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Comments: TO: U.S. Forest Service

RE: National Environmental Policy Act process to develop an Environmental Impact Statement for the proposed amendment intended to provide consistent direction to conserve and steward old-growth forest conditions in response to rapidly changing climate conditions.

Date: September 19, 2024

Given the circumstances associated with fire suppression over decades, (e.g. increased stand density) and climatic shifts, habitat settings are vulnerable to fires of larger size and severity. Forests in the late- mature to old-growth stage and the species these forests support, are vulnerable to reduction in geographic extent if not extirpation in some settings.

I am glad the US Forest Service is addressing this concern, as many of these late-mature and old-growth forests (as well as even early successional habitats) are out of sync in terms of the historic fire return interval which would occur at a frequency and severity at which the forests are adapted to burn:

"In stands that have missed several fire cycles and are compromised both structurally and compositionally, severe wildfire will likely reset these communities to an early seral state that could persist if stressors such as climate and recurring high-severity fire arrest the development of the site (USDA 2022)."[1]

I support the "pro-active stewardship" as defined in the document as: "[hellip]vegetation management that promotes the quality, composition, structure, pattern, or ecological processes necessary for old-growth forests to be resilient and adaptable to stressors and likely future environments". I also support the context provided in the following direction of the Modified Proposed Action to clarify that management actions are permitted for the reduction of hazardous fuels to reduce the risk of loss of old-growth forests to uncharacteristic wildfire, and to facilitate the return of appropriate fire disturbance regimes and conditions. As long as the pro-stewardship actions are consistently guided by scientific ecological knowledge as well as the incorporation of indigenous knowledge where it blends, pro-active stewardship has an important place in the amendment.

With that said, my comments to the EIS and the associated amendments to the modified preferred alternative are oriented around the following items:

1. the language used and/or phrasing added doubts to the application of pro-active stewardship as defined above, and revealed inconsistencies in its application within the document if not an avenue to disturb old-growth forests to meet other objectives thus shedding doubt on the driver/the intent of pro-active stewardship,
2. the exclusion of "mature" forests, not just old-growth forests, in the preferred alternative fails to recognize that loss of forests in late-successional stages would compromise the sustainability of old-growth forests in the future,
3. the importance and thus the promotion of stewardship activities that are not limited to a respective Forest boundary, but take a borderless approach for project design as much as possible,
4. I didn't see any recognition of wildland fire use for those geographic settings that have been subject to pro-active stewardship yet in some settings, it could be a restoration tool.
5. I also did not find any reference to the Northwest Forest Plan which is oriented around the conservation of late-successional forest.

Following are sections of the document that corroborate my aforementioned concerns associated with the

preferred alternative.

1. Timber Harvest as Pro-Active Stewardship

This statement/phrase "commercial timber harvest" is inconsistent with the overarching objective "to promote the composition, structure, pattern[hellip]..for old-growth forests[hellip]." If the prescriptions of pro-active stewardship to restore the ecological integrity warrants tree removal, that should be the term used not "commercial timber harvest". While the trees removed may have commercial value, this is a by-product of the prescription, NOT an objective. As written in various places throughout the document, "commercial timber harvest" is portrayed as a pro-active stewardship activity[mdash]the objectives are different. The pro-active stewardship actions are driven by science and incorporate traditional ecological knowledge where applicable, NOT for commercial timber harvest purposes.

Following are phrases in the document that raise some questions about the intent:

- * "Timber harvest is one of the tools used to meet a wide variety of land management objectives, including fuels reduction, carbon sequestration, wildlife habitat enhancement, and scenery management", then,
- * The amendment[hellip]" would prohibit vegetation management within old-growth forest conditions when the purpose is to grow, tend, harvest, or regenerate trees for economic reasons." Likewise, relative to the reason why alternatives were developed, specifically Standard 3 it states that the action "restricts pro-active stewardship in old-growth forests for the purpose of timber production".
- * Relative to Alternative 2: "This alternative prohibits pro-active stewardship in old-growth forests for the purpose of timber production (NOGA-FW-STD-03). Then it says, "Given the combination of NOGA-FWSTD-03 and the preservation of all management tools that could help implement proactive stewardship activities, including commercial timber harvest,[hellip]"
- * Relative to Alternative 3: "Consequently, the rate of restoration of old-growth will be slowest under this alternative because the agency's ability to restore old-growth resiliency and achieve desired conditions would be more limited with the removal of commercial harvest as a management tool."
- * Related to exceptions to : "The project-level analysis will need to demonstrate that the Draft EIS - Amendments to LMPs to Address Old-growth Forests Across the NFS 17 proactive stewardship promotes one or more of the conditions and/or characteristics listed in 2.a.i-xii. This is intentional as some vegetation management needed to achieve management objectives (e.g. hazardous fuels reduction, resilience to insect and disease, species composition, etc.) could result in an area no longer meeting the definition of old-growth immediately following vegetation management being completed."

The orientation of timber harvest is not the same as ecologically appropriate management in older forests. As stated above, while there may be a commercial by-product of the activity, timber harvest is not the action. A more applicable term to use throughout the document would be tree thinning or individual tree removal in order to restore the vegetative structure associated with late-mature and old-growth forests such as reducing stand density resulting from fire suppression.

Another element that relates to the use of mechanical equipment for thinning that needs to be addressed is the infrastructure needed, like roads, to utilize this equipment or haul out felled trees. Road construction in a late-mature or old-growth forest is not consistent with the overarching objective of this amendment. Perhaps leaving felled trees in place will be needed with subsequent manual brush reduction. Alleviating concerns associated with road construction needs to be addressed or precluded in a modified amendment by specifying that tree removal techniques would not warrant road construction.

As to the statement that some vegetation management to achieve certain objectives may "redefine what is an old-growth forest"[mdash]this opens too big a window for projects occurring in old-growth forests with objectives that are not in keeping with conserving and stewarding old-growth forests. The document needs to elaborate

more on what is meant by exceptions that "redefine" an old-growth forest and why this avenue is included.

1. The Exclusion of Mature Forests and Old-growth Exclusions

Given that the focal ecosystem of the amendment is old-growth forests, one would need to manage for the succession of forests at different stages of development. Overarchingly, excluding "mature" forests from the amendment fails to meet the amendment's intent "to foster the long-term resilience of old-growth forests and their contributions to ecological integrity across the National Forest System." "Long-term" would necessitate assessment of forests at different stages of maturity.

Following is language from three sections of the document that raises some questions about exclusion and yet at the same time, perhaps the incorporation of mature forests in the modified proposed action:

* "Mature forests are not being included in conjunction with old growth for all aspects of the amendment.

However, the amendment does place an emphasis on identifying and prioritizing areas of mature forests to be managed for future old-growth forests, particularly in the modified proposed action in the draft environmental impact statement. Specific direction to identify priority areas for the recruitment of future old-growth forest - including from mature forest - is included in the modified proposed action as part of the long-term adaptive strategy for old-growth forest conservation and in a guideline that applies to management of those areas."

* From technical report FS 1215A: "Mature forest is not being included in conjunction with old-growth (e.g. "old-growth and mature forest") for all aspects of the amendment. However, the amendment does place an emphasis on identifying and prioritizing areas of mature forest to be managed for future old-growth forest, particularly in the Modified Proposed Action (Alternative 2)."

* "None of the alternatives require all areas currently meeting the definition (and associated criteria) of old-growth forest to be retained as such. Standard 2.a allows vegetation management to occur in areas currently meeting the definition (and associated criteria) of old-growth forest for the purposes of pro-active stewardship. (See the Glossary for definition of vegetation management and pro-active stewardship as these terms apply for the purposes of the proposed amendment and associated analysis.)"

There is no requirement that these areas continue to meet the definition of old-growth when managed for the purpose of pro-active stewardship[hellip].

The identification and prioritizing of mature forests for pro-active stewardship that have structural and ecological attributes (including species assemblage) "trending toward" further maturation and considering those mature forests that are geographically/spatially associated with existing old-growth forests, is critical for this amendment to be sustainable. This point needs to be daylighted and consistently applied. To exclude the word "mature" when defining the target forest type is not consistent with the objective of the action. Yes, management of all mature forests may not apply but "prioritized" mature forests should be defined in the glossary and included throughout the document IN CONJUNCTION with old-growth forests.

Rather than articulating that mature forests are not included in the lead sentence, instead start with the orientation that emphasizes that priority areas of mature forests would be determined and included. Substitute the term "mature forest" with "prioritized mature forest". This orientation speaks to forest succession and the long-term "resilience of old-growth forests." The document as currently written does not emphasize the assessment of priority mature forests for ecologically based management to sustain the next generation of old-growth forests.

As to the last bullet statement above, it is saying that old-growth forests are only of value if they meet the purposes of pro-active stewardship. Why would such a criterion be applied when old-growth forests are limited in their extent and should be conserved? This statement is contradictory to the application of pro-active stewardship where the quality, composition, structure, pattern, or ecological processes have been compromised from past

management and climatic shifts. From the document: "The objective of pro-active stewardship is to implement vegetation management that promotes ecological processes for old-growth forests[hellip]". yet as phrased in the last bullet above it reads like application of pro-active stewardship is the driver, not the condition of the mature/old-growth forest. Instead, the language should emphasize that the condition of the mature and old-growth forests should be the driver for engaging in pro-active stewardship, not the other way around.

1. Promotion of Cross-Jurisdictional/Borderless Stewardship Activities

While the recognition that "there is no single management prescription or definition that applies to all of the forest types across the National Forest System" is important, equally so, is a "borderless" approach that crosses Forest Service jurisdictions and applies a bioregional perspective of mature/old-growth forest types where applicable. There is some text in the document that speaks to this, for example from: Management Approach 1(a) and 1(b) "allows for development of adaptive strategies across planning unit boundaries where it makes sense to do so ecologically and organizationally," as well as Management Approach 1.c (NOGA-FW-MA-01c) that states "One or more Forest Service units may create a joint Adaptive Strategy for Old-Growth Forest Conservation". "Allows" and "may" somewhat weakens the objective of old-growth forest resiliency and adaptability that would be supported by borderless stewardship. An articulation throughout the document should strongly encourage or promote joint strategies on the landscape where applicable, not just pose this as an option.

1. Wildland Fire Use

I did not see any stewardship options related to wildland-fire use as a "tool" for restoration. While the application of wildland fire would be very dependent on the landscape setting, the proximity to the Wildland Urban Interface, or the structural conditions of the forest where the fire is occurring, if the aforementioned aligned positively, wildlife fire use could apply. Another consideration would be in those areas where pro-active stewardship has occurred, wildland fire could be used to sustain applicable, historic fire regimes.

I would ask that wildland fire use be considered as a restoration tool in the document.

1. Relationship to the Northwest Forest Plan or other existing Late-Successional Forest Planning Documents

The Northwest Forest Plan (NWFP) that spanned National Forests in the Pacific Northwest and Northwest California, was oriented toward the conservation of late-successional forests[mdash]the species and ecological relationships associated with these forests. Upon my review, I did not see any reference to this document--this important effort-- that was signed into effect in 1994. The Plan focused on "Lands reserved for the protection and restoration of late-successional, old-growth forest ecosystems and habitat for associated species[hellip].

The document states that "An already existing strategy or other document may also be used if it meets this intent and contains, or is amended to contain, all substantive elements described for Management Approach 1.a." Given the existence of the NWFP and its orientation to late-successional, old-growth forest ecosystems and the EIS amendment's objective "to provide consistent direction to conserve and steward old-growth forest conditions in response to rapidly changing climate conditions" I would have expected guidance already in place that has similar intentions, such as the NWFP, would have been specifically referenced in the document.

My question: what does this amendment mean for the NWFP which is also under revision at this time? Did coordination take place where late-successional forest planning documents already existed to ensure as best as possible consistency between the proposed amendment and these documents?

In closing I will say that I am glad the document speaks to the inclusion of pro-active stewardship in the program of work budget, yet the language should not be limited to a given unit. Include and maybe emphasis budgets integrated across Forest units where opportunities for a "borderless" stewardship project could work. In addition,

the planned monitoring (Plan Monitoring 1 NOGA-FW-PM-01) is also an important inclusion--"Plan monitoring is required as described in 36 CFR 219.12". Monitoring is consistent with learning about what approaches mattered the most and tracking changes in the conditions of the forests so adaptive management can apply.

Sincerely,

Lisa D. Hoover

[1] USDA 2022. Landscape Vegetation Community Types, Fire Regimes, and Associated Desired Ecological Conditions Six Rivers Hazardous Fuels and Fire Management Project.

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