

Old Growth

- 4 – Teck Washington, Inc., Pend Oreille Operations
- 5 – Washington Cattleman's Association
- 7 – Washington Wild
- 8 – Sierra Club/Alliance for the Wild Rockies
- 19 – Northeast Washington Forest Coalition

OBJECTIONS:

- **The LMP does not recognize old growth for special protection. This contradicts longstanding Forest Service policy (e.g., CNF's 1988 Forest Plan FEIS).**
- **The Colville NF has not maintained a forest-wide old-growth inventory. As a result, Forest managers cannot, as proposed in the LMP, use an inventory to monitor (1) management indicator species (MIS) associated with old-growth habitat or (2) old-growth and cavity dependent species to assure those populations aren't trending toward extinction or extirpation. Since there is no monitoring of old-growth areas, these areas also cannot act as valid habitat proxies.**
- **The Forest has conducted no research or monitoring comparing pre- and post-logging old growth occupancy by or abundance of wildlife species with strong biological associations with old growth. It is therefore unclear whether logged old-growth still provides these species functional habitat.**
- **The LMP and FEIS do not address how fragmentation, road effects, and past logging in old-growth areas have impacted wildlife habitat.**
- **The LMP fails to substantiate the claims (through scientific evidence) that development of old-growth characteristics can be accelerated.**
- **The LMP does not include scientifically sound management direction for maintaining structure, function, and composition of the forest, and the FEIS does not present an adequate analysis of the structure, function, and composition of the forest. This violates a requirement of the 2012 Planning Rule.**
- **The FEIS fails to consider the impacts from industrial management activities on the forest's mycorrhizal network, and the LMP does not acknowledge these organisms and their processes.**
- **The LMP weakens protection of old growth, late successional forests and Eastside Screens, which (especially in contiguous, roadless areas) provide critical habitat for a range of TES/SCC.**
 - **The final Alternative P leaves significant exceptions to cutting old/large trees.**
 - **The LMP's management strategy undermines recommendations of the Eastside Forests Scientific Society Panel (see objection 19-17).**
 - **The LMP lacks an accurate baseline of our old growth stands and there has been inadequate monitoring of the LMP's impacts on old growth.**
 - **Since the LMP fails to provide detailed standards and guidelines for protecting old growth habitat to "insure" wildlife viability and to protect wildlife diversity, the LMP violates NMFA's viability requirement and NEPA's requirement to follow best available science.**

Sample Comments:

The 1988 Forest Plan states a commitment and intent to "Inventory ... old growth forests..." (p. 2-21).
The 1988 Forest Plan and FEIS asserted:

The Forest is contracting a new vegetation inventory from which more precise information on old growth and other forest and vegetative characteristics can be interpreted. This inventory will be available for implementation and monitoring of the Forest Plan. (Forest Plan FEIS.)

However, the CNF has maintained no forestwide old-growth inventory. (See Attachment 2) The failure to inventory old growth is not a mere paperwork exercise. The barred owl, pileated woodpecker, and pine marten are 1988 forest plan MIS associated with mature to old growth forest habitats. (USDA Forest Service 2001e.)

The 1988 Forest Plan FEIS disclosed that under forest plan implementation:

The only old growth and large sawtimber will be in stands that are preserved or managed under longer rotations for recreation, wildlife habitat, or other specific purposes. Such[...]management areas or prescriptions are necessary to maintain diversity across the Forest.

...Under all alternatives, old growth forest and snags, especially in the larger size classes, will continue to decline throughout the portions of the Forest on which timber management is practiced. This will compound the direct and indirect effects previously discussed. [8-75]

The FS has not published an annual Forest Plan Monitoring and Evaluation Report for many years, despite forest plan requirements. Again we note that the CNF proposed using the "old growth inventory" as a way to meet Forest Plan wildlife monitoring requirements. (1988 Forest Plan at 5-20.) But that isn't all—the other wildlife monitoring requirements for old-growth and cavity dependent species found in Chapter 5 of the 1988 Forest Plan fell off the FS's radar screen. Such monitoring requirements were mandated by NFMA regulations, in order to assure that populations weren't trending toward extinction or extirpation.

The 1988 Forest Plan habitat management strategy for assuring viability of wildlife, especially mature/old-growth associated species and cavity habitat dependent species, has been tenuous due to simple logistical problems of finding suitable habitat at pre-established grid locations due either to past management or natural conditions. This is demonstrated by pervasive geographic habitat relocations of MA 1 during the timber sale design process, throughout Forest Plan implementation. (See Attachment 4 which is a "List of Amendments: Colville NF as of July 17, 2008" from the CNF website: http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_034850.doc.)

Furthermore, CNF biologist M. Borysewicz describes the forestwide situation as: "many, if not most of our reserved core habitat areas for pine marten do not meet the desired stand characteristics..." (See Attachment 3).

The Colville NF has conducted no research or monitoring comparing pre- and post-logging old growth occupancy by or abundance of the wildlife species with strong biological associations with old growth. Biologically speaking, the FS refuses to check in with the real experts to see if logged old growth is still functioning as their habitat. [8-78]

Green et al., 1992 also recognize that "Rates of change in composition and structure are slow relative to younger forests." The FS fails to acknowledge that there's no science to support the implication that development of old-growth character can be accelerated. [8-79]

Numerous species of wildlife use old-growth forests and large diameter trees, snags and down logs. Additionally, numerous species are closely associated with late-successional, old growth forests in contiguous roadless areas, such as Pileated Woodpecker, Black-backed Woodpecker, White-headed

Woodpecker, Pygmy Nuthatch, Three-toed woodpecker, Lewis' Woodpecker, Williamson's Sapsucker, and other cavity excavators. The Preferred Alternative reduces protections for big trees. The Eastside Screens 21-inch diameter at breast height (dbh) limit would be replaced by structural stage and wildlife habitat management. Indeed, the revised plan eliminates the Eastside Screens' connectivity corridor land use allocation and does not replace it with anything similar, and fails to explain why the Forest[...]Service has departed from its prior policy that wildlife connectivity requires specific management direction.

This forest plan gets rid of the protections of the Eastside Screens, and the Screens had previously weakened the original recommendations to Congress by the Eastside Forests Scientific Society Panel; they were only designed to maintain what little old growth habitat we have left, not to restore this forest component which is essential to a healthy and thriving eastern Washington. There is absolutely

[...]no scientific support for this approach. The lack of an accurate baseline of our old growth stands along with inadequate monitoring of the plans' impacts on old growth exacerbates the issue.

The importance of old growth in northeast Washington cannot be overstated. It has been reduced to dangerously low levels due to past logging activity. As a result, old-growth dependent species have become unviable. For example, researchers have found that old growth forests and historic ecosystem processes (including wildfire) are integral to the survival of migratory birds in the Pacific Northwest. The past and continuing logging-oriented management of the forests of Oregon and Washington, which provide nesting and fledgling habitat for numerous migratory birds, has resulted in severe ongoing population declines in forest canopy-dependent migratory and native birds (Sharp 199612). American marten and goshawk are just a few of the other species that rely on our legacy forests.

We ask that detailed standards and guidelines be developed that protect old growth habitat to "insure" wildlife viability and to protect wildlife diversity as required by the National Forest Management Act (NFMA). 16 U.S.C. § 1604. The plans fail to do so and thus the plans approach to old growth is a violation of NFMA's viability requirement and NEPA's requirement to follow best available science.

The goal of improving ecological resilience through restoring forest structures to historic ranges of variability cannot be achieved without clear and practical standards for retaining and recruiting large and old trees, and restoring landscape spatial patterns. The proposed dynamic landscape approach has ambiguous guidelines regarding large and old trees that must be clarified and strengthened to achieve resilient conditions, and meet wildlife viability and other direction. [19-17]

RESPONSE:

While the eastside screens have served to build trust among stakeholders and protect important remnant medium and large trees, a broad body of science now supports a more ecologically-based approach, which considers the desired conditions.

The proposed Forest Plan replaces Eastside Screens with a series of desired HRV conditions (described in FEIS, Vol. 1, pp. 92-94, 99-132) but allows cutting of individual large trees when needed to meet desired conditions for structural stages, along with several other exceptions (FEIS, Vol. I, pp. 28-30). It provides a desired condition for forest structure (FW-DC-VEG-03) that provides for a diversity in forage and wildlife habitat. Additionally, forest-wide desired condition (FW-DC-WL-03 and FW-DC-WL-13) state that habitat conditions should be consistent with the historical range of variability. The proposed approach provides the Forest with more flexible strategies to allow forest managers to better integrate old forest

conservation goals with other land management objectives. This approach avoids numerous site specific forest plan amendments to permit individual projects to harvest limited numbers of trees $\geq 21"$ dbh.

Instead of fixed reserves in the current Forest Plan the proposed Forest Plan would have late structure contained throughout the landscape and all actions that affect forest vegetation would be assessed and compared to HRV, with the goal of moving the overall landscape toward HRV. Also, maintaining a fixed reserve system does not guarantee all the allocated acres are in a condition that currently contain old forests because of natural disturbance processes.

The proposed Forest Plan will result in approximately 780,592 acres of late forest structure in 100 years, which is slightly less than the current Forest Plan (810,583 acres). The proposed Forest Plan would, however, allow structure classes to shift around the landscape in response to disturbance and may result in more resilient forest landscapes.

Inventory of old growth was identified as important in the current and proposed plans. Under the 1988 Plan there were surveys done on a project-by-project basis starting in the mid-1990s after the Eastside Screens plan amendment was added, and these surveys have continued to the current day for each of the vegetation management projects the Forest does. For the Forest Plan Revision, forest-wide data on forest structure was derived from LiDAR which shows late structure (which could be considered "old growth"). This LiDAR structure data could be considered a forest-wide old growth survey, since we can easily find where late structure is located and, in fact, have used it this way in recent vegetation management projects." Most of the old growth on the Forest is located within the Salmo-Priest wilderness area and other inventoried roadless areas. (Jonathon Day, Colville NF)

From FEIS, response to comments page 1029 - Alternatives R, B, O, and the no action alternative all include a 21" diameter limit. Additionally, the proposed revised forest plan contains a guideline (FW-GDL-VEG-03. Large Tree Management) that directs management activities to retain and generally emphasize recruitment of individual large trees across the landscape, and provides direction for the circumstances under which large trees (defined as larger than 20 inches dbh) may be removed. The effects analysis described in the FEIS shows that maintaining a 21" diameter limit reduces the ability to attain the desired future condition of having a majority of most vegetation types in late structure.

Modeling results described in the FEIS (chapter 3 Forest Vegetation) indicate that time is required to develop late structure across the landscape. This is consistent with other recent scientific articles (Haugo et al. 2015). The forest structure desired condition (FW-DC-VEG-03) includes an evaluation of the historical range of variability (HRV) and vegetation treatments at the project level will need to show movement toward this desired condition. This means that until the desired condition is reached, existing late structure would need to be maintained on the landscape. There is nothing in the plan prohibiting tree thinning or other methods that may increase the development of late structure.

Relationship of large trees and structural stages related to specific species is discussion in the FEIS (chapter 3 Wildlife).

RULE (Law, Reg, or Policy) (if applicable):

2012 Planning Rule Viability/Monitoring requirements

Renewable Resource Planning Act of 1974 as amended by the National Forest Management Act (NFMA) of 1976 requires the maintenance of diversity.

CONCLUSION:

The proposed approach provides the Forest with more flexible strategies to allow forest managers to better integrate old forest conservation goals with other land management objectives.

POSSIBLE INSTRUCTIONS (if any):

None