

Chris Taggart

From: USDA Forest Service <forestservice@public.govdelivery.com>
Sent: Thursday, July 14, 2022 10:14 AM
To: Ravalli County Commissioners Office
Subject: [EXTERNAL] Bitterroot Forest Plan Amendment Components to be Updated- Seeking Public Comments



Subscribed to updates for the Bitterroot National Forest Projects and new information is now available.

Update, a newer version of the signed scoping document has been posted to the project website. There is no new information, rather a complete signed text of the information below has been posted. The project website can be found at: <https://www.fs.usda.gov/project/?project=57302>

Bitterroot Forest Plan Amendment Proposal

Introduction

The Bitterroot National Forest scoped the need to amend the 1987 Bitterroot Forest Land Resource Management Plan (Forest Plan) standards for stream bank effectiveness and thermal cover in December 2019 (<https://www.fs.usda.gov/project/?project=57302>). Since that time, I've determined the need to amend Forest Plan components for old growth, coarse woody debris, and snags.

I am seeking feedback on these additional proposed changes to the 1987 Forest Plan, and to identify relevant scientific information and potential interdisciplinary team to consider.

Background and Scope of Decision to be Made

The National Forest Management Act and related regulations^[1], commonly called the 2012 Planning Rule, describe the amendment process^[2] when a Forest proposes to add, modify, or delete one or more plan components (for example, a goal, objective, standard, or guideline). This public notice, together with the December 2019 scoping report, is one of the first steps in the process. This notice describes the preliminary need to change the plan, the likely directly related planning requirements, and opportunities for public participation.

If approved, this amendment will apply to all future projects implemented under the 1987 Forest Plan. This type of plan amendment is known as a "programmatic" plan amendment. As such, it will be subject to the objection process found at Subpart B of the 2012 planning rule. As Forest Supervisor of the Bitterroot National Forest, I am the responsible official authorized to approve the proposed amendment.

Change

Amendments may be broad or narrow, depending on the need for change, and are used to help Forests adapt to new information or changes. I have the discretion to determine whether and how to amend the plan and to determine the scope and scale of any amendment. Work has not yet begun for the Bitterroot National Forest, and it can be a years-long process; in the meantime, we can resolve certain longstanding problematic language regarding snags and coarse woody debris and improve our inventory of old growth forest stands by amending the Bitterroot Forest Plan using the best current relevant science.

Old Growth Plan Components

The Forest Plan includes a forestwide standard for old growth (USDA Forest Service 1987, pp. II-20) stating: Stand conditions that qualify as old growth will vary by habitat type and landform. Current plan criteria to consider for identifying old growth include:

- Large trees, generally 15 per acre greater than 20 inches diameter at breast height (dbh) for species other than lodgepole pine and 6 inches dbh for lodgepole pine; canopy closure at 75 percent of site potential;
- Stand structure usually uneven-aged or multistoried;
- Snags, generally 1.5 per acre greater than 6 inches DBH and 0.5 per acre greater than 20 inches;
- More than 25 tons per acre of downed material greater than 6 inches diameter;
- Heart rot and broken tops in large trees are common; and
- Mosses and lichens are present.

The definition (based on Franklin et al. 1981) was the best information the Forest had for describing old growth characteristics when the plan was developed in the 1980s. However, this definition has several limitations. These criteria were developed for the Cascade Mountains Douglas-fir forest, which is not representative of conditions or the fire return intervals found on the Bitterroot NF. Additionally, it does not address the variability of old growth conditions across various biophysical settings (habitat type groups) or variability of species diameter as it relates to age. Many of the criteria in this definition cannot be accurately measured in the field nor are part of standard data collection protocols so they cannot be used at the project scale to determine if plan goals and objectives are being achieved. Since the plan was approved, the Northern Region developed more detailed descriptions for old growth forests by specific forest type and biophysical settings in the Northern Rocky Mountains as described in Green et al. (errata corrected 2011). Green et al. includes quantitative and qualitative criteria that are measured in the field by the National Forest Inventory and Analysis (FIA) data collection program and site-specific stand exams and walk-through exams.

The criteria in the Forest Plan, Green et al. (2011) provides measurable criteria for designating old growth based on forest types and habitat groups in Montana and Idaho:

- Criteria for live trees: minimum age (by species) of large trees, number of trees (trees per acre) by diameter at breast height (equal to or greater than a given dbh level and age) and basal area;
- Associated characteristics such as pieces per acre of down woody material that is at least 9 inches in diameter on the large end, number of canopy layers, presence of trees with broken/missing tops, trees with decay, and number of snags greater than 9 inches diameter at breast height.

We need to modify the forestwide standard and glossary definitions in the 1987 Forest Plan to those described in Green et al. (2011) to provide measurable criteria for monitoring old growth at the project scale and when evaluating whether project activities are maintaining or enhancing old growth characteristics associated with the varying forest types and habitat type groups (biophysical settings) across the Bitterroot National Forest. The amendment would align the Bitterroot Plan with the definition used in Region One and what is being used for the national Forest Inventory and Analysis (FIA).

Revision of standards in Management Areas 1, 2, 3a, and 3c is also needed to delineate old growth by stand as identified in Forest Service Manual 2409.17. Old growth would be delineated at the stand level based on forest composition and structure as defined by Green et al. for project area planning. Stands smaller than 40 acres, if meeting criteria, would be maintained or promoted as old growth during project implementation. Five acres is considered the minimum size for stand designation and even stands of this size are valuable as a key characteristic of old growth.

diversity. Due to the dynamic nature of stand progression, a forest-wide stand delineation of old growth will not be provided. Old growth is a dynamic state; natural disturbances such as windstorms, wildfire, insects and diseases can move a stand from one successional stage to another (Larson 1996).

The amendment will also comport with Executive Order 14072, which provides agency-wide direction for an inventory of old growth and the amendment will allow for consistent and reliable project-level identification and a statistically valid Forestwide inventory of old growth (Larson 1996). Applying Green et al. (2011).

Woody Debris (CWD) Plan Components

The purpose of the 1987 Forest Plan coarse woody debris requirements is to maintain soil productivity, design fire management programs to meet resource goals and to provide for non-game habitat. Since the Forest Plan was developed, scientific information became available regarding the amount of coarse woody debris present in different habitat type groups (Fischer and Bradley 1987, Graham et al. 1994, Brown et al. 2000). This information provides more refined measures to guide project implementation to contribute to achieving Forest Plan goals. Current management area direction for coarse woody debris retention does not recognize the differences in the natural variation in coarse woody debris among different forest and habitat types, as supported by the best available scientific information. Additionally, Management Area standards are contradictory standards requiring both 10 to 15 tons/acre and 25 tons/acre to be left after harvest activities. Lastly, the tons/acre of coarse woody debris prescribed in the 1987 Forest Plan exceed what current scientific information recommends is needed to maintain soil productivity and manage fuel loadings.

The need to amend coarse woody debris plan standards in Management Areas 1, 2, 3a, 3b, and 3c to resolve the contradictory direction in the current standards and ensure the amount of coarse woody debris to be left on the ground aligns with the current scientific information.

Standing Dead Trees) Plan Components

The Forest Plan includes a forest-wide wildlife standard for snags that states “All snags that do not present an unacceptable safety risk to humans (USDA Forest Service 1987, page II-20). A snag is defined in the Forest Plan as a standing dead tree usually greater than 5 feet in diameter at breast dbh.

The Forest Plan considers and permits salvage of dead or dying trees (FP Record of Decision 1987). Fuel treatment is discussed in several places in the Forest Plan (pages II-7, II-8, II-28, III-7, III-13, III-20, III-28, III-34, III-38, III-63). The Forest Plan FEIS even specifically discussed the effects of replacing fires following mortality from insect epidemics and due to fire suppression (Volume I, pages III-33, IV-22). Salvage is authorized in multiple areas of the Forest Plan and Record of Decision, further supporting that the removal of snags, beyond what is necessary for wildlife habitat, is programmed (FP pages II-20, II-20, II-22, III-8, III-14, III-21, III-29, III-35).

The need to amend this forest-wide plan wildlife standard for snags (USDA Forest Service 1987, page II-20) to resolve the contradictory direction in the current standards providing sufficient snag habitat for wildlife while also allowing for the removal of excess snags where necessary to address fuel reduction objectives through sanitation treatments, salvage, and reforestation.

Meeting 2012 Rule Requirements

Under the Forest Plan, I am required to apply the directly related planning regulation requirements described at 36 CFR 219.8 through the amendment. The directly related requirements are identified based on the purpose for and the effects of the amendment. I have the authority to determine the scope and scale of any amendment and am not required to apply any substantive requirements that are not directly related to the amendment.

The purpose of the proposed amendment is to update current plan direction for old growth, coarse woody debris, and snags based on current scientific information regarding the management of these characteristics of habitat diversity. Based on the purpose and likely effects of the amendment, the likely directly related requirements include:

- the requirements to provide for habitat diversity by maintaining or restoring key characteristics associated with terrestrial ecotypes at 36 CFR 219.9(a)(2)(i).
- the requirements to maintain or restore the ecological integrity of terrestrial ecosystems taking into account system drivers (natural succession and wildland fire) and the ability of terrestrial ecosystems in the plan area to adapt to change and opportunity landscape scale restoration at 36 CFR 219.8(a)(1) (iv) and (vi).

Participation Opportunities

describes how to provide comments for this initial scoping of the proposed plan amendment in the following paragraphs. An opportunity for public comment on the environmental analysis of the proposed amendment will be provided in the coming months. Individuals and organizations who submit substantive comments during these opportunities will be eligible to object to the draft decision or participate as a speaker at a public hearing or person in any resolution meeting that may be held.

Submit comments

For comments to be reviewed and considered in a timely manner, it is most helpful if comments are received within 30 days of publication of record. Comments received in response to this solicitation, including names and addresses of those who comment, will be a part of the public record for this project and will be available for public inspection. The following options are available for submitting comments:

Comments must be submitted by going to the project webpage: <https://www.fs.usda.gov/project/?project=57302> and under the Comment tab by clicking on Comment /Object on Project on right side of page.

Comments can be mailed, hand-delivered or faxed as follows:

National Forest

Plan Amendment

Street

MT 59840

Delivered to:

National Forest

Street

MT 59840

(406) 363-7159.

annotate on the cover page that these are comments for the Forest Plan Amendment.

Information about the project can also be found on the Bitterroot National Forest Project webpage:
www.fs.usda.gov/projects/bitterroot/landmanagement/projects or by contacting Kimberly Smolt, Special Projects Manager
(kmsmolt@usda.gov).

W ANDERSON

Supervisor

Regulations 36 CFR 219 can be found at www.cfr.gov.

219.13

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