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Director Walker,

The Idaho Department of Lands (IDL) appreciates the opportunity to comment on the USDA Forest Service's Draft Environmental Impact Statement (DEIS), proposing alternatives for managing old-growth forests on 122 national forests. IDL understands that the primary intent of these proposed national-forest land management plan amendments is to foster long-term resilience of old-growth forests and their contributions to ecological integrity across the National Forest System.

Idaho's vast and diverse forests are critical to our state's environmental health and economic vitality. In fact, it is specified in the Idaho Constitution that the state's public trust lands shall be managed in a manner to "secure the maximum long term financial return" to the trust beneficiaries. As stewards of these state trust lands, IDL is obligated to monitor forest growth and inventories, compare silvicultural practices and harvesting practices, and synthesize a myriad of data to ensure continual "long-term" forest health and vigor—thus, IDL recognizes the need for a balanced approach that sustains both ecological integrity and economic viability.

Idaho contains 20 million acres of forestland managed by seven national forests, of which 6.1 million acres have been designated by the USDA as being at high risk from forest pathogens, diseases and high-intensity wildfires. Of Idaho's seven national forests, six have active agreements with IDL to increase the pace and scale of needed fuel reduction and active management on federal forestlands using IDL's Good Neighbor Authority (GNA) program. Because the USDA has recently designated three Wildfire Crisis Strategy (WCS) landscapes which are at least partially contained in Idaho, Idaho's national forests have worked collaboratively with IDL's Shared Stewardship program, GNA foresters, and local organizations for years to prioritize cross-boundary fuel-break projects throughout these WCS designations to reduce the threat of wildfire damage to many at-risk communities and vulnerable critical infrastructure.

In 2023, a Wildfire Roundtable was assembled by the Governor of Idaho to address specific issues relating to increasingly severe and damaging wildfires in our state. Last month, ten actionable recommendations were generated by this group, of which three specifically mentioned the need to support and increase vegetation

management, fuels-reduction and wildfire mitigation measures on our forestlands to mitigate damage to Idaho's communities, personal property and electricity-transmission infrastructure. Keeping these fuels-reduction and forest-health-enhancing treatments at the top of the national forests' priority list is critical to the long-term resilience and sustainability of all of Idaho's forests[mdash]including those classified as old-growth.

As a result, IDL urges the USFS to reconsider the current proposal of amending 122 National Forest Land Management Plans through a single EIS. Within the context of the Forest Service's intent to implement one of the alternatives in this draft EIS, IDL supports the USFS's clarification in the DEIS that "the Modified Proposed Action (Alternative 2) and the Less Restrictive Alternative (Alternative 4) do not contradict the Wildfire Crisis Strategy" (Section 2.3.2, page16). IDL appreciates the language that has been added to Standard 2.a.i in the Modified Proposed Action to clarify that management actions are permitted[mdash]and encouraged[mdash]for the reduction of hazardous fuels to reduce the risk of loss of old-growth forests to uncharacteristic wildfire, and that when appropriate, commercial timber harvest is included in the silvicultural tools that can reach those fuels-reduction goals. For these same reasons, IDL strongly opposes Alternative 3.

Of the alternatives, IDL understands the plan components identified in the Modified Proposed Action (Alternative 2). Specific points of agreement and concern include:

[bull] Management Approach 1.b., page 23: There is a concern that the USFS's discernment of forest units that may have the "inherent capability to sustain future old-growth forest[hellip]over time" could be ambiguous, subjective and susceptible to capricious designations of "future old-growth" areas, leading to a lack of focus on and prioritization of overarching fire behavior-changing and forest-health-improving treatments being implemented to increase long-term resilience.

[bull] Desired Conditions 3 and 4, page 26: There is understanding for the need to recognize the myriad of ecosystem services provided by old-growth forests[mdash]and IDL supports the addition of language recognizing "the other successional stages that are also necessary for ecological integrity." In light of research that shows younger forests have a greater capacity to accumulate and capture carbon than previously thought[mdash]and that natural forest regeneration could be a strategy to help fight climate change[mdash]there is a need to describe more benefits offered by other successional stages of forest development. [1,2]

o This description of carbon sequestration and accumulation by younger successional stages of forest development could be further enhanced in the "Carbon" section on page 75.

[bull] Objectives 1 and 2, pages 26 and 27: There is a concern that the collaborative effort required by this objective to develop an "Adaptive Strategy for Old-Growth Forest Conservation" within two years of this amendment's ROD[mdash]and corresponding quick initiation of proactive stewardship projects[mdash]will pull cooperating partners (State, Tribes, Counties, NGOs, private landowners) away from successful Shared Stewardship cross-boundary projects, currently addressing wildfire and forest-health issues on and adjacent to the national forests.

[bull] Standard 1, page 28: There is support for letting the national forest land management plan (LMP) be the guiding document for old-growth forest determinations. IDL suggests that if a national forest's LMP is found to be "incomplete" in defining old-growth forest, then the national forest's silviculturists, as well as the regional silviculture program, determine the criteria that define old-growth forest in any single national forest. Broad applicability of old-growth, or future old-growth, definitions, even over an entire region, may overlook the unique characteristics and needs of the different Idaho forest ecosystems that national-forest managers are most familiar with.

[bull] Standard 2.a, page 29: There is agreement with this standard that defines "proactive stewardship" to potentially include fuels-reduction and forest-health resilience objectives using prescribed fire, timber harvest and

other mechanical treatments to achieve these silvicultural objectives. There are concerns with the subjective and inconsistent definitions of the "accurate" patch size, number of downed logs, stem distribution and species composition in an old-growth forest. [bull] Standard 2.c, page 31: There is general support for this standard, allowing deviations and incidental tree removal in cases where other standards would preclude achievement of wildfire risk management objectives in the WUI, or would prevent protection of critical infrastructure from wildfire. Again, IDL supports management objectives that prioritize wildfire risk-reduction projects and activities.

[bull] Standard 3, page 32: Recognizing the national forests' needs to list the primary purpose of a project being forest health enhancement, fuels reduction or habitat enhancement[mdash] IDL wishes to stress the importance of the state's vibrant milling industry[mdash]and the critical need for a long-term sustainable and consistent supply of wood to meet the timber industries' needs. Idaho communities and local economies depend on this, as well as enduring funding streams to support these badly needed non-merchantable fuel breaks across forestland boundaries.

[bull] Section 3.2-Affected Environment, Vegetation Management, Carbon, Succession and Climate Change sections, pages 74-77: There is agreement for the emphasis on silvicultural approaches aiding "in restoring old-growth attributes by mimicking natural forest dynamics and promoting structural complexity and biodiversity." Active management, such as thinning, mastication and prescribed fire can accelerate tree growth and make a forest less susceptible to wildfire damage[mdash]all important factors in meeting a goal of long-term forest resilience.

[bull] Section 3.2-Affected Environment, Fire Policy section, page 81: There is support for recognizing the need and prioritization of the USDA Forest Service Wildfire Crisis Strategy as the guiding goals to deal with the "crisis" of increasing severity and frequency of wildfires in the West[mdash]and the corresponding development of, and Congressional financial support for, thousands of acres of cross-boundary proactive vegetation management in Idaho.

[bull] Section 3.3-Environmental Effects, Ecological Consequences Common to All Alternatives section, page 99: There is strong consensus with the paragraph that states, "Modifying fire behavior will remain a priority in the WUI, which is typically, but not always, compatible with stewardship of old-growth ecosystems." Recognizing that approximately 25% of old-growth is in WUI areas, it is critical that fire-risk mitigation projects take priority when deciding on active-management alternatives in high-risk areas. All stages of forests, including old-growth, will most benefit from risk-reducing vegetation management projects.

IDL will continue to work collaboratively with the USFS to best reach our mutual long-term forest-resiliency goals[mdash]on and around Idaho's national forests. Adhering to the interagency, locally derived fire-risk reduction strategies developed and implemented in Idaho's three WCS designations, we will continue to coordinate with multiple national forests to grow and expand our needed cross-boundary work. Because of Idaho's success with project implementation across multiple ownerships, and the building of trusting relationships between the USFS, IDL and local county governments and organizations, we strongly encourage the USFS to leave management decisions with local Forest Service offices (Forest and District level), where staff are intimately familiar with Idaho's unique forest conditions, forest health issues and strong local relationships.

Mitigating wildfire risks and maintaining a thriving timber industry market are IDL's biggest issues here. IDL has concerns with how the proposed amendment will negatively affect the supply of timber supporting Idaho's milling infrastructure. IDL continues to advocate for keeping the old-growth definitions, delineations and standards specific to the expertise of the national forest. Proper active management of old-growth forests can reduce the likelihood of catastrophic wildfires, which threaten human life, property, and the survival of old-growth forests. IDL advocates for a plan that incorporates active management strategies[mdash]including controlled burns, thinnings and selective logging[mdash]to enhance the health, vigor and resilience of all of Idaho's forests.

Sincerely,

Craig Foss

State Forester

Idaho Department of Lands

cc: Jamie Neill, Policy Director, Idaho Office of the Governor Jace Hogg, Federal Lands Coordinator, Idaho Governor's Office of Species Conservation, Dustin Miller, Director, Idaho Department of Lands

1/ Natural Forest Regrowth and Carbon Capture | World Resources Institute (wri.org)

2/ Gray, A.N., T.R. Whittier, and M.E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224.)

ATTACHMENT: IDL Comment Letter to USFS Re Old-Growth LMP Amendments_09-17-24.pdf - this is the same content that is coded in text box; it was also included as an attachment