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Organization: Boise Forest Coalition

Title: Steering Committee member

Comments: RE: Forest Service, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Please accept the Boise Forest Coalition's scoping comments regarding Forest Service, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Notice of Intent to Prepare an Environmental Impact Statement, 88 Fed. Reg. 88,042 (Dec. 20, 2023) (NOI). In September 2010, the Boise Forest Coalition (BFC) was formed to bring together diverse interests who could craft recommendations for multi-faceted forest management projects. The mission of the citizen-led Boise Forest Coalition is to provide the Boise National Forest with management recommendations that:

1. Are developed through consensus decisions involving all members of the Coalition;
2. Address natural resource, economic, recreational, and societal needs;
3. Are compatible with Forest Plan direction including implementation of the Forest's Wildlife and Aquatic Conservation Strategies;
4. Are economically realistic;
5. Promote future collaboration during implementation and monitoring.

The BFC's objectives include the following:

- * Restore forest and ecological health
- * Reduce forest fuel hazards
- * Create economic opportunities
- * Produce forest products
- * Protect designated Idaho roadless areas
- * Enhance bull trout habitat and connectivity
- * Maintain and enhance fish and wildlife habitat
- * Provide a variety of trail-related recreational pursuits
- * Improve management of recreational uses to better address impacts on natural resources
- * Provide dispersed camping and wildlife-related opportunities
- * Coordinate with adjacent land

The BFC seeks to provide consensus-based recommendations for these undertakings, track projects through implementation, and is committed to working with the Forest Service to achieve joint goals that improve, manage, protect and restore the Boise National Forest.

We understand that the United States Department of Agriculture is planning on updating all 128 Forest Plans across the United States with the following intent:

to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition across planning areas of the National Forest System. The intent is to foster the long-term resilience of old-growth forest conditions and their contributions to ecological integrity across the National Forest System.

Per Executive Order 14072, the Forest Service recently conducted an initial analysis to define, identify and

inventory mature and old-growth forest conditions for over 200 regional vegetation types. This review resulted in following important findings:

The initial analysis found that mortality from wildfires is currently the leading threat to mature and old-growth forest conditions, followed by insects and disease. The analysis found that tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects and disease. However, past management practices, including timber harvest and fire suppression, contributed to current vulnerabilities in the distribution, abundance, and resilience of old-growth forest characteristics.[1]

We appreciate the Forest Service's recognition that wildfire, insects and disease and not commercial harvest, poses the biggest threat to mature and old growth trees. We note that over half of the Boise National Forest is currently departed from natural fire regimes. The Boise National Forest has recognized this and is significantly increasing efforts to reduce the threats that uncharacteristic wildfire, insects and disease pose to forests, watersheds, and local communities.

The lack of clarity to date regarding mature and old growth definitions, inventory, and acceptable treatments has hampered a wide range of forest management activities. In some cases, actions that were neutral or even beneficial for old growth forests have not occurred because of this long-standing ambiguity.

The Boise National Forest is a diverse forest, ranging in elevation from 2,800' to almost 10,000' and covering over 2,600,000 acres of southwestern Idaho. We encourage the Forest Service to use local, ecologically-appropriate definitions for mature and old growth forests as per the relevant Potential Vegetation Groups.

Many of the Boise's remaining mature and old growth forests are within Inventoried Roadless Areas where management is guided by the Idaho Roadless Rule and treatments are limited and infrequent by design.[2] We encourage the Forest Service to examine low-intensity treatments in and around existing old growth stands in Inventoried Roadless Areas (IRAs) when possible as part of maintenance and recruitment efforts.

The remainder of the Boise National Forest's mature and old growth forests are outside of IRAs. Because a percentage of the historic old growth has been harvested in previous decades, mature and old growth is generally underrepresented. Recent silvicultural prescriptions have emphasized the retention of these trees. However, many of these areas are overstocked with shade tolerant trees because of decades of fire suppression and lack of recent active management. These unnaturally dense stands can pose a risk to the remaining old growth trees and slow the recruitment of future classes of old growth. Because of the larger range of treatment options outside of IRAs, these landscapes have the biggest potential to protect existing old growth as well as recruit future mature and old growth trees, while still contributing to rural economic stability.

Major forest policy decisions should be accomplished through robust local engagement and public participation. Our National Forests are dynamic systems, not static. While these amendments are being initiated from Washington, D.C. each National Forest is geographically and ecologically unique and requires a different approach based on local conditions. The Forest Service and the public would be best served through individual plan revisions and amendments at the Forest and Regional levels.

We encourage the Forest Service to utilize the most recent, site-specific data on the Boise National Forest regarding the current inventory of existing mature and old growth and the potential for future recruitment. The Forest Service should accompany this with an evaluation of the risks to each stand. We recommend that the Forest Service factor in the dynamic nature of forest ecosystems and focus not just on preservation but also consider resistance to disturbance, resilience from disturbance, and stand succession.

Based on this risk assessment, we recommend updating the Forest Plans to reflect the most appropriate

management options for these stands as well as recommend a maintenance schedule for future treatments. The Forest Service should refine these amendments with input from local communities and make a commitment to monitor forest conditions and report back to the communities on the implementation and effectiveness of this approach towards preserving old growth and associated values.

We believe that stewardship of mature and old growth stands and recruitment of future stands can be accomplished through proactive active management measures such as thinning and/or prescribed fire. Based on our previous experiences working with the Boise National Forest on integrated restoration projects, we believe that these treatments can also be designed to complement hazardous fuel reduction efforts around communities, restore water quality and wildlife habitat, and improve recreation management.

We recommend that the Mature and Old Growth Forest Plan amendments are implemented in a manner that improves the resiliency of existing mature and old growth stands, protects the related ecosystem and social values, charts a clear path for stewardship of future mature forests, and benefits the communities that rely on our forests.

On Behalf of the Boise Forest Coalition,

ATTACHMENT: BFC Old Growth amendment comments.docx - Comments copy/pasted to text box; coded/completed.