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First name: Elvy
Last name: Barton
Organization: Salt River Valley Water Users' Assoc & Salt River Pro Ag Impv & Power Dist
Title:
Comments: Elvy Barton

Water and Forest Sustainability Manager

Water Supply

Mail Stop: PAB38W

P.O. Box 52025 | Phoenix, AZ 85072-2025

P: (602) 236-5104

Elvy.Barton@srpnet.com | srpnet.com

February 2, 2024

Linda Walker

Director

Ecosystem Management Coordination

U.S. Forest Service

Management Coordination

201 14th Street SW

Mailstop 1108

Washington, D.C. 20250-1124

RE: Salt River Valley Water Users' Association and Salt River Project Agricultural Improvement and Power District's Comments on the Land Management Plan Direction for Old Growth Forest Conditions Across the National Forest System (88 Fed. Reg. 88,042)

Dear Director Walker:

The Salt River Valley Water User's Association ("Association") and the Salt River Project Agricultural Improvement and Power District ("District"; collectively "SRP") appreciate the opportunity to provide comments on the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System ("NOI") which proposes to amend 128 land management plans ("Proposed Amendment").

I. BACKGROUND

SRP is the Phoenix Metropolitan area's largest water provider and one of the nation's largest community-based, not-for-profit public power utilities. It consists of two entities: the Association and the District. The Association was formed in 1903 by a group of local farmers within the Salt River Valley ("Valley") as a means to contract with the U.S. Bureau of Reclamation ("Reclamation") for the construction and repayment of costs incurred in building and acquiring the works of the Salt River Federal Reclamation Project ("Federal Reclamation Project"). In 1917, Reclamation turned over the care, operation, and maintenance of the Federal Reclamation Project to the Association. The United States continues to hold title to all Federal Reclamation Project facilities and maintains a supervisory role and regulatory authority over those facilities. The District is an agricultural improvement district organized in 1937. The District and the Association continue to collectively and collaboratively operate the Federal Reclamation Project. This enduring partnership balances the economic risks of the Project and ensures the Valley's success by providing a reliable and sustainable water supply. A brief history of the National Forests that

support SRP and the related ongoing forest stewardship follows.

a. National Forests Established for Water Flows

Five National Forests cover portions of the 13,000 square mile Salt and Verde River watersheds and the 70 square mile East Clear Creek watershed ("SRP Watersheds"): Apache-Sitgreaves, Tonto, Coconino, Prescott, and Kaibab. These forests were reserved to secure favorable conditions for water flows. The early farmers and settlers of the Salt River Project clearly realized the connection between a healthy watershed and a healthy water supply. That same year, the Arizona Territorial Legislature requested that Congress reserve unclaimed timber lands within the watersheds above the Salt River Valley to protect the water flows.

In 1898, President McKinley signed a proclamation, which eventually developed into the Apache-Sitgreaves National Forest, and in 1905 created the Tonto National Forest to set aside lands primarily for the protection of the watershed supplying the Salt River Federal Reclamation Project. Likewise, the Kaibab, Coconino, and Prescott National Forests were established for timber and to protect water flows. The water generated in these forests serves a population of approximately two million people and supplies approximately 750,000 acre-feet of water annually to municipalities, agricultural users, urban irrigation water users and a wide variety of contractual water users including Native American communities and irrigation districts.

These forests produce a critical resource for the Phoenix Metropolitan Area. The entire western region of the United States has experienced some level of drought significantly impacting water supplies. Reclamation is in the process of developing additional measures to reduce Colorado River water use on top of the current operational guidelines to address shortage conditions. In addition to the drought, the increased occurrence of catastrophic wildfires in the West has a negative impact on connected and downstream water supplies.

In this time of drought, water suppliers and users cannot afford to lose additional water supplies to poor water quality or turbidity caused by high-severity wildfire. Some Arizona municipalities could see their Colorado River supplies reduced significantly under existing agreements to address Colorado River shortages , and Central Arizona Project subcontracts could be reduced even further under future agreements. While they are not interchangeable, with the likelihood of continued limitations on Colorado River supplies, SRP water supplies will become an even more critical component of the overall water supply mix for many users. Undermining the reliability of SRP water from the Salt and Verde Rivers puts the millions of people who call the Phoenix Metropolitan Area home at risk.

b. Ongoing Stewardship of these National Forests

Because of the drought and wildfire risks, supporting proactive forest management to reduce high- severity wildfires and improve water flows of these reserved forests has become a cornerstone of SRP. The SRP Resilient Water and Forest Initiative ("the Initiative") actively seeks partnerships with state, local, federal, non-profit and private entities to decrease wildfire risk and severity by removing hazardous fuels and by restoring the forest to a more fire-adapted and resilient structure. The Initiative is made possible by a unique partnership between SRP and the Arizona Department of Forestry and Fire Management and the U.S. Forest Service ("Forest Service") utilizing a Master Good Neighbor Authority agreement and several Memoranda of Understanding between the parties. This partnership structure has proven successful in its ability to leverage the resources and funding of private entities, like SRP, to assist the Forest Service in increasing the pace and scale of forest restoration efforts. SRP and our partners have assisted the Forest Service in completing 5 forest thinning projects, totaling 2,221 acres, and are committed to thinning an additional 91,000 acres across the Salt, Verde, and East Clear Creek watersheds over

the next 10 years.

SRP appreciates that the concerns regarding forest management for wildfire and climate change in our comment letter on the Advance Notice of Proposed Rulemaking ("ANPRM") appear to have been taken into consideration in this NOI; however, it appears that the blanket Proposed Amendment could negatively impact current and future federal projects and authorizations. SRP supports forest health, old-growth forest management, and climate resiliency; provided, however, that old-growth forest management does not come at the expense of the citizens who rely on the water supply generated by the National Forests, impact ongoing wildfire reduction focused forest health initiatives, and impair energy and water transmission and associated vested rights. In response to the NOI, SRP agrees that old-growth forest conditions should be managed; however, SRP submits this letter to express the following concerns:

1. Plan components impact ongoing activities and vested rights;
2. Plan Amendment must comply with the planning regulations;
3. Plan Amendment should be applied prospectively;
4. Plan Amendment cannot cause derogation of the original purpose of the forest; and
5. Carbon sequestration concern.

SRP looks forward to continuing to work with the Forest Service through this Plan Amendment process.

I. PROPOSED PLAN COMPONENTS OF CONCERN

While there are elements of the plan that have merit, SRP objects to a number of the NOI proposed plan components as they could harm ongoing forest stewardship, current authorizations, and future necessary infrastructure facilities.

a. Objective Needs to be Achievable

An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets. The NOI includes an objective that states "[w]ithin ten years, at the unit level, at least one landscape prioritized within an Adaptive Strategy for Old-Growth Forest Conservation will exhibit measurable improvements in old-growth desired conditions as a result of retention, recruitment, and proactive stewardship activities and natural succession." SRP believes this objective timeframe is not based in science nor have an ecological basis.

The ability to see measurable improvements in old-growth desired conditions within ten years is very dependent on the ecosystem, vegetation type, disturbances, climate and other factors.

It is unlikely that measurable progress can be detected in many ecosystems. For instance, in the desert southwest, overgrowth and decades of fire suppression have led to degraded forests and grasslands, or high-severity wildfire induced forest type conversions. For example, significant portions of National Forest's grasslands are now dominated by pinyon-juniper "old-growth" due to the lack of active forest management. The Forest Service should develop metrics to measure old-growth condition progress at the unit level that could be tailored to the ecosystem types and needs.

b. Revise Standards and Exceptions to Recognize the Need to Manage Beyond Proactive Stewardship

SRP believes the NOI standards and their exceptions are drafted in a manner that could preclude currently authorized forest thinning projects from proceeding or delay them while waiting for authorization. Additionally, the exceptions that would otherwise allow these activities to

proceed fail to recognize wildfire impacts to infrastructure and water supplies.

A standard is a mandatory constraint on project and activity decision making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. All projects authorized under a land management plan must comply with plan standards. Existing projects that find themselves outside of the proposed amendments would need to be amended for compliance, risking delays to numerous ongoing and planned future forest health efforts.

SRP believes that the definition of "proactive stewardship" is unclear and fails to recognize the ongoing forest health efforts unique to each forest, particularly as it applies to activities aimed at lowering wildfire risk. The objective states:

(a) Vegetation management in old growth forest conditions must be for the purpose of proactive stewardship, to promote the composition, structure, pattern, or ecological processes necessary for the old-growth forest conditions to be resilient and adaptable to stressors and likely future environments.

The NOI lists activities that promote proactive stewardship. However, vegetation management for the primary purpose of harvesting for economic reasons is prohibited. Vegetation management with a primary purpose of harvesting for economic reasons and proactive old-growth stewardship are not mutually exclusive. By precluding economic purposes for harvesting, the Forest Service is limiting the partnerships that may be formed with industry to facilitate forest health initiatives where some economical trees may need to be cut to bolster the project, without ever compromising the overall benefits to project area. The NOI itself indicates that tree harvest is a "minor threat" to the National Forests, further supporting the assertion that this prohibition is unnecessary. The Forest Service should reconsider this prohibited activity and include flexibility or additional parameters to ensure the old-growth conditions are being met.

Additionally, none of the proactive stewardship activities listed recognizes management that needs to occur for purposes to protect critical infrastructure, protect municipal watersheds, construct renewable energy resources, or mitigate insect and disease outbreaks. The Forest Service should ensure that proactive stewardship includes active forest management activities that protect public health and safety, define public health and safety to include the protection of critical infrastructure and municipal watersheds, and thus remove "reduce fuel hazards to protect public health and safety" from the exceptions list as it is no longer needed as an exception but is regarded as the standard.

The listed exceptions also state that "Exceptions to this standard may be allowed if the responsible official determines that actions are necessary:. . to reduce fuel hazards on National Forest System land within the wildland-urban interface [("WUI")] to protect a community or infrastructure from wildfire; to protect public health and safety;. . [and] [e]xceptions for areas that are ecologically degraded and outside their historical reference conditions and that active forest management will restore the landscape. . .."

There are three main issues with these exceptions. First, SRP maintains critical infrastructure beyond the WUI, which provides a legitimate reason to manage old-growth areas; therefore, this exception would interfere with approved ongoing vegetation management. Second, "to protect public health and safety" is too vague to provide guidance for applicants for the exception. The established purpose of the National Forests within SRP's watershed was to protect water resources for central Arizona. If the Forest Service keeps the public health and safety in the exception category that requires additional determinations, SRP requests the Forest Service to further define "public health and safety" to include the protection of critical infrastructure and municipal watersheds outside of WUI areas.

Finally, the currently documented old-growth vegetation type in Arizona does not match the historic conditions, so this standard will continue to lead the forests further astray. Moreover, the inventory found old-growth forest occurring on 29 different forest types, over 9 million acres of which are pinyon-juniper. Most of the pinyon-juniper acres have developed old-growth characteristics largely due to fire exclusion, which has allowed this cover type to expand its range into other grasslands and shrublands, while allowing this type of forest to live far longer than it did historically. Many of these acres, even if they currently meet regional definitions of "old-growth", should likely be returned to non-forest conditions (in the case of pinyon-juniper), or should be harvested to reset the successional process to ensure future stands of old-growth. The Forest Service should remove this as an exception that requires additional determination and should allow it as a proactive stewardship activity.

c. Revise Guidelines to Recognize Historic Conditions and Comply with MUSYA

A guideline is a constraint on project and activity decision-making that allows for departure from its terms, so long as the purpose of the guideline is met. Guidelines are established to help achieve or maintain a desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. The NOI guideline calls for forest plans to:

(b) retain and promote the development of resilient old-growth conditions adjacent to existing old-growth forest conditions, including for the purposes of reducing fire hazard, altering potential fire spread or fire severity, or reducing potential insect or disease outbreak that may spread to adjacent old-growth forest;

(c) enhance landscape and patch connectivity in forest conditions between old-growth condition patches where connectivity is poor or old-growth patches are isolated; and to

(e) retain and promote the development of old-growth conditions in watersheds,

firesheds, or other relevant landscape units where existing amounts and distributions of old-growth conditions lack resilience and adaptability to stressors and likely future environments.

The proposed guideline applies to areas that do not currently meet the old-growth definitional conditions but have been identified in the Adaptive Strategy for Old-Growth Forest Conservation as a priority for future contribution to the development of those conditions over time. In 2023, the Forest Service's Initial Inventory Framework resulted in the identification of an estimated 24.7 million acres of old-growth and 68.1 million acres of mature forest representing just over 17 percent and 47 percent of the 144.3 million total forested acres of National Forest System lands, respectively.

Focusing on the expansion of old-growth areas regardless of historic conditions and recognition of the multiple uses that National Forests support, will lead to issues with implementing old-growth forest restoration activities and remove over half the National Forest System Lands from certain uses, thwarting the intent of the Multiple Use Sustained Yield Act of 1960 ("MUSYA"). First, by considering half of the National Forest System Lands as potential old-growth, the Forest Service has significantly increased the fiscal responsibility of every unit to manage these lands as such and such capability has not been proven in this NOI. Second, for Region 3, the existing old-growth areas are not representative of historic condition. By incentivizing the expansion of the current "old-growth" the Forest Service is ignoring the largest threat to old-growth which is high-severity and large-scale wildfires. Furthermore, this strategy also ignores the policy direction that Congress laid out in the Infrastructure and Investment in Jobs Act and the Inflation Reduction Act that has led to the creation of the Wildfire Crisis Strategy . Any standards and guidelines regarding proactive stewardship of old growth must be compatible

with the Wildfire Crisis Strategy and not include additional burdensome reviews and determinations.

Furthermore, by creating a guideline that requires the creation of connectivity between old-growth fragment, the guideline does not take into consideration necessary existing rights-of-way that are managed for critical infrastructure and impinges on MUSYA. Prior to issuing a draft environmental impact statement, the Forest Service needs to consider how these amendments impact ongoing forest health efforts and how this comports with the mandates of MUSYA if over half the forest lands prohibit numerous uses.

II. AMENDMENT PROCESS MUST COMPLY WITH PLANNING REGULATION

The forest planning regulations ("planning regulations") set out the planning requirements for developing, amending, and revising land management plans (also referred to as plans) for units of the National Forest System ("NFS"), as required by the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976 ("NFMA"). Under the planning regulations, the responsible official shall ensure that the planning process, plan components, and other plan content are within Forest Service authority, the inherent capability of the plan area, and the fiscal capability of the unit." The Forest Service Manual reiterates this fiscal assessment requirement, stating: "[t]he Responsible Official shall base the plan components on likely budgets and other assumptions that are realistic as required by 36 CFR 219.1(g)."

The NOI fails to comply with the requirements of the planning regulations and Forest Service Manual. Per the NOI, "[t]he amount and distribution of mature forests across the National Forest System suggest that these lands have the inherent capability to sustain old-growth forest conditions into the future." There is a distinct lack of a fiscal capability assessment of each unit

or even a consideration of the fiscal capability of the USFS as a whole to address management of current old forest conditions much less future old forest conditions.

As stated in our response to the ANPRM, SRP still believes that old-growth management is most appropriately dealt with through the planning regulations, so long as the process is consistent with the authority granted therein. The National Office should draft a strategic plan to direct the National Forests to amend plans if the plan does not currently include considerations, strategies, or guidance to sustain and improve old-growth forest conditions. Amendments should occur at the unit level, taking into consideration the fiscal capability and budgets of each forest to ensure management of old growth.

III. APPLY AMENDMENTS PROSPECTIVELY

As stated by another forest permittee almost 30 years ago ". . .retroactive application [of the forest plan amendment] would result in overwhelming resistance to future plan amendments by potentially affected parties." Similarly, SRP requests that the Forest Service use its discretion to state that amendments apply prospectively in any decision document. In NFMA, Congress authorized the Secretary to "develop, maintain, and, as appropriate, revise land and resource management plans for units of the National Forest System." Under NFMA:

Resource plans and permits, contracts, and other instruments for the use and occupancy of National Forest System lands shall be consistent with the land management plans. Those resource plans and permits, contracts, and other such instruments currently in existence shall be revised as soon as practicable to be made consistent with such plans. When land management plans are revised, resource plans and permits, contracts, and other instruments, when necessary, shall be revised as soon as practicable. Any revision in present or future permits, contracts,

and other instruments made pursuant to this section shall be subject to valid existing rights.

It is clear Congress intended to grant the Secretary discretion in amending existing forest plans, including the discretion to determine how those amendments will be implemented. This argument is premised upon section 1604(f)(4), which requires that LRMP's developed in accordance with section 1604 shall:

be amended in any manner whatsoever after final adoption after public notice, and, if such amendment would result in a significant change in such plan, in accordance with the provisions of subsections (e) and (f) of this section and public involvement comparable to that required by subsection (d) of this section.

The plain language of section 1604(f)(4) permits the Secretary to amend existing forest plans "in any manner whatsoever." Since Congress has spoken on this issue, we must give force to its expressed intent. Legislative history indicates that this provision was "needed to make it clear that the government is not taking any private rights or other interest as part of [its] action in compliance with this section." The planning regulations reflect this statutorily enshrined discretion: "[e]very decision document approving a plan, plan amendment, or plan revision must state whether authorizations of occupancy and use made before the decision document may proceed unchanged." Courts have upheld the Forest Service's use of this discretion and public policy favors prospective application of the amendments. Applying old-growth forest standards and guidelines to previously approved National Environmental Policy Act decision documents will delay implementation of ecologically approved activities, ignores Congresses intent to reduce wildfire risks and impacts, and erodes collaboratively developed and stakeholder approved forest restoration activities.

IV. FOREST PLAN AMENDMENT CANNOT CAUSE DEROGATION OF THE ORIGINAL PURPOSE OF THE FOREST

While the Forest Service possesses authority to update and alter administrative management of the national forests, Congress never amended the purposes of national forests established pre-1960. Such forests established pursuant to the Organic Act retain their established purposes and subsequent legislation such as the MUSYA and other legislation did not authorize derogation of these uses to support a different administrative goal. The scope of the Organic Act, the Organic Act's interplay with MUSYA, and the impact of other legislation on the National Forests purposes are discussed herein.

a. The Organic Act

The Organic Act states: "[n]o public forest reservation shall be established, except to improve and protect the forest within the reservation[hellip]or for the purpose of securing favorable conditions of water flows and to furnish a continuous supply of timber for the use and necessities of citizens of the United States."

The objects for which the forest reservations should be made are the protection of the forest growth against destruction by fire and ax, and preservation of forest conditions upon which water conditions and water flow are dependent. The purpose, therefore, of this bill is to maintain favorable forest conditions, without excluding the use of these reservations for other purposes. They are not parks set aside for nonuse but have been established for economic reasons.

Congress further recognized that forests exert a most important regulating influence upon the flow of rivers, reducing floods and increasing the water supply in the low stages. The importance of their conservation on

the mountainous watersheds which collect the scanty supply for the arid regions of North America can hardly be overstated. With the natural regimen of the streams replaced by destructive floods in the spring, and by dry beds in the months when the irrigating flow is most needed, the irrigation of wide areas now proposed will be impossible, and regions now supporting prosperous communities will become depopulated.

As evidenced by the congressional record, prior to 1960, Congress authorized the NFS principally as a means of enhancing the quantity of timber and water that would be available to the settlers of the arid West.

b. Multiple-Use Sustained-Yield Act of 1960

Enactment of MUSYA did not erode or eliminate the established purpose of earlier forest reservations. MUSYA broadened the purposes for which national forests are established and shall be administered to include outdoor recreation, range, timber, watershed, and wildlife and fish purposes. Congress, however, declared MUSYA "to be supplemental to, but not in derogation of, the purposes for which the national forests were established as set forth in [the Organic Act]." This last sentence is significant.

The addition of the sentence to follow the first sentence in section [528] is to make it clear that the declaration of congressional policy that the national forests are established and shall be administered for the purposes enumerated is supplemental to, but is not in derogation of, the purposes of improving and protecting the forest or for securing favorable conditions of water flows and to furnish a continuous supply of timber as set out in the cited provision of the [Organic Act]. Thus, in any establishment of a national forest a purpose set out in the 1897 act must be present but there may also exist one or more of the additional purposes listed in the bill. In other words, a national forest could not be established just for the purpose of outdoor recreation, range, or wildlife and fish purposes, but such purposes could be a reason for the establishment of the forest if there also were

one or more of the purposes of improving and protecting the forest, securing favorable conditions of water flows, or to furnish a continuous supply of timber as set out in the [Organic Act].

Therefore, while MUSYA broadened the management of national forests established pre-1960, it did not retroactively amend a national forest's established purpose. United States v. New Mexico, provides insight into the relationship between the Organic Act and MUSYA. In New Mexico, the U.S. Supreme Court addressed whether stockwatering was an established purpose of the Gila National Forest, which was originally withdrawn for timber and water flows in 1899. The Court stated that while Congress intended the national forests to be put to a variety of uses, including stockwatering, and that while stockwatering was not inconsistent with the two principal purposes of the forest, stockwatering itself was not a direct purpose of reserving the land.

c. Other Legislation

If Congress wanted to curtail an established purpose of a national forest, then it would explicitly amend the reservation; however, it has not acted in such a manner. Rather, Congress continues to encourage multiple use while supporting the original purposes. Congress enacted the NFMA to establish a legal framework for managing natural resources on NFS lands. Among other things, NFMA requires the Forest Service to prepare a land and resource management plan ("forest plan") for each national forest and include in the forest plan standards and guidelines for how the forest shall be managed. NFMA requires that all site-specific actions authorized by the Forest Service be consistent with the forest plan. It is the policy of Congress that all forested lands in the NFS be maintained in appropriate forest cover with species of trees, degree of stocking, rate of growth, and conditions of stand designed to secure the maximum benefits of multiple use sustained yield management in accordance with land management plans. None of NFMA's

provisions designate climate resiliency or old-growth management as potential reservation purposes for the NFS. Rather, it merely reaffirms MUSYA's goals.

The Healthy Forests Restoration Act of 2003 ("HFRA") requires the Forest Service to implement "[a]s soon as practicable" an "authorized hazardous fuel reduction project" on federal land "in wildland-urban interface areas," certain defined classes of federal land proximate to municipal water supply systems or tributaries thereof, and all federal land not otherwise included that contains habitat for threatened and endangered species, provided that certain conditions are satisfied. Nothing in this legislation amends the reservation's purpose. It reiterates Congress's support of the water purpose in the face of the increasing frequency and severity of wildfires.

V. CARBON SEQUESTRATION CONCERNS

For fire-adapted forests in the west, effective adaptation practices for a suite of key ecosystem values will nearly always require significant reductions in overall stand density and basal area to reflect historic stocking levels. Given that most National Forests west of the 100th meridian have at least 20 to 30 percent of their land area in unmanaged land uses (either Wilderness or Inventoried Roadless Areas), the Forest Service should aggressively reduce fuel loads on NFS lands to protect old-growth forest conditions. Doing so will reduce carbon emissions from uncharacteristic wildfires while maintaining healthier watersheds and wildlife habitats.

As the agency is aware, more than half of the lands in the NFS have strict limitations on management. In the Western Regions of the Forest Service, no region has less than 35 percent of its total ownership in either Congressionally designated Wilderness Areas or Inventoried Roadless Areas. Prior to reserving further lands from management, the Forest Service and public policy makers must decide whether there are already sufficient areas in low to no management status. There is evidence that set-asides or reservation from management is not an effective "adaptation

practice" for both old-growth forest conditions and certain wildlife species. As Steel and associates found, recent disturbance trends in western forests test the assumptions behind a static approach to habitat conservation in disturbance-prone systems. "Results from the Pacific Northwest suggest that in dynamic, disturbance-dependent forests, this assumption is not well supported[hellip]" and that "[u]nder climate change, a static approach to mature forest conservation may be even less effective in drier and warmer regions such as the southern Sierra Nevada."

Gaines and associates ("Gaines") found that recovery plans for certain listed species were premised on the idea that long-term or permanent reserves would provide habitat for the protected species during a lengthy recovery period, which was based on the "tacit assumption" that "the climate is stable," which has not "turned out to be true. Managing for northern spotted owls and other late-successional and old forest associated species within the context of static reserves has turned out to be incredibly challenging." In particular, Gaines found that arbitrary age cutoffs did not lead to better management or better habitat for listed species. They note that "[m]any 80-year-old trees are not very large and most today are shade-tolerant and a product of fire exclusion"; thus, even if those trees are found in a particular stand, it doesn't mean they are contributing to habitat quality. In fact, these trees may make the overall stand more vulnerable to stand-replacing fires, which will both release massive amounts of carbon and degrade or destroy the available habitat. The authors found that "[a] considerable body of science and implementation experience" warrants reconsideration of the static reserve approach, as well as the "grave risks of inaction."

As far as forest carbon uptake and storage are concerned, the Forest Service must recognize that management actions that emit carbon to the atmosphere in the short-term may be able to enhance forest growth and provide greenhouse gas mitigation benefits over a longer period. Additionally, these forest management activities lead to carbon stored in durable wood products,

which the Forest Service states that "more than 2,600 million metric tons of carbon was stored in harvested wood products in the United States" in 2015. Forest management may also be able to reduce carbon losses associated with disturbances. Wildfire in particular is an increasingly substantial source of carbon dioxide and other greenhouse gas emissions. Recent research indicates that the macro-scale dynamics of carbon uptake and storage cycles function at the watershed level as well. National Forest Foundation researchers modeled fuels treatments and likely emissions on the Cragin Watershed on the Coconino National Forest in Arizona. They found that restoration treatments "prevent the loss of forest carbon from high-severity fires and help secure existing carbon in healthier, more resilient forests," and that any short-term carbon loss from management is "temporary as the trees remaining in restored stands continue to sequester carbon."

Fuel-reduction treatments can lower the risk of crown fires, which are more likely to lead to intense wildfire conditions that cause substantial carbon losses. Fuel-reduction treatments create carbon benefits over time by increasing the growth of the residual stand and reducing the risk of high-severity, stand replacing wildfire. Fuel-reduction treatments may have the most substantial carbon benefit when thinnings provide wood for energy or products for long-term substitution.

An example of a project with carbon benefits is the Cragin Watershed Protection Project ("Cragin Project"). The Cragin Project area is currently overgrown and filled with unhealthy and small diameter trees that create fuel for large catastrophic wildfires. The Cragin Project area has a very high risk of high-severity wildfire that would have devastating effects on Reclamation-owned water infrastructure and could impair SRP's ability to provide reliable water supplies to the Phoenix Metropolitan Area and other communities that rely upon this water source. The Cragin Project goals are to set the forest on a positive trajectory by removing hazardous fuels and restoring forest structure, composition, and function. Losing the forest within the Cragin Project area to

catastrophic wildfire would produce large amounts of carbon dioxide and other greenhouse gases that are emitted during wildfires. After a landscape is lost to wildfire, it no longer acts as a natural carbon sink for decades and turns the forest into a carbon emitter with dead and decaying material. Restoring the Cragin Project area has been shown to create net positive carbon benefits. Cragin Project thinning treatments are initially expected to reduce above-ground carbon storage through the removal of many small diameter trees from fuels reduction, thinning, and prescribed fire activities. This loss of carbon is temporary as the trees remaining in restored tree stands will continue to sequester carbon. Restored acres are also at a lower risk of experiencing high-severity wildfires and carbon reversals.

Federal actions like this one that aim to preserve these vital carbon stores may actually pose an increased threat to their maintenance and survival if the actions slow or stop the pace and scale of forest thinning efforts in the Western United States. To prevent large-scale, catastrophic wildfires from continuing to occur throughout the West, significant thinning is necessary, some of which may include the thinning of trees considered to be old growth. A recognition both of the danger posed by wildfire, and of how stand density today differs from historic conditions, should guide the Forest Service in its decisions to amend forest plans.

VI. CONCLUSION

Generally, SRP appreciates the Forest Service's perspective to protect and promote old-growth forest conditions. Unfortunately, the Forest Service's current approach is not compatible with MUYSA, the original intent of forest reserves, and limits the effectiveness of the Wildfire Crisis Strategy. SRP respectfully requests the Forest Service to incorporate SRP's recommendations into the upcoming old-growth environmental impact statement and any additional standards, guidance, and policies. Please feel free to contact me if you have any question regarding our comments or

recommendations at elvy.barton@srpnet.com or 602-236-5104.

Sincerely,

Elvy Barton

Water and Forest Sustainability Manager

Salt River Project

ATTACHMENT: USFS NOI EIS Old Growth 02-02-2024.pdf - Comments copy/pasted into text box; coded/completed.