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Date: January 8, 2024

Subject: Administrative Change to Forest Plan standard FW-STD-TBR-04

To: Files

This letter completes an administrative change to **FW-STD-TBR-04** of the revised 2015 IPNF Land Management Plan (p. 40). The change is as follows:

FW-STD-TBR-04. Even-aged stands shall generally have reached or surpassed culmination of mean annual increment (95 percent of CMAI, as measured by cubic volume) prior to regeneration harvest, unless the following conditions have been identified during project development:

- *When such harvesting would assist in reducing fire hazard within the WUI; and or*
- *When harvesting of stands will trend landscapes toward vegetation desired conditions.*

The purpose of this change is to correct an error in the language of the standard. The change clarifies that regeneration harvest of even-aged stands may be implemented prior to culmination of mean annual increment when either of the conditions listed in the standard exist. This administrative change is made pursuant to 36 CFR 219.13(c).

This error was identified shortly after approval of the plan in January 2015. At that time a paper explaining the intent of the standard and guidance for application was developed (Zack et al, 2015). The paper was filed in the planning record. The paper demonstrated that a reading of relevant parts of the forest plan shows the two subparts of FW-STD-TBR-04 are clearly intended to be applied in the alternative and explains that this reading, is fundamental to achieving important parts of the forest plan's goals, desired conditions, and management objectives having to do with forest vegetation structure and composition.

The National Forest Management Act requires that timber harvest must occur at the culmination of the mean annual increment of growth, but also provides for exceptions at 16 USC 1604(m).

The 2012 Planning Rule requires plan components, including standards or guidelines, to meet this limitation as described at §219.11 (d)(7).

(7) The regeneration harvest of even-aged stands of trees is limited to stands that generally have reached the culmination of mean annual increment (CMAI) of growth. This requirement would apply only to regeneration harvest of even-aged stands on lands identified as suited for timber production and where timber production is the primary purpose for the harvest. Plan components may allow for exceptions, set out in 16 U.S.C 1604(m), only if such harvest is consistent with the other plan components of the land management plan.

The background for the IPNF's forest-wide goals and desired conditions pertaining to forest structure are found in the IPNF Forest Plan FEIS on pages 73-75, and show that:

- currently there is a surplus of small and medium size class forested stands (35 to 60 and 60 to 100



years old).

- together these size classes now comprise 57% of the forested land on the IPNF; and
- this amount is well beyond the historic range of variability for these size classes.

The surplus in the age class distribution has several implications, one of which concerns wildfire hazard (FEIS pgs. 74-75). Plan components FW-DC-VEG-02 and FW-DC-VEG-05 describe the need to decrease the percentage of middle-aged stands on the Forest. Typically, these middle-aged stands are dominated by trees in the small or medium size classes.

In order to make significant progress towards meeting forest plan goals, desired conditions and objectives, given the existing age class distribution on the IPNF, forest plan components Vegetation GOAL-VEG-01, FW-DC-VEG-01, FW-DC-VEG-02, FW-DC-VEG-05, and FW-OBJ-VEG-01 require that the two subparts of Forest Plan Standard FW-STD-TBR-04 (regarding exceptions to the 95% CMAI requirement for regeneration harvest) be applied in the alternative.

From the information contained in the FEIS and project record, Forest Planners understood the age class implications of the vegetation desired conditions for forest structure and composition and intended the two subsections to be applied in the alternative, to ensure progress toward restoring forest resiliency at the landscape scale (Zack, et al 2015). I have concluded that use of the word “and” rather than “or” between these two subsections was in error.

Under the 2012 planning regulations at 36 CFR 219.13(c):

"An administrative change is any change to a plan that is not a plan amendment or plan revision. Administrative changes include corrections of clerical errors to any part of the plan, conformance of the plan to new statutory or regulatory requirements, or changes to other content in the plan (§ 219.7(f))."

(2) All other administrative changes may be made following public notice (§ 219.16(c)(6))."

Pursuant to 219.13(c)(2), documentation of this administrative change is being posted on the Idaho Panhandle National Forests website at:

<https://www.fs.usda.gov/main/ipnf/landmanagement/planning>,

This administrative change will be effective immediately upon my signature.

TIMOTHY GILLOON
FOREST SUPERVISOR