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**Submitted electronically to: [US Forest Service NEPA Projects Home \(usda.gov\)](https://usda.gov)
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>**

Director, Ecosystem Management Coordination
USDA Forest Service
Washington, DC

RE: Federal Register Notice: Vol. 88, No. 243 /Wednesday, December 20, 2023 Notice of Intent to Prepare an Environmental Impact Statement for Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System 88042 – 88048

Dear Project Administrator:

The Salt River Valley Water User’s Association (“Association”) and the Salt River Project Agricultural Improvement and Power District (“District”; collectively the Salt River Project “SRP”) appreciate the opportunity to provide comments in response to the December 20, 2023, Notice of Intent proposing to amend all land management plans for units of the National Forest System (Forest Plan Amendments). SRP, the Phoenix metropolitan area’s largest supplier of raw water, delivers more than 800,000 acre-feet annually to municipal, urban and agricultural water users, and also provides electrical power to more than one million customers primarily in the Phoenix area. A significant portion of the water SRP delivers derives from the forested areas in the mountains of Northern Arizona. SRP has an interest in the proper management of those forests within Arizona.

Five National Forests cover portions of the 13,000 square mile Salt and Verde River watersheds and the 70 square mile East Clear Creek watershed (“SRP Watershed”): Apache-Sitgreaves, Tonto, Coconino, Prescott, and Kaibab. In the late 1800s and early 1900s, the federal government reserved these Arizona forests to secure favorable conditions for water flows that today make up a significant portion of the water that SRP delivers.

It is with that in mind that SRP respectfully requests an extension of the comment period to allow impacted parties, such as SRP, sufficient time to review and analyze the significant revisions outlined in the NOI. The request for an extension of the comment period is justified by the complexity and breadth of the proposed action.

Implementing a nationwide Forest Plan Amendment that will change 128 forest plans should not be undertaken without proper review and consideration by impacted parties, and the current 45-day comment period does not provide sufficient opportunity to complete a thorough analysis, commensurate with the potential impacts that could be imposed by these amendments. SRP would be happy to provide further information on any of the issues addressed in this letter.

Sincerely,

A handwritten signature in black ink that reads "Elvy Barton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Elvy Barton
Manager of Water and Forest Sustainability
Salt River Project