

Subject: Objection to BNF Forest Plan Amendments #57302

Responsible Officer: Matt Anderson, BNF Supervisor

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Below is my objection to the proposed programmatic Forest Plan Amendments (FPAs). I had earlier submitted comments on the Draft EA on 8-8-2022, and these are referred to in the text below.

The effects of the FPAs have not been adequately analyzed. An EIS should have been done. Instead, the “responsible individual was able to reach a finding of no significant impact” (Final EA, Appendix A); that is, he was able to determine that an EIS was unnecessary. How was this determined without adequate data? For example, the Final EA did not include the BA for wolverine or the transmittal letter that also mentions grizzly bears; both were just posted last week. And below, you can see that many of my questions in my submitted draft EA comments were not answered, apparently because no analysis was done.

The FPAs are either unnecessary or are detrimental to wildlife and wildlife habitat. While changing the definition to identify old growth to Green et al (1992) appears justified, using that definition to manage old growth is not. Management direction for old growth was not the intent of Green et al (1992). However, many other scientists have given management direction (for example, Yanishevsky; 1994; Hessburg et al., 2015; Fielder et al., 2007a,b; Wales et al., 2007; Rapp, 2003) and all recommend retaining all or nearly all old or large trees (see my Draft EA comments for details). Yet, Final EA, p. 24, states: “A single old tree does not constitute old growth. Retaining every old tree is simply not practical.” All the above references also recommend that roads fragmenting habitat not be built, yet the FPAs also propose to change elk habitat protections to allow higher road densities. Those elk habitat protections also protect habitat for many, many other wildlife species. Retired BNF Wildlife Biologist Dave Lockman previously commented that EHE is used to protect habitat of many other species: “*The EHE standard results in areas of secure habitat for a range of species including grizzly bears*”. (p. 10, Gold Butterfly Biological Assessment; p. 9). The proposed FPAs also change standards for snags and coarse woody debris. The FPAs remove standards for all these issues and replace them with guidelines that are weaker and not enforceable. In short, the FPA weakens protections for wildlife and for wildlife habitat

The FPA for old growth is unnecessary. BNF already has the ability to protect all the old growth it wants; a Forest Plan amendment is certainly not needed. BNF can also protect all the mature forest it wants to recruit for future old growth, which would follow the direction and intent of E.O. 14072. Final EA, p. 37, states that only 3-4% of lower elevation BNF forests are currently old growth, far short of Lesica’s (1996) estimate that “old growth occupied 20-50% of the pre-settlement forest landscape in low and many

moderate elevation habitats.” That tells me that all lower elevation mature and old growth PP-DF forest should be protected and recruited for future old growth—none should provide any commercial timber.

But because site specific amendments nearly identical to the proposed programmatic FPAs have been repeatedly attached to all recent timber projects, it is logical to conclude that the proposed FPAs amendments will ease approval of timber projects. The FPA EA does nothing to reassure me that is not the intent. For example:

Appendix A, p. 121, in an attempt to quell the public’s fears that old growth will be cut to the bare minimum, makes a big deal out of eliminating the word **minimum** from the phrase: “...vegetation management activities in old growth should retain all **minimum** old growth characteristics as defined in Green et al....”. But you also eliminated the word **all**, which should have been retained if you are truly serious about protecting old growth. You should also replace the word **should** with **will**. If your intent is really to protect old growth the statement would read: “...vegetation management activities in old growth **will** retain **all** old growth characteristics as defined in Green et al.....”. But we all know that you can already protect all the old growth and mature forest you want; you do not need a Forest Plan Amendment to do so.

The new old growth guidelines “*prohibit vegetation management in old growth stands unless it is conducted to increase resistance and resilience to disturbances or stressors that may have negative impacts on old growth characteristics or abundance (such as drought, wildfire, and bark beetles).*” Aren’t these exactly the same words you have used to justify all recent commercial logging projects? The result is always fragmentation of habitat by roads, removal of wildlife hiding and thermal cover, a decrease in habitat connectivity, an exponential increase in invasive weeds, and a big increase in illegal motorized activity. None that I know of have ever improved the forest ecology; all have impaired it. The proposed FPA guidelines appears to do nothing to protect old growth. And, again, I remind you that you can already protect all the old growth you want; you do not need a FPA to do so.

You did not respond to my questions in my comments on the draft EA submitted 8-8-2022. Specifically:

Please analyze the effects of amending FP old growth standards on climate change.

Will using the proposed amendment result in more large trees cut than if the current Forest Plan standards were used?

Will using the proposed amendment result in more commercial timber production than using the current Forest Plan old growth standards?

How will the proposed Forest Plan old growth amendment protect remaining old growth and recruit and expand existing old growth stands?

How will the proposed amendment affect your management of old growth in BNF projects?

How will your management incorporate the old growth management recommendations cited above?

What specific treatments will be allowed in old growth?

How many old/large trees will be retained per acre?

What will the minimum post-treatment basal area for old growth be?

Gold Butterfly DROD/EA documents indicate that you have not monitored indicator species as required by the FP. Without monitoring data, how can you assess the effects of this FP amendment on wildlife or old growth quality and quantity?

Please analyze the proposed old growth amendment's effects on wildlife in combination with the proposed FP CWD and snag amendment.

How will CWD amendments affect both the inventory and quality of old growth and mature forests?

How will you determine "excess snags"?

How will the FP snag amendment affect wildlife?

Please provide supporting references showing it is necessary to remove excess snags in order to address fuel loading or meet restoration objectives through sanitation treatments, salvage, and reforestation.

How will the snag amendment affect both the inventory and quality of old growth and mature forests?

What methods specifically will BNF use to determine old growth status and extent? Final EA, p. 24, states that: "Inventories of old growth are taken forest-wide using Forest Inventory Assessment plots on a recurring, statistically valid basis." But my Draft EA comments suggested that FIA data are inadequate, and a recent report on BNF old growth stated that there is one FIA plot of an acre or less per every 6,000 acres. **How is that statistically valid?** No mapping of existing old growth is possible using FIA data because the specific location of old-growth stands is not derived from FIA data. Sample design for FIA plots is semi-systematic: a sample taken randomly within a systematically placed grid. At most, each plot samples a maximum of one acre—far smaller than an old-growth stand—and so resulting estimates cannot determine the capability to meet biological needs of the associated wildlife. FIA statistics have no correlation to forest plan minimum old-growth stand sizes, nor to the spatial habitat needs of wildlife species. Despite using Green et al.'s criteria on the Westside project, stand exams, FIA data, and walk-through surveys failed to identify 25 acres of ponderosa pine-Doug fir old growth, the

largest old growth stand in the project area. Twenty acres of it were subsequently logged and taken out of old growth status in violation of HFRA.

REMEDY: Drop the FPAs—they are either unnecessary or detrimental to wildlife and the forest ecology. If you want to proceed, do a full EIS.

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