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Comments: Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?project=Directives-4178>

89 Fed. Reg. 66671-66672, (Aug. 16, 2024)

Stephanie Miller

Assistant Director for Future Forest

Denver Federal Center,

Building 40 Lakewood, CO 80215

October 28, 2024

Re: Notice of Availability for Public Comment, Forest Service Manual 2470, Silvicultural Practices

Dear Assistant Director Miller,

American Forests is pleased to submit comments in response to the U.S. Forest Service's notice of availability of proposed revisions to Manual 2470 (FSM 2470). FSM 2470 offers bedrock guidance for the planning, implementation and monitoring of silvicultural practices intended to restore, sustain, and foster the health, resilience, and productivity of forests on National Forest System lands. The proposed directive outlines for the first time, a needed approach to ensure silvicultural examinations, diagnosis of treatment needs, and the preparation of prescriptions incorporates the best available climate science and indigenous knowledge. It also offers a comprehensive approach to climate-informed reforestation that we believe is critical to responding to contemporary and compounding disturbance threats facing the National Forest System.

American Forests is proud of a deep history leading the forest conservation movement, dating back to our role in convening the First American Forest Congress in 1882, to today, where we have played leadership roles among coalitions prioritizing wildfire prevention, urban forestry, forest-climate solutions, and forest restoration. American Forests remains a preeminent leader in the application of science-driven, climate-smart forestry initiatives at national, regional, and local scales. With core capacities spanning science assessment and delivery, collaborative planning, implementation and monitoring, and complementary programs focused on policy and communications, American Forests offers a diverse and experienced perspective on the challenges confronting forestry and natural resource managers in the face of unprecedented and rapidly accelerating climate impacts, including those specific to the National Forest System.

American Forests applauds the agency for a thoughtful set of proposed revisions that clarify direction and assign responsibilities to incorporate forecasted climate impacts and variability into operations and land management prescriptions. We are grateful to the agency's leadership for the thoughtful engagement of line officers and field perspectives in the development of the proposed directive and believe it offers a wholistic approach that can further the adoption of needed post-disturbance reforestation initiatives in response to the implementation needs of the Repairing Existing Public Land by Adding Necessary Trees Act (REPLANT Act).

Within in the context of our broad support and encouragement for the effective implementation of the proposed directive, we offer the following comments for further consideration as the directive is finalized:

p.13, Climate-informed reforestation

We support the inclusion of this definition and the wording of the definition itself. There is a type in that there is an errant quotation mark at the end of the definition.

p.15, Natural Recovery

The definition uses the phrase, "many years to attain stocked forest conditions," and the phrase "many years" is somewhat open to interpretation as to its meaning. We see that per 2472.03 natural recovery is to be reported in the standard database of record and that per 2472.6:

When expected results are not achieved, follow-up treatments should be prescribed as deemed appropriate. Areas designated for natural recovery due to low site productivity, erosion potential, slopes, and other physical or ecological barriers need to be considered for land suitability re-classification in the forest plan monitoring reports. Natural recovery should be tracked in the database of record but is not reported as a reforestation need nor counted as an accomplishment.

We would recommend that over time trends with lands placed in natural recovery should be monitored to assess the (1) the proportion of lands designated for natural recovery that (a) do recover desired vegetation-and how long this takes, and (b) do not recover desired vegetation, and (2) the amount of acres designated for natural recovery that are reclassified to non-forest vegetation types.

p. 28, Setting and Tracking Priorities

We note an apparent typo in paragraph 2 with a missing word prior to the word benefits. We suggest the following revision: "Projects will be ranked based on the documentation of an effective reforestation project plan, the ability to measure the progress and success of the project, and the ability of a project to contribute to benefits relating to forest function and health, soil health and productivity,[hellip]"

p. 28, Economic Analysis

This section outlines the agency's desire to place emphasis on least-cost treatments for reforestation to achieve desired conditions. While a least-cost approach may be appropriate in response to constrained resources, we note that there are circumstances where higher cost treatment may be necessary to secure the range of desired conditions, objectives standards and guidelines. Notably, a wide range of reforestation costs driven by the high costs of site preparation and labor/contracting in some regions may skew the portfolio of reforestation treatments toward lower cost, rather than high priority acreages and treatments. Consider clarification in this section of the process for decision-making and justification of these higher cost reforestation treatments when necessary to achieve priority management objectives.

p. 31, Regeneration Examinations

While conscious of the burden of adding additional reporting requirements, we suggest the agency consider whether stocking and planting survival survey findings should be catalogued in the database of record to inform broad scale assessments of treatment effectiveness and to monitor further intervention costs and needs.

p. 33, Forest Nurseries, Policy, Purchases from State, Tribal and Private Nurseries

As written, the proposed directive would limit partnerships with state and tribal nurseries to only those circumstances where Forest Service Nursery System cannot fulfill requests—a limitation intended to address solvency and operational costs of the Nursery System. While we appreciate the need to maintain the service-based operations of the Nursery System and working capital fund, we believe this default may not be appropriate in all circumstances. In some regions there may be a need for a portfolio of supply that best optimizes capacity, manages risks, and delivers stock that meet source quality and quantity standards. Partnerships with state and tribal nurseries can serve as a foundation for other reforestation implementation needs beyond seed and seedling development. We recommend clarifying the circumstances in which an exception to this default may be considered and believe the authority for this decision best rests with the regional forester.

Similarly, we believe there may be scenarios where procurement from private nurseries of seedling species or genetics, containerized seedlings, or other attributes may be advantageous as part of the agency's climate-informed reforestation strategies. Consider a scenario where the agency may wish to partner with a non-governmental entity through contract or cooperative agreement to support nursery functions on behalf of a federal, state or tribal partner. We encourage the agency to take a more portfolio-oriented approach that optimizes capacity, risks, and meets quality and quantity standards. We also believe discretion to enter these partnerships and weigh costs and benefits is best made by the regional forester.

p. 37, Purchasing Nursery Stock

In line with our previous comments, this section describes the limitations in the Federal Acquisition Regulation (GSA) for purchases of nursery stock outside of forest service nurseries and further codifies the Forest Service's Nursery System first requirements. We believe this section as currently drafted offers limited guidance to line officers who may be considering negotiation of acquisition of nursery stock with state and tribal partners. We specifically believe this section could be enhanced by noting the FAR's procedures for contracts with State, local, and federally recognized Indian tribal governments and the ability to justify exceptions to costs through the Office of Management and Budget. We further encourage consideration of guidance on the circumstances in which the agency may wish to capitalize other services, research or implementation needs in as part of seedling acquisitions and costs with these partners.

p. 42, Accountability

This section specifies that the Regions develop a schedule for retesting seedlots that have not been used for a period of five years. We believe that additional guidance can be provided here to specify that this schedule should be species specific and in accordance with regional industry standards and generally align with those acceptable by state and private land managers and nurseries.

p. 46-47, Assisted Migration

This section codified guidance emerging from the extensive and thoughtful work of the Forest Service Assisted Migration Technical Assistance Team. American Forests supports the approach to consider assisted migration based on a science-based assessment and analysis. We further appreciate this section's emphasis on collaboration and coordination with other programs in the National Forest System, Forest Service State, Private

and Tribal Forestry, Forest Service Research and Development, other Federal agencies, State agencies, Tribes, industries, universities, and private landowners conducting genetics programs, and would encourage inclusion of nonprofit partners in this list.

p. 47, 2475.03 section 8

This section lays out the need to "maintain identification of plant material through all stages of collection, collection, processing, storage, nursery production, distribution, and other activities, including final use in reforestation or genetics projects." This is helpful however, more specified guidance may be necessary as we have found that it is common practice to 'bulk' seed collections across a seed/breeding zone. This results in removal of the precise geographic location of collection and results in uncertainty when trying to utilize tools such as the Seed Lot Selection tool as the climate of the collection location is no longer known. In many parts of the U.S., the industry and state agency standard does not allow bulking of collections across a seed/breeding zone to ensure the original seed location (Lat/Long, GPS Coordinates, PLSS, etc.) is maintained allowing for informed decisions about assisted migration and seed deployment. Bulked seedlots may place managers at a disadvantage when attempting to make informed decisions regarding assisted migration and climate matched seed deployment.

p. 61 Stand Improvement for Resource Management Objectives

While this section notes opportunities to coordinate with other resources such as Fire Management in achieving desired stand improvement, we believe further description of the opportunity for coordination early in the development of reforestation prescriptions of anticipated stand improvement needs would clarify opportunities to integrate funding sources and programs to achieve mutually beneficial outcomes.

Sincerely,

Brian Kittler

American Forests