

5. 10a-10b Management Prescriptions (Arndt)

Issue: In Alternative I, should the Mountain Forests have the option of allocating lands to Management Prescription 10A or 10B?

Priority: Moderate

Proposed Plan: Under the Design Criteria for Alternative I, it was decided that the “mountain” forests would not allocate any lands to the Management Prescription “10” Categories (Forest Products Emphasis Areas, of which the primary options were “10A” or “10B”). However, the “piedmont” forests did have the option, and they did allocate lands to 10A and 10B in Alternative I.

Background: Early on in the process, it was decided that for the “Rolling Alternative”, we would not have lands in the Southern Appalachians that were allocated to lands where the primary emphasis would be for the production of timber. Rather, timber production would be a “byproduct” of managing for other resource values and objectives. This meant that we would not allocate lands in Alternative I to Management Prescriptions 10A (Sustained-Yield Timber Management) or 10B (High Yield Forest Products). However, we have received some comments from the public questioning why no lands are allocated to a “timber production” emphasis. In past discussions on this subject, some Forests have been comfortable with this decision, while others have felt that there was general public support for certain areas to be allocated to a “timber production emphasis”. Particularly, for Management Prescription 10B, where we can argue that there is a demand for “high quality timber products” that are not available from private lands.

So, given that we have been questioned why the preferred alternative does not have ANY lands allocated to a timber production emphasis, should the Forests now have the option of allocating lands to Management Prescriptions 10A or 10B?

Options:

1. Continue with the decision to not have any lands in the Southern Appalachian mountain areas managed for the primary purpose of producing timber products.
2. Give Forests the option to allocate lands to either Management Prescription 10A or 10B to address local issues.
3. Give Forests the option to allocate lands to just Management Prescription 10B to address local issues.

Recommendation: Implement Option 2.

Rationale: In Option 1, it is questionable how well we can continue to justify under a “multiple-use” alternative, the decision to not have ANY lands allocated to a timber production emphasis. With Option 3, it is probably easier to present the “need” for this type of management to the “general public” (that being to meet the demand for timber managed on longer rotations in order to provide higher quality sawtimber products, and that the supply of these products is limited because private lands are usually managed

with shorter rotations). However, there may still be some local issues that could best be addressed by managing lands under Management Prescription 10A (a more intensive level of management than under 10B). So Option 2 would provide the best flexibility to address local issues.

6. Harvesting on Lands Classified as Not Suited for Timber Production (Arndt/Jeffers)

Issue: Should additional “provisions” be placed in the Forest Plan to address allowable harvesting activities on lands classified as not suited for timber production.

Priority: Low

Proposed Plan: The Forest Plans currently indicate that timber harvesting activities may occur on lands classified as not suited for timber production, and figures are provided on the estimated volume from these lands in the first decade. But generally, there is not much information in these Plans on this topic.

Background: The planning regulations at 36 CFR 219.27(c)(1) specify that: “No timber harvesting shall occur on lands classified as not suited for timber production pursuant to 219.14 except for salvage sales, sales necessary to protect other multiple-use values or activities that meet other objectives on such lands if the forest plan establishes that such actions are appropriate.”

The regulations have specified that harvesting activities on lands not suited for timber production can occur, and the Forest Plans have provided estimates of the volumes that might occur from such activities. However, we have received the following types of comments from the public:

- Although in theory, timber harvest can occur in prescriptions classified as unsuitable; our experiences show this rarely happens. Instead of using these classifications, much confusion could be eliminated by setting guidelines related to timber harvest in the prescription narratives and standards. If these classifications are retained, we urge you to clearly sanction commercial timber harvest as a wildlife management tool in prescriptions where this is appropriate.
- Salvage cutting on lands unsuitable for timber production is not part of the allowable sale quantity. This will merely produce another subsidized windfall for industry with the forest’s ecological integrity paying the price. The Forest Service must not log in areas that are “unsuitable.”
- Logging in unsuitable areas should have precise provisions so that they aren’t used as a loophole by timber industries.

So the issue is – Should the Forest Plans provide more direction on the appropriateness and limitations of harvesting on lands not suited for timber production?

Options: (Proposed solutions)

1. Do not change the Plan. Rely on the Glossary to define terms such as suitability, timber production, harvest cutting, and for “lands not suitable for timber production”.

2. Restate the language from 219.27(c)(1) in an appropriate place in the Plan. (Possibly restate as a Forestwide Standard.) Add language in the applicable Management Prescriptions to clarify the reasons harvesting on lands not suited for timber production is appropriate. Also identify any “restrictions” or “limitations” to harvesting on land not suited for timber production that may be deemed necessary (either at the Management Prescription level or at the Forestwide level).

3. Change the Plan and state that no harvesting activities will occur on lands classified as not suitable for timber production.

Recommendation: Implement Option 2.

Rationale: There is a lot of confusion with our publics on why we call lands “not suited for timber production” but we harvest on these acres anyway. Under Option 1, that confusion will continue. Option 3 is not realistic because we need to have the ability to treat the “not suited” lands to address forest health, wildlife, etc., needs. Also, the regulations specifically give us the option to do so. Option 2, or some variation of Option 2, would help clarify both our legally acceptable option to harvest on lands “not suited”, and to clarify for the public the appropriateness of such action. Additionally, as it stands now, not entirely sure the Forest Plans have met the requirement of 219.27(c)(1) to “establish that such actions are appropriate.”

Additional Information: Definitions and Terminology.

Suitability: The appropriateness of applying certain resource management practices to a particular area of land, as determined by an analysis of the economic and environmental consequences and the alternative uses foregone. (Regs 219.3)

Timber production: The purposeful growing, tending, harvesting, and regeneration of regulated crops of trees to be cut into logs, bolts, or other round sections for industrial or consumer use. (Regs 219.3)

Harvest cutting: An intermediate or final cutting that extracts salable trees. (SAF)

7. Levels of Early-Successional Forest (Even-aged Regeneration) (Jeffers/Mersmann)

Issue: To some members of the public, proposed levels of early-successional forest are not sufficiently justified, especially given the lack of evidence that these conditions occurred at these levels prior to European settlement. (Included are those citing Quentin Bass's contentions that even-aged management is not an appropriate model for the Southern Appalachians.) Other members of the public feel levels of early-successional forest are too low to support desired wildlife, forest health, and timber harvest conditions. Some Forest ID Teams may want to reallocate early-successional prescription options based on these comments. Such adjustments will likely require some time for reanalysis. Even if adjustments are not made, it is important to have some consistency in our rationale for proposed levels of early-successional forest.

Priority: Medium.

Background: The following are important points for responding to comments related to this issue:

- Even-aged regeneration objectives are set for specific portions of the landscape using four "Forest Successional Options" developed by the FWRBE Team. These "Options" were designed to reflect a spectrum of conditions for both early- and late-successional forest associated species. The "Options" are: 1) no management-created even-aged regeneration (Wilderness model), 2) no specific even-aged regeneration objectives, but such conditions could be created on up to 4 percent of forested land base, 3) even-aged regeneration objectives of 4-10 percent of forested land base, and 4) even-aged regeneration objectives of 10-17 percent of forested land base. Forest ID Teams were free to allocate these "Options" to the landscape as needed to meet multiple-use objectives.
- For planning purposes, early successional forests are defined as those forests regenerated using even-aged or two-aged methods, with regeneration 10 years old or less. Natural disturbances that create similar conditions will be counted toward early-successional forest objectives.
- According to the species viability analysis in the DEIS's, neither early- nor general late-successional forests are expected to be highly limiting to viability of associated species under Alternative I on any forest. In addition, neither habitat is expected to significantly decline over the next 50 years due to management actions under Alternative I on any forest.
- There is no requirement or attempt to completely recreate successional conditions that occurred prior to European settlement. However, such conditions are useful to consider (to the extent known) when planning for viability, which we have done.
- In presettlement conditions, when viewed across the landscape, forest structures very likely did not easily segregate into even- and uneven-aged conditions as a result of a variety of disturbance factors operating at multiple scales. We agree that large patches without residual older trees, similar to that created by traditional clearcutting, were likely very rare. Early-successional forests created by timber

harvests under proposed plans also will not typically create these “clearcut” conditions. In most cases harvests will result in two-aged stands, not true even-aged forests. These conditions are more similar to those that occurred historically than some commenters may envision.

- Early-successional forest objectives are set for a variety of reasons in addition to providing for species viability, including providing habitat for species in demand (grouse, woodcock, deer, turkey), providing diverse forest age structure for forest health, restoration of offsite forest types, and timber production (at least on the Piedmont districts).

To help Forest ID Teams assess their current levels of early successional forest, the following quick and dirty guidelines are offered:

Species Viability: The list of viability concern species dependent on early-successional forest is relatively small, but some do require it in larger patches (> 10 acres). It is possible to make ballpark estimates of the minimum acreage needed to support viability using basic habitat capability estimates for the species with the greatest area need. Using appropriate birds (prairie warblers, chats, golden-winged warblers) as such indicators, with desired minimum populations of 500-1000 breeding pairs, ballpark minimum acreage needed is estimated at 3500-7000 acres in early- successional forest at any time. This level is likely much less than most forests have currently proposed; therefore, species viability cannot serve as the sole justification for early-successional forest levels in most cases. Slightly higher levels than these may be justified for species viability on the basis that some of our important conservation partners believe that levels higher than that occurring historically should be maintained because abundance of fire-maintained open woodlands is so much lower now due to fire suppression. Elevated levels of early-successional forest are needed to support species viability unless, or until, sufficient restoration of these woodland habitats occurs. Uneven-aged management approaches and “natural”disturbances” are unlikely to provide necessary habitat.

Demand Species: Grouse may be the demand species with the greatest dependence on early successional forest. Research cited in our EIS’s indicate grouse occur at greatest densities where > 14 % of forest is in early successional condition. Successional Forest Option 4 is designed to provide these conditions on at least part of the landscape. Very generally, more than 10 grouse per square mile may be expected in these areas; 5-10 per square mile may be expected in Option 3 areas. These figures can be used to come up with a ballpark grouse habitat capability estimate. How many grouse are needed to meet demand? Your state game agency may be able to help answer this question. But if we shoot for 500 breeding pairs, requirements are fairly high: approximately 75,000 acres allocated to Option 4, or 150,000 acres to Option 3, or some combination of the two.

Forest Health: Keeping a diversified age structure and a good proportion of the forest in vigorous young trees can reduce impacts of some insects and diseases. Using unpublished data from UT, keeping forests under the average age of senescence

(approximately 125-175 years for common hardwoods) in a regulated forest would require 6-8 percent of forests in a 0-10 year age class. Although this might be accomplished through uneven-aged forest structures, habitat benefits and management efficiency would often be compromised.

Decisions:

Given that we want forests plans finished together, and reallocation of successional options will require some reanalysis, is it acceptable for one or more forest ID Teams to reallocate?

Do we want to supplement our current EIS analysis, to provide better justification for levels of early-successional forest or simply cover this issue in response to comments?

Do we want to try to make our justification for early successional forest more quantitative, using rationale similar to that above, or keep rationale stated in more general multiple-use terms?