



January 26, 2024

Linda Walker  
Director, Ecosystem Management Coordination  
USDA Forest Service  
201 14<sup>th</sup> Street SW  
Washington, DC 20250

**RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Docket FS-2022-0003**

Dear Ms. Walker,

On behalf of the Rural County Representatives of California (RCRC), we offer our recommendations on the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System (Plan Direction), Docket FS-2022-0003. RCRC is an association of forty rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

RCRC member counties are home to more than 80 percent of USDA Forest Service (USFS) land across California, and the vast majority of the state's catastrophic wildfires have profoundly impacted our rural communities. Our state's water supply, air quality, wildlife habitat, tourism economy and even affordability and availability of property insurance are highly dependent on the health and resilience of USFS lands within California's borders. Our county governments are responsible for local land use decisions and often coordinate forest resilience and community fuels treatment projects between federal land managers, key state agencies and local resource management organizations. As a result, they understand their communities and are vital to the success of planning efforts such as the Plan Direction.

Given the importance of county governments in the planning process, we are disconcerted by the omission of local government in the cooperating agency process, as proposed in the Plan Direction. As defined in 40 CFR 1501.8 and 40 CFR 1508.5, local governments assuredly qualify to request cooperating agency status, especially since the USFS has stated the intent to prepare the environmental analysis in compliance with the National Environmental Policy Act (NEPA). While we support the overlying objectives of

1215 K Street, Suite 1650, Sacramento, CA 95814 | [www.rcrcnet.org](http://www.rcrcnet.org) | 916.447.4806 | Fax: 916.448.3154

Linda Walker, USDA Forest Service  
Old-Growth Plan Direction  
January 26, 2024  
Page 2

the Plan Direction, we also acknowledge that ground-level details could have profound impacts on the communities in and around national forest system lands. County governments must be able to fully represent their residents during this process, and cooperating agency status is one of the most effective ways for them to achieve that objective.

RCRC appreciates your consideration of our comments. Please do not hesitate to contact me at [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", written in a cursive style.

STACI HEATON  
Senior Policy Advocate

cc: Randy Moore, Chief, USDA Forest Service  
Jennifer Eberlien, Regional Forester, USDA Forest Service Pacific Southwest  
Region