe some interpreted the slide that commercial logging must increase to support the mills. It would be very helpful to emphasize and maybe the Team did but it was not clear that lack of milling infrastructure limits the capacity of implementing forest resiliency treatments, particularly the need to utilize small diameter/noncommercial material that often is a byproduct of fire and restoration resiliency treatments. For example, within the Fremont/Winema National Forest region, the single most identified need for infrastructure to increase the pace and scale of forest resiliency treatments to reduce wildfire risk has been to build a biomass facility and/or small diameter utilization facilities. Over the past 30 years, 4-5 different companies have initiated studies to locate a biomass plant within the Fremont/Winema region yet eventually backing out. In addition, many of the western states have thousands of acres of encroaching western juniper with no capacity to utilize and therefore get piled and burned. I mention this to the Team with the intent that they consider elaborating and clarifying the slide showing lack of milling structure and expand the discussion to include the need for biomass/small diameter facilities as just or even more critical.

Additional Comments:

\* [ldquo]Implementation Challenges (Can Litigation Be Avoided?)[rdquo] - It is one thing to assess MOG inventory from GIS data using pixels and various attributes and inventory data to categorize and summarize

stand data like age, height, diameter, etc[hellip] and I recognize and commend the Teams efforts to express this national consolidated information and their efforts in defining MOG forests. On the other hand, as an on-the-ground implementor overseeing thousands of acres of harvesting treatments over multiple decades in out of the Northwest Plan Region, I am very concerned how the field & district offices will settle the on-the-ground challenges and inevitable disputes with various interest groups face to face in the field on where and what to harvest. Questions surely will arise such as;

- \* How will Mature versus Old Growth stands be delineated (Flagged/Identified) on the ground?
- \* How will individual Mature versus Old Growth Trees be identified?
- \* Will it be by diameter? Will it be by age? Will it be by individual species? Will it by description?
- \* Will individual trees have to be increment bored to determine age?

\* The BLM in their 2016 Resource Management Plan has already tried to tackle some of these challenges in identifying and reserving individual older trees so I recommend that Team consult with how the BLM addressed similar challenges.

\* The implementation challenges will likely be played out on many field or district offices during the NEPA planning phase of the project with interest groups, particularly in uneven-aged forested stands. Various eyes will see and interpret various stand conditions and very clear guidance will be needed both at the individual tree level and stand delineation level. Even with clear guidance, I foresee that considerable effort will be required to reach consensus and avoid controversy and subsequent litigation. Whatever the final guidance for MOG policy, the Team needs to provide sufficient clarity to avoid some of the constant litigation experienced under the Northwest Forest Plan during its 25+ year history. One only needs to review the history of the Northwest Forest Plan litigation. Even within the Matrix land use allocation where sustainable timber harvesting was analyzed and projected, the BLM and USFS were continually litigated over proposed harvest treatments anticipated and authorized under the Northwest Forest Plan but often did not occur.

\* Cultural Burning: I commend the Team for making every effort to collaborate with the Tribes. One of the repeated messages from the Tribes is their history of [ldquo]cultural burning.[rdquo] As a wildland fire fighter and prescribed burn boss for years, the need for prescribed burning is immense and a proven and effective mitigation tool. For the prescribed burning program to be successful and to increase, various stakeholders need to address challenges and issues outside the scope of this MOG issue. Some of the prescribed burning challenges include; Industrial and Non-Industrial private landowner use of prescribed burning, non-agency Burn Boss liability protection (State of Oregon is addressing through legislation), cross boundary burning opportunities, expansion of prescribed burn capacity among private contractors, education of public on the benefits of prescribed burning, use of all acceptable fuel reduction treatments, review smoke management issues/modifications, etc..

\* Thinning/Selective Harvesting [ndash] The Need for A Stable Sustainable Harvest Land Base [ndash] My final comment is based upon my concern on how the Team will address existing harvest treatments like Thinning or Selective Harvesting, primarily in 50-100+ year old Mature forested stands and on lands allocated for sustainable timber production. Based upon discussions and briefings I was part of in the development of multiple BLM Resource Management Plans over the years, I often heard from interest groups that once a forested stand was thinned (say at age 50 today) and subsequently reached a certain age (say age 80), then that forested stand would now be considered [ldquo]Mature[rdquo] and future management/harvest could now be limited based upon its now [ldquo]Mature[rdquo] classification simply by growing into an older age class. My main concern is how the Team will address the Older Forest [ldquo]recruitment[rdquo] issues raised above in contrast to maintaining a sustainable and predictable harvest land base, similar to the purpose of the [ldquo]Matrix[rdquo] under the Northwest Forest Plan. Community and economic investment and viability is often based upon a reliable supply of a resource. The present-day milling capacity in many regions has somewhat reached a balance between supply and demand, including in the Pacific Northwest under the Northwest Forest Plan after 30+ years of implementation. New management policies like those being considered with the conservation of Old Growth and potentially Mature forest can have destabilizing impacts to communities, particular smaller communities dependent upon a reliable timber supply. The Team, as much as possible, needs to assure that a sustainable

and reliable supply of timber vital to so many American communities continues to be available and if feasible, insulate that availability from litigation if possible.

Background Information: Note that I am a retired BLM Forester and presently a consulting forester that has worked in the California/Sierras (USFS 1973-1979), Oregon/BLM (1980-2012) and Washington DC (Senior O&C Forester 2012-2018) and assisted in developing three different BLM Resource Management Plans and implementing NWFP guidelines for over 25 years. The comments above are based upon my participation and observations how the two agencies have adapted land management policies and on-the-ground treatments since 1974. I thank you for the opportunity to provide comments.

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