Data Submitted (UTC 11): 10/28/2024 4:00:00 AM
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Comments: Please see the attached comments, filed on behalf of the Federal Forest Resource Coalition and the Federal Timber Purchasers Committee.

Please accept the below comments on the above captioned Federal Register notice on behalf of the Federal Forest Resource Coalition and the Federal Timber Purchasers Committee.

General observations: While we appreciate the opportunity to comment on the silviculture manual, we must initially express our frustration that there was no outreach conducted on this until several weeks after the Federal Register notice appeared. We recognize that you have no legal obligation to inform us of this beyond publication in the Register, however, in the spirit of cooperation and collaboration, we expect that you will be more proactive in seeking our input on manual changes that directly impact forest management operations. The members of FFRC and participants in the Federal Timber Purchasers Committee have immense experience and knowledge about forest management, including applied silviculture. We believe it is in both of our interests to engage more proactively when changes like this are proposed.

Second, we urge the Forest Service to direct silviculturists to simplify prescriptions to avoid unnecessarily complex timber sale operations, and to draw from the considerable knowledge and experience in the Forest Service and outside the agency. As an example, while there is some recent research demonstrating that relatively complex prescriptions in Southern Yellow Pine stands can be used to favor longleaf pine (a preferred habitat for several species of conservation concern), there is also considerable (but much older) research showing that longleaf pine can be established faster using silvicultural prescriptions that produce more volume per acre, and are thus more attractive to potential bidders.

Silviculturists should also be provided with better direction on how to develop prescriptions which can be readily used for projects using designation by description or designation by prescription. While in theory any prescription could be used in such a project, again, simpler prescriptions will generally work better, particularly if tailored to locally-effective technology and harvesting methods.

We also urge you to focus on developing and implementing silvicultural prescriptions that effectively regenerate and manage shade-intolerant species. We are concerned that in many places, the Forest is not managing planted or natural regenerated forest types like red pine by failing to control hardwood competition. We have seen in the Lake States where the Forest Service is allowing shade tolerant species in red pine stands, which turns them into poor quality maple stands. In some cases, desired species need to have sun on the soil and the soil extremely scarified to regenerate. The manual should encourage silviculturists to create clear prescriptions which effectively regenerate desired species and forest types.

Last, we must express our concern that the Forest Service is now incorporating [ldquo]assisted migration[rdquo] into its manual and directives process. When we requested information about the meaning and implications of [ldquo]assisted migration[rdquo] several years ago, the Forest Service only provided us with a single, heavily redacted document. In fact, the only things that were unredacted were paragraphs from existing handbook and manual direction. While we recognize that forest managers must be cognizant of climate change and use reliable scientific data and observations to drive local management, we believe the Forest Service must be more transparent and less constrained by inflexible nationwide mandates, while incorporating the concept of

[ldquo]assisted migration[rdquo] into its handbook, manual, and other policies. Forest level silviculturist professional judgment to develop effective local prescriptions cannot be constrained by top-down national policy.

Below are specific comments on the proposed silviculture manual language:

In Sec. 2470.03: Policy [ndash] We recommend the following change: [ldquo]Policy for prescribing, implementing, and monitoring silvicultural practices that are used to restore, sustain, and foster the health, resilience, and productivity, and multiple use management of forests on National Forest System lands at stand and landscape scales is as follows[rdquo]

We recommend adding a subsection 10 under policy:

[ldquo]10. Ensure that local bidders receive adequate notice of and are provided the opportunity to bid on all opportunities for contracting silviculture activities, including those conducted under Stewardship Contracting, Stewardship Agreements, Good Neighbor Authority, and others as appropriate.[rdquo]

The Definition of Thinning: (p. 19 [ndash] 20) ([ldquo]An intermediate treatment made to reduce stand density of trees primarily to improve growth, enhance forest health, to recover potential mortality, otherwise to promote stand development toward or conserve characteristic old-growth conditions.[rdquo]) is unnecessarily focused on creating [ldquo]old-growth conditions[rdquo] (which are also not defined in the definitions section of the manual).

Thinning may be conducted for a number of reasons [ndash] to meet specific habitat objectives, to allow safe reintroduction of prescribed ??ire, to improve stand resistance, or to provide a sheltered fuel break to aid in ??ire suppression among them. There is no ecological or We suggest changing this read [ldquo]to reduce stand density of trees to improve growth of residual stand, or remove undesirable trees, enhance forest health, reduce potential mortality, increase resistance and to meet specific forest plan objectives.[rdquo]

Also in the definitions section, the proposed changes define [ldquo]Stand Improvement (previously Timber Stand Improvement)[rdquo] as [ldquo]An intermediate treatment of trees not past the sapling stage made to improve the composition, structure, condition, health, and growth of even- or uneven-aged stands.[rdquo]

This definition narrowly defines the type of stand where such treatments apply; specifically in stands [ldquo]not past the sapling stage.[rdquo] The Society of American Foresters (SAF) Dictionary of Forestry defines [ldquo]stand improvement[rdquo] as:

An intermediate treatment made to improve the composition, structure, condition, health, and growth of a stand.

We strongly urge the Forest Service to adopt the SAF definition of Stand Improvement to include stands of any seral stage. There is no ecological or scientific basis for the Forest Service to exclude stands beyond the sapling stage under this silvicultural treatment.

An alternative option would be to add [ldquo]Timber Stand Improvement[rdquo] to the Definitions section of the Handbook. That term could explicitly include commercial and non-commercial treatments of stand of all seral stages.

Furthermore, we urge you to modify Section 2476.3 - Stand Improvement Categories to include a broader range of silvicultural treatments. As currently written, that range is limited to release and weeding, precommercial thinning, pruning, mastication, fertilization, and burning. We urge you supplement these categories to include commercial thinning.

The reference to [ldquo]REPLANT Act[rdquo] in the definition of [ldquo]Unplanned event[rdquo] is unnecessary. Clearly there are other definitions in the manual that are based on other statutes. It[rsquo]s not clear how adding this lone reference to a statute (without a code citation) helps clarify the meaning of "unplanned event.[rdquo]

In the definitions, we recommend you add a definition for [ldquo]resistance[rdquo] similar to the following definition from the Carson National Forest Plan [ndash] [ldquo]Resistance. The ability to withstand the effects of a disturbance or stressor.[rdquo] Managing for forest [ldquo]resistance[rdquo] is an appropriate approach for many western National Forests, especially forests adapted to high frequency/low intensity fires, and needs to be part of any discussion about reducing the risk of catastrophic fires and insect epidemics and increasing long-term resilience.

Sections 2470.03 Policy and 2477.02 Objectives [ndash] should add discussion about appropriateness of managing for [ldquo]resistance[rdquo] to catastrophic ??ire, insects, disease, and weather events.

We strenuously object to Sec. 2471.03 [ndash] Policy 4, which states: [ldquo]Base detailed prescriptions, upon current stand and desired conditions. Consider interdisciplinary input, including climate science, indigenous knowledge, and stewardship of old-growth forests.[rdquo]

We strenuously object to the prioritization of old-growth forests. There is no statutory basis for orienting all silvicultural prescriptions toward [ldquo]stewardship of old-growth forests.[rdquo] Old-growth forests represent a significant proportion of all forested lands on the National Forest System, and do not meet the ecological needs of all plant and animal species occurring on the National Forest System, not to mention species of conservation concern. Moreover, more than half of all current old-growth forests on the National Forest System are already in low- to no- management status, including designated Wilderness Areas, Inventoried Roadless Areas, National Monuments, and others. Fully 42 percent of forested acres on the National Forest System are in these management categories. There is no need (and no justification) for limiting silvicultural objectives on all NFS acres towards [ldquo]stewardship of old-growth forests.[rdquo]

We urge you to more clearly articulate in manual policy the importance of incorporating into prescriptions that values and tradeoffs for operational feasibility, modern engineering/access/operating/logging technologies surrounding the utility of effective and locally-viable mechanical treatments and markets.

2472.03 includes numerous references to [ldquo]climate appropriate[rdquo] reforestation and the need to consider [ldquo]changes in climate[rdquo] when making reforestation decisions. It would be helpful to cite the literature that supports the [ldquo]best available science[rdquo] when performing reforestation. The leading cause of deforestation in the West is wild??ire, insects, and disease. The question should be asked, What is the best available science to mitigate effects of wild??ire, insects, and disease under conditions of climate change?

It[rsquo]s important to distinguish between analysis requirements for Forest Planning versus analysis requirements for individual stand silvicultural

prescriptions. Climate science, indigenous knowledge, and stewardship of old-growth forests are appropriately considered at the forest plan level with direction subsequently incorporated into various plan components. Detailed prescriptions should be based on forest plan components. Silviculturists should not be expected to re-consider the forest plan analyses or direction as part of writing silvicultural prescriptions for individual stands.

In Section 2470.03(2), we recommend changing the definition to require use of practices to restore and maintain the health and resiliency of forests as directed under the governing land management plan. At minimum, this would include emergency removal of forest products in an area that has experienced a stand replacement event. In addition, recently burned areas require immediate reforestation with conifer seedlings of species native to the area and seed zone. These steps will help facilitate the establishment of a mature, healthy, conifer forest instead of a [ldquo]montane chaparral[rdquo] area.

Amendment 1909.12-2024-1 to the Forest Planning Handbook clarified that indigenous knowledge and

information from Tribal and indigenous participants are appropriate sources of Best Available Scientific Information. We support that, as part of considering any and all relevant information. However, it is inappropriate to single out one element of BASI, in this case [ndash] indigenous knowledge, in FSM Chapter 2470 without including other sources of knowledge such as state and local governments, local landowners, forest products companies, conservation districts, and others.

We recommend deleting the 2nd sentence of Policy Statement #4 and inserting [ldquo]forest plan[rdquo] before [ldquo]desired conditions[rdquo] in the 1st sentence.

It seems bizarre that under [ldquo]Responsibility[rdquo] (2471.04b), the only [ldquo]responsibility[rdquo] of the District Ranger is to [ldquo]Ensure silviculture prescriptions developed for prescribed ??ire in forest vegetation settings are reviewed by a prescribed ??ire specialist or fuels specialist.[rdquo] In addition to being unusually narrow, the proposed description of the District Ranger[rsquo]s sole [ldquo]responsibility[rdquo] strongly hints at an overemphasis on the use of prescribed ??ire as a forest management tool. District rangers should ensure that silvicultural prescriptions are implemented which move the forest on their district towards desired future conditions identified in the Forest Plan.

In Section 2471.04 (a) and (b), the Forest Service should clarify why the Regional Forester has authority over silviculture and the District Ranger has responsibility over prescribed ??ire. We would argue that the District Ranger should have authority over silviculture and prescribed ??ire. Separation of authorities causes more layers of approval resulting in less work being implemented in the forest.

We recommend adding responsibility for Forest Supervisors:

[ldquo]2472.03b - Forest Supervisor

1. The Forest Supervisors shall plan and program silviculture to meet the objectives of the forest plan. Schedule silviculture treatments as appropriate. Ensure areas planned for silviculture treatments are tracked.[rdquo]

The Sections on reforestation after unplanned events (2472.2) should emphasize rapid reforestation of areas deforested by [ldquo]unplanned events.[rdquo] We are aware of numerous examples where failure to promptly salvage, control competing vegetation, and re-establish stands of trees are leading to type conversion away from forest to more or less permanent brush fields on National Forest System lands. The manual should recognize this phenomenon and take steps to encourage appropriate reforestation, particularly in general forest areas, and those designated Suitable for Timber Production. National forest land practices should remain consistent and in-compliance with their respective State reforestation policies.

Section 2472.3 - Reforestation Process requires the FS to [ldquo]Practice climate-informed reforestation consistent with land management plans.[rdquo] While we understand the need to consider climate variability and climate change in making reforestation decisions, we urge the Forest Service to be extremely cautious about deciding to forgo reforestation over concerns that [ldquo]climate informed[rdquo] reforestation techniques are either unknown or not fully perfected. It is vitally important to reforest as much National Forest as possible, including lands needing reforestation due to natural disturbances and [ldquo]unplanned events.[rdquo]

We agree with the statement in 2472.6 - Natural Recovery that [ldquo]When harvest is applied or if in an area that is considered suitable for timber production, natural recovery is not an appropriate prescription. These areas should be prioritized for reforestation, including site preparation, planting, direct seeding, or natural regeneration treatments[rdquo], however, we recommend that you move that text to 2472.03 Policy.

Under the definition of natural recovery, the definition should simply be [ldquo]No Action.[rdquo] [ldquo]No action[rdquo] is the most common method implemented on Forest Service lands in the West that have

experienced a stand replacing event. Large fires left alone result in snag infested, brushy, unhealthy forest conditions. Dead and decaying trees release greenhouse gases including methane gases emitted by larvae and insects, resulting in an area that emits carbon as opposed to sequesters carbon. In addition, these [ldquo]No Action[rdquo] burned areas result in conversions to [ldquo]montane chaparral[rdquo] which have a catastrophic ??ire return interval every 25-30 years. Conversely, the catastrophic ??ire return interval of mature conifer forests is over one hundred years.

Thank you for the opportunity to provide this feedback on the proposed manual changes.