

Data Submitted (UTC 11): 10/28/2024 4:00:00 AM

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Comments: Please see attached comments regarding FSM 2470.

Thank you for the opportunity to comment on the proposed revision of Forest Service Manual (FSM) 2470, which provides the framework for stand-level information gathering and decisionmaking. The Southern Environmental Law Center has been advocating for revisions to FSM 2470, along with Forest Service Handbook (FSH) 2409.17 and associated regional issuances, for years. We therefore sincerely appreciate the Forest Service's willingness to undertake this revision.

Ironically, we write now to strongly urge the Forest Service to table the revision process for the time being. With the National Old Growth Amendments still in process and the growing realization that the agency's performance targets need an overhaul, the proposed revision will be outdated before the ink is dry. By waiting until the dust settles on other overarching policy changes, we can avoid the confusion and lost efficiency that would come with having to patch or overhaul this direction yet again in a year or two.

To begin, we note that the draft is very similar to the prior version of Chapter 2470. For example, the section on "harvest cutting" is materially unchanged except for the addition of "disturbances and climate change" as stressors to which tree cutting may respond. Compare FSM at 2471.02 (2014) with Draft at 2477.02. As another example, the draft still anticipates that silvicultural examinations and prescriptions will promote an "orderly silviculture program of work." Draft at 2471.03.

To be frank, minor incremental adjustments are not adequate to meet the moment. Silviculturalists' jobs are harder than ever. An orderly, scheduled timber program was never fully compatible with ecological integrity. Now, as the agency reconceives of vegetation management as a way to manage other landscape-scale stressors, scheduled silvicultural entries are clearly a luxury that most forests don't have anymore. As a result, the job of Forest Service silviculturalists is changing in fundamental ways. Now, silviculturalists are on the front lines of a wicked problem—optimizing for outcomes across multiple scales and values: locally rare ecological values versus economically viable harvest opportunities, plan-level habitat needs versus timber objectives, ecosystem-scale needs for old-growth restoration versus budget-constrained treatment options for fuels reduction, and NFS-scale goals of carbon storage versus timber quotas.

Forest Service policy must make the job easier for silviculturalists. Both the current manual and the revised draft provide that silviculturalists must consider "site capability, management direction, and landscape context." Draft at 2471.2. While this direction begins to acknowledge the difficulty of the problem, it doesn't make the job any easier. Because the silviculturalist's work affects ecological needs and social values that are so often in competition, it is no wonder that proposals to harvest timber are so often controversial. Imagine, as a silviculturalist in a stand that could as easily be harvested to create early successional habitat as allowed to continue on a trajectory toward old growth, being told to move the stand toward stand-level desired conditions in light of "interdisciplinary input, including climate science, indigenous knowledge, and stewardship of old-growth forests." See Draft at 2471.03. How would you make that choice? What information would you need? The draft revision doesn't help to answer those questions.

Leaving these problems to silviculturalists without any clear guidance for how to prioritize or solve them is a recipe for failure and inefficiency. As we understand it, the Forest Service's overarching goal these days, when "budget constraints" and various "crises" are the bookends for every policy conversation, is to reduce inefficiency and thereby to increase the pace and scale of beneficial vegetation management. If so, then FSM 2470 and FSH 2409.17 are the lynchpin. Greater efficiency demands priority-

setting. These directives are essential to operationalize vegetation management priorities.

Starting from the top down, revised versions of FSM 2470 and FSH 2409.17 must explain how the Washington Office will exercise oversight to ensure that ecosystem-scale priorities are contributing to the achievement of ecologically appropriate, NFS-scale performance measures. They must also delegate responsibility to Regional Foresters to oversee the articulation of climate-smart strategies at the ecosystem scale, including a silvicultural prescription toolbox that balances the needs for retention and removal and specifies the criteria used to choose between them. And, finally, they must specify (or leave to Regional issuances to specify) the kinds of information that must be gathered in the field in order to apply those criteria.

We emphasize the importance of developing a climate-smart forestry toolbox. The basic forms of silvicultural treatment that the Forest Service uses (even-aged, two-aged, uneven-aged, intermediate, and stand improvement) are far too cramped. Indeed, our best foresters have often been forced to use terminology that doesn't reflect the purpose or the nuance in their prescriptions—like using the term [ldquo]shelterwood[rdquo] for a variable density harvest designed to remove off-site species. We need sharper tools in the toolbox so that all silviculturalists can use them. Whether this toolbox is ultimately incorporated into the Forest Service's directive system or not, the directives must at least identify what kinds of information must be gathered to inform which tools to use, based on criteria that account for landscape-scale needs and national priorities.

For example, if the Forest Service means to prioritize and track progress toward old growth restoration, then the agency must develop and use prescriptions, including passive prescriptions, that will meet other management needs while also moving toward that goal. In the Southeast, this might include prescriptions for removing uncharacteristic species in the canopy, thinning and/or burning in fire-suppressed stands, and single-tree selection in healthy older mesic forests. Though the specifics would vary by region, this general approach would give silviculturalists guidance about what kinds of opportunities they should be looking for in the field.

We will be ready to build these toolboxes soon, but we aren't quite ready yet. At the very least, the Forest Service should wait to finalize FSM 2470 (plus a new version of FSH 2409.17) until it has finished its work on the National Old Growth Amendments and has begun to flesh out how recruitment will work. To be clear, the recruitment question is highly relevant here. Because some (but not all) mature forests need to be recruited as future old growth, the Forest Service will have to develop strategies for discerning which mature forests will move toward old growth and which ones should be managed for other purposes. What kinds of information will be needed to support those decisions, and how will these directives ensure that it is available? These are the same questions that the agency should be answering in these directives.

Ideally, the Forest Service would also wait to revise these directives until it has made more progress toward developing new key performance indicators for ecological outcomes. To track implementation of new performance measures across the NFS, the Forest Service needs consistency in its information gathering. These directives are the right place to provide for that consistency.

If the agency still intends to move forward with this revision now, we support the comments submitted separately by The Wilderness Society with specific concerns and recommendations for improvement. We still caution, furthermore, that additional revisions will be necessary after old growth policies are finalized and new performance measures are in place.

Thank you for your consideration. We would be pleased to discuss these comments further if helpful.