



# JACKSON COUNTY

Oregon

## Board of Commissioners

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August 25, 2022

Mr. Jamie Barbour, Assistant Director  
Ecosystem Management Coordination  
United States Department of Agriculture, Forest Service  
1220 SW 3rd Avenue  
Portland OR 97204-2825

RE: Request for Information on Federal Old-Growth and Mature Forests: 87 Federal Register 42493  
(July 15, 2022); Docket Number: 2022-15185

Dear Mr. Barbour:

Jackson County, Oregon, is a County in southwestern Oregon, of which approximately 50 percent of the lands are public lands managed by Federal agencies, including the United States Department of Agriculture, Forest Service (USFS); and the Bureau of Land Management (BLM). We, the Jackson County Board of Commissioners, are the County's elected governing body and we work diligently towards our fiduciary duty to the citizens we represent regarding the public lands of Jackson County.

The County often comments on proposed agency projects, and we frequently consult with our Federal agency partners on important fire and forest management matters. As such, we would like to provide the following comments in response to the Request for Information (RFI) on Federal Old-Growth and Mature Forests:

Jackson County values its public lands, natural environment, and quality of life. Yet these values are at risk as the County continues to experience wildfires and toxic smoke that emit carbon, destroy wildlife habitat, destroy the value of timber, harm our communities, displace our citizens, threaten our water supplies, and increase costs to local taxpayers.

We depend on our Federal partners to do their part to reduce wildfire risks in the forests that they manage, and thinning overstocked forests and reducing hazardous fuels on USFS and BLM lands must be part of the solution. Unfortunately, under the current system of Federal land management, it can take years for agencies to develop and implement forest management projects. As our forests burn, our County also continues to lose access to public lands as more forest roads are decommissioned, which hinders safe and effective firefighting.

We do not see how this effort to define and inventory old-growth and mature forests addresses the wildfire and smoke crisis that is affecting our Federal lands and Jackson County communities.

Many of the Federal lands in Jackson County are already set aside from active forest management. To provide examples, much of our "old-growth" forests are already "protected" on Oregon and California Railroad Revested (O&C) Lands as Reserves under the BLM's Resource Management Plan. They are also protected as Late Successional Reserves on USFS lands under the Northwest Forest Plan, as well as lands set aside as designated critical habitat for the Northern Spotted Owl. These arbitrary management restrictions have not helped public land managers save old-growth and mature forests and wildlife habitat from severe disturbances such as wildfire, insects, and disease; the same threats highlighted by President Joe Biden in his Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. In fact, we are concerned

that the process to define and inventory old-growth and mature forests directly undermines the Biden Administration's own 10-year wildfire strategy to significantly increase forest management treatments. At a time when our County needs its USFS and BLM partners to develop and implement *more* forest health projects, this process will only divert limited Federal agency staff time and resources from where they are urgently needed.

In no case should the agencies adopt a definition based on arbitrary size, age, or diameter limits. It is an impossible and unscientific task to come up with a single definition of old-growth and mature forests that applies to many diverse forests, and forest types, across the United States. We are concerned that well-meaning, but misguided, efforts to define and inventory old-growth and mature forests at a broad level will only lead to even more arbitrary policies that limit the ability of Federal agencies to treat overstocked, fire-prone forests.

Any effort to define and inventory old-growth and mature forests should be based on local and regional planning processes that account for geographic location and region, ecosystem, and forest types. It should also rely on the expertise and experience of local land managers, and any definition or policy change affecting our national forests should be analyzed and publicly disclosed through the National Environmental Policy Act for public review and input.

This process to define and inventory old-growth and mature forests must comply with existing Federal laws, regulations, and mandates. This includes BLM and O&C Lands that are required to be managed under the principles of sustained yield for the benefit of the counties.

Wildfire, drought, insects, and diseases, and the resulting high tree mortality have reduced the ability of Federal lands to sequester and store carbon. The USFS and BLM should focus on accelerating active forest management on Federal lands to reduce the risk of severe wildfires and to improve our forests' resiliency to fire, insects, and disease, and to adapt these landscapes to the impacts of climate change.

Thank you for the opportunity to comment.

Sincerely,

JACKSON COUNTY BOARD OF COMMISSIONERS



Dave Dotterer, Chair



Colleen Roberts, Commissioner

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Rick Dyer, Commissioner

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By: Electronic Submission through the USFS Public Comment Portal

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