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Comments: WASHINGTON DEPARTMENT OF NATURAL RESOURCES

Forest Resilience Division
September 12, 2024Director, Ecosystem Management Coordination201 - 14th Street SW, Mailstop 1108Washington, DC 20250-1124RE: Old Growth DEISDear Secretary Vilsack,Please accept this comment letter on behalf of the Washington State Department of Natural Resources (DNR). DNR's mission is to manage, sustain, and protect the health and productivity of Washington's lands and waters to meet the needs of present and future generations. Washington's Commissioner of Public Lands, who leads DNR, is designated as the state lead for all forest health issues (RCW 76.06.150).DNR is a partner in Shared Stewardship with the USDA Forest Service. Our agencies are working extensively together to plan, implement, and monitor forest management and restoration projects on National Forest System lands in Washington State. Forest Service stewardship and management decisions play a critical role in achieving the goals identified in the Washington State Forest Action Plan, 20-Year Forest Health Strategic Plan: Eastern Washington, and Shared Stewardship Investment Strategy, among many other federal and state strategic initiatives. In brief, our partnership is critical to achieving our agency's mission and to serve the lands, waters, and communities of Washington State.Washington State has a deep history of science, policy, and stakeholder engagement around old-growth and mature forests. This letter builds upon our July 2022 response to the Forest Service's Request for Information to inform your response to the Executive Order, Strengthening the Nation's Forests, Communities, and Local Economies. As you prepare the Final EIS and Record of Decision, we encourage your office to consider the following regarding Alternative 2:Washington State Department of Natural Resources supports Alternative 2 Modified Proposed Action (Preferred Alternative)Washington DNR is writing to offer our support for Alternative 2 Modified Proposed Action (Preferred Alternative). From the DEIS "[t]his standard, along with NOGA-FW-STD-02a, ensures that the sole purpose of proactive stewardship will be to promote the composition, structure, pattern, or ecological processes necessary for old-growth forests to be resilient and adaptable to stressor and likely future environments. This alternative, within the scope and scale of the amendment, is intended to further land management plans toward ecological integrity for old-growth forests and is anticipated to have a net-positive effect on the extent of old-growth forests and upon associated species, habitats, and ecosystem services. Given the combination of NOGA-FW- STD-03 and the preservation of all management tools that could help implement proactive stewardship activities, including commercial timber harvest, Alternative 2 is anticipated to lead to the achievement of desired conditions at the fastest rate." The Preferred Alternative accurately represents the need for science-based restoration and management in old growth to ensure the conservation of threatened forest ecosystems to wildfire, drought, and insects and disease.In Washington State, over 100,000 acres of old-growth forest have burned at high severity in the Eastern Cascades over the last twenty years. Accelerating the implementation of mechanical forest restoration treatments and prescribed fire treatments will be critical to conserving remaining old-growth forests in eastern Washington. In Western Washington, National Forests have not managed old-growth forests for timber production since the adoption of the Northwest Forest Plan. The proposed action alternative would formally update the Land Management Plans of Western Washington's National Forests to ensure management direction in existing old growth is to maintain old growth conditions that are ecologically appropriate and resilient to disturbance and future stressors.Forest Service CapacityThe successful implementation of this amendment will depend upon clear interpretation of the amendment within the framework of Land Management Plans and integration of it into future updated Land Management Plans. Technical assistance from the regional and national level to individual National Forests should be provided to help evaluate existing Land Management Plans, train staff and support consistent interpretation at the project-level, ensure stakeholder engagement and outreach, and provide draft language for the update of Land Management Plans. This added technical assistance support for local units will reduce potential impacts on the urgent task of planning and implementing existing forest restoration and wildfire risk reduction projects. This assistance for local units will be especially appreciated in the

Pacific Northwest, where this amendment will coincide with the Northwest Forest Plan (NWFP) amendment process. The consistent interpretation of this policy relative to the NWFP amendment and existing Land Management Plans is complicated and will require the assistance of Regional and Washington Office staff to be successful.Interim Review ProcessClear guidance to National Forest units about how to incorporate old-growth into project planning during the time between the Final EIS and when each local Adaptive Strategy for Old-Growth Forest Conservation plan is developed will be important. Currently, it is unclear how local units will comply with the NOGA policy prior to the respective local Adaptive Strategy for Old-Growth Forest Conservation being finalized. Clarity will ensure we do not see delays in implementing important projects on the ground that meet our shared strategic plan goals. This concern is in response to observations from our staff in real-time project planning impacts in place while this policy has been in development including priority restoration work being dropped from proposed actions due to local forest level perceptions on potential results and/or the timeline and process for review.National Forests in Region 6 currently have a robust policy framework that prevents the cutting of old growth forests and old growth trees and resilience projects routinely occur that plan within areas of old growth while maintaining important protections. Recent monitoring conducted by our agency confirms that current landscape-level restoration efforts are not reducing large-tree structure. The Forest Service's 10-Year Wildfire Crisis Strategy and many state-level plans such as the Washington's 20-Year Forest Health Strategic Plan, lay out ambitious goals for restoration work and we ask that the review process and interim direction to implement this policy is mindful of and clearly communicated to facilitate the ongoing needed work to achieve the goals of the policy: conserving our old forests by making them more resilient to wildfire and climate change.Mature ForestsThe EIS states, "[n]ot all mature forest occurs in areas that will persist as mature forest or that can sustain succession towards old-growth forest. Past management - such as fire suppression, previous vegetation management, and/or reforestation - and natural succession or regeneration may have created mature forest or species distribution/composition that does not support desired ecological functions and conditions[hellip]. For these reasons, mature forest is not being included in conjunction with old-growth (e.g. "old-growth and mature forest") for all aspects of the amendment." (p. S-5).DNR agrees with the Forest Service decision to limit the scope of the EIS to old growth. Mature forests comprise an estimated 47% of Forest Service lands and exhibit a wide range of existing conditions. Defining the characteristics of "mature" will be significantly more complicated than defining old growth for the purposes of this EIS. Mature forest management decisions can be better addressed through management plans and policies as well as project implementation at the regional and local scale.Management Approach 1.b states, "[i]dentify areas that have the inherent capability to sustain future old-growth forest (i.e. areas of likely climate or fire refugia) over time and prioritize them for proactive stewardship for one or more of the following purposes" (p.23). We agree with the intent of this statement, but as mature forests are not within the scope of the EIS it seems important to indicate what management standards and guidelines would be used to promote proactive stewardship proposals in these areas and whether those standards and guides should be included in the Adaptive Strategy for Old-Growth Forest Conservation.Resilience to Drought and Climate Change AdaptationThe Threats Assessment associated with this process found that wildfire, insects, and disease - disturbances exacerbated by anthropogenic climate change - are the most significant threats leading to the loss of old-growth forests. The affected National Forests in Washington State include the Olympic National Forest, Mt Baker-Snoqualmie National Forest, Gifford Pinchot National Forest, Okanogan-Wenatchee National Forest, Colville National Forest, and Umatilla National Forest.Drought poses a significant threat to old growth forests and trees that will exacerbate the impacts of other disturbances in both the wet and dry forests of Washington. DNR encourages the Forest Service to account for drought and drought-related mortality explicitly in the EIS and associated analysis to determine what, if any, appropriate management actions may be needed to enhance the resistance and resilience of old growth. The inclusion of drought and climate change adaptation should be added under Standard 2.a (p.29) as rationale for proactive stewardship, especially in fire-prone old-growth forests.Over the past decade, the Forest Service and partners in states have been coordinating to promote drought resilience nationwide including through the National Drought Resilience Partnership that built upon the 2016 Drought Science Synthesis (Vose et al. 2016). Subsequent Forest Service led workshops across the country worked to build organizational capacity to address the effects of short- and long-term drought on forest and rangeland resources to inform land management, restoration, and climate change adaptation. In Region 6, DNR refers to the synopsis from the 2017 workshop held in Portland, Oregon

often with reference to the management response options for forests.Categorization of National Forests and Addressing Integration of this Amendment with Northwest Forest PlanIn Appendix C of the DEIS, all National Forests in Washington State are ranked as Category 3 in the internal Forest Service review, which states that "[i]f the unit has some plan components (e.g. desired conditions, objectives) but does not have standards/guidelines that constrain management activities in old growth - or these do not apply forest-wide or are not as restrictive as the proposed NOGA standards - this unit is anticipated to experience noticeable change in terms of old growth plan direction".The ranking and determination that management of Washington's national forests will "experience noticeable change" seems misleading when considering the Threats Assessment, region and forest-level policies and land management plans in place, and realities of on-the-ground management and planning. The Northwest Forest Plan, Survey and Manage requirements, Endangered Species Act critical habitat designations, individual forest management plans and forest-level policy (i.e. Okanogan-Wenatchee Forest Restoration Strategy), Management Direction for Large Diameter Trees in Eastern OR and Southeastern WA, and relevant law, regulation, and policy has resulted in a shift in management focus in Washington that is aligned with the direction in the proposed Alternative 2. In the dry forests of Eastern Washington, restoration treatments are common in stands with old trees, while in western Washington management has been appropriately focused on stands outside of old-growth. As described, the Categorization does not adequately seem to account for existing protections and planning realities in Washington's National Forests. We request greater detail in this Appendix (or referenced material specific to National Forests) on what is meant by "noticeable change" to both inform interpretation of this decision and to set shared expectations.Additionally, the final Old Growth Amendment EIS should provide clear guidance on the relationship between the Northwest Forest Plan and the National Old Growth Amendment. As the timing of this amendment and revision of the Northwest Forest Plan are closely aligned, it will be important for all forests within the range of the Northwest Forest Plan to understand how to translate and operate under these two policies including clear direction on where they are aligned, and which policy takes precedence where they are not aligned. This includes specifying whether the Northwest Forest Plan could serve as the Adaptive Strategy for Old Growth Conservation for National Forests within the Northwest Forest Plan area.Accelerate Dry Forest Restoration to Conserve Old Growth Trees and ForestsMany old growth forests in Washington State have been affected by fire exclusion, which is supported by the Threats Assessment findings that wildfire and insects and disease are the leading cause of the loss of old-growth forests. In most cases, effectively restoring old-growth forests in dry, frequent-fire forest ecosystems will require removal of commercial sized trees. The amendment should emphasize the need for proactive stewardship in frequent-fire systems to foster improved resistance and resilience of fire-dependent old growth trees and forest ecosystems.The language in Standard 3 is redundant with the provisions described in Standard 2. In dry, frequent-fire forests, commercial thinning is recognized as a critical management tool to meeting the goals of the Executive Order. Standard 3, as written, may lead to confusion among land managers and the public. The EIS currently states, "[t]his alternative prohibits proactive stewardship in old-growth forests for the purpose of timber production." The document then goes on to state that where appropriate the EIS will support "the preservation of all management tools that could help implement proactive stewardship activities, including commercial timber harvest" (p. S-11). It will be important to provide clear guidance accompanied by technical assistance to forests to facilitate how agency personnel determine which old-growth forests are appropriate for restoration treatments that involve the use of commercial thinning to remove mature and young trees?Further, it is unclear whether Standard 3 would allow or limit timber production via the establishment of temporary roads through old growth stands to access plantations or other restoration sites. Under what conditions and standards would it be appropriate to reconstruct a temporary road on a previous roadbed to conduct proactive stewardship or active management adjacent to old growth stands?Wildland Urban Interface and Strategic Hazardous Fuels ReductionDNR appreciates the clarification added regarding Wildland Urban Interface (WUI) and support to conduct fuels management in old growth forests in municipal watersheds and to protect critical infrastructure. Under Standard 2.c.i (p. 31) the EIS should clearly define "critical infrastructure." Specifically, the definition should ensure that critical infrastructure such as electrical grid infrastructure, highways, bridges and tunnels, railways, cell phone and communication towers, historic structures, recreation infrastructure, and irrigation infrastructure are eligible for protection and treatment.DNR supports the inclusion of explicit language to promote fuels management in old-growth forests within wildland-urban interface and near values at risk. In Washington

State, potential operational delineations (PODs) and potential control lines (PCLs) have also been identified based on their likelihood of supporting successful fire management and suppression operations. In some cases, it may be necessary to conduct fuels reduction treatments in old growth in PODs and along PCLs. Reducing hazardous fuels while retaining old trees along these prioritized lines in old-growth stands, where appropriate, to meet landscape resilience and wildfire resilience objectives should be considered as part of the EIS.Land Management PlansBased on the information provided in the EIS, Forest Service Land Management Plans will be updated to include consistent information about the stewardship of old growth including "statement of distinctive roles and contributions, goal, management approach, desired conditions, objectives, standards, guidelines, and plan monitoring requirements."The DEIS recognizes that "[b]ecause the old-growth amendment adds but does not remove content from existing plans" there is a need "to provide direction on how units should proceed when aspects of plan direction for old-growth are not in clear alignment", DNR encourages more direction and clarification than what is provided to avoid confusion during implementation. The current Guideline 2 (p. 34) states that "[w]here there are additional land management plan components for old-growth that existed prior to the old-growth amendment, and these provide more restrictive direction for old-growth forests, the more restrictive direction should be adhered to." Many Land Management Plans in Washington were written in the late 1980's and early 1990's, and therefore do not integrate the best available science including critical adaptations to climate change. Land management plans are required by the National Forest Management Act for each National Forest or grassland and should be updated every 10 to 15 years. We request that the Forest Service include in the decision an intention that all National Forests that have land management plans beyond their life cycle that require an update must outline a schedule for when the update will initiate and complete. In the meantime, to prevent confusion the DEIS should include specific examples of more restrictive language from relevant Land Management Plans. The clarification should also address what occurs when future Land Management Plans and policies, such as the amended Northwest Forest Plan, may not be in alignment with the intent of the Executive Order.TimberThe EIS states, "[t]he Proposed old-growth amendment does not change lands suitable for timber production." This statement does not fully account for the impacts of the Executive Order on old growth forests within Matrix and Adaptive Management Area land allocations originally identified by the Northwest Forest Plan as available for harvest. This amendment formally adopts the existing practice of not conducting harvest in these areas, which is aligned with current management realities and public support for old growth conservation. The affected Matrix and Adaptive Management Area lands should be described and incorporated into the final analysis.National Forests comprise more than half of the forestlands in Washington State. Timber production and responsible stewardship of those lands is critical to maintaining forest products infrastructure in Washington.Mapping Old GrowthDNR encourages the Forest Service to consider how this policy will be operationalized by forest and district-level staff in future vegetation management projects. Identifying old growth is not a desk exercise and identifying in public documents areas of "old growth" without field validation will complicate future vegetation management projects. Remotely sensed data can be helpful in identifying potential old-growth, however these tools alone are inadequate to understand the complexity of an individual tree or potential old growth stand. Mapping and field validating old growth is a significant commitment of staff resources and capacity. This is a key issue that should be addressed in the EIS and local adaptive strategies.DNR encourages the Forest Service to integrate considerations for mapping and identification of old growth into the EIS and adaptive strategies, which should contain:

1. Local definitions of old growth conditions and protocols for mapping that include field validation prior to areas being dropped from vegetation management projects and/or proposed future treatment.
2. Field validation, for example through typical stand exams conducted for a project, should not add significant extra planning time for projects. The EIS and adaptive strategy should contain clear guidelines and rules that promote proactive restoration and stewardship to ensure conservation of old growth in fire dependent ecosystems (e.g. dry forest restoration treatments).
3. Intensive mapping and field validation should only be required in certain situations that are likely to result in old-growth trees being cut, for example in the case of public safety.

Tribal and Treaty RightsDNR supports tribal co-stewardship with the Forest Service and management of old growth to meet obligations associated with Tribal and Treaty Rights that support cultural uses.Post-Disturbance Management and RestorationThe EIS is silent on the topic of post-disturbance management and restoration. The

Threats Assessment found that millions of acres of old growth forest have been affected by wildfire, drought, insects, and disease, and other natural disturbances, which are projected to increase with climate change. The EIS should discuss the potential socio-ecological benefits and climate adaptation need for management of old-growth forests following disturbance. For example, hazardous fuels reduction and/or tree planting may be warranted in old growth forests after a major disturbance to sustain the surviving old growth trees and promote climate adapted species. Ideally, the EIS would lay out a framework for post-disturbance management that is consistent with this policy. The purpose of proactive stewardship is to promote the composition, structure, pattern, and ecological processes necessary for forests to be resilient and adaptable to stressors and likely future environments.Monitoring and Adaptive ManagementEstablishing a national old-growth monitoring framework is a stated goal of this process. DNR is encouraged by this prospect and respectfully requests that the Forest Service leverage the expertise of existing monitoring programs and partnerships to meet the intent of this amendment. Part of the adaptive management process is applying this work on the ground and learning from your staff and partners in a place-based setting.DNR welcomes the opportunity to partner in the implementation of the FEIS and decision through our shared stewardship partnership with National Forests in Washington State.DNR welcomes the opportunity to partner in the implementation of the FEIS and decision through our shared stewardship partnership with National Forests in Washington State.Sincerely,George GeisslerState Forester and Deputy Supervisor for Wildland Fire ManagementATTACHMENT: 9.2024_DNR Comment Letter_OldGrowthDEIS.pdf - this is the same content that is coded in text box; it was originally only included as an attachment"