

CCPLA



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Director, Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250-1124

Dear Sir or Madam,

Curry Citizens for Public Land Access provides the following comments for the **Land Management Plan Direction for Old-Growth Conditions across the National Forest System, 12/20/2023**. The purpose of our group is to ensure the protection of access to public lands, by all forms of both motorized and non-motorized means, for recreation and other uses. Our membership represents a very broad and diverse group with varied interests, but we come together in our quest to maintain access to public land for current and future generations.

Background Information

The United States Department of Agriculture (Department) is proposing to amend all land management plans for units of the National Forest System (128 plans in total) to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition across planning areas of the National Forest System. The intent is to foster the long-term resilience of old-growth forest conditions and their contributions to ecological integrity across the National Forest System. This notice initiates a scoping period on a preliminary proposed action and advises the public that the Department is preparing an environmental impact statement to evaluate the effects of amending the 128 land management plans.

Comments

The scoping period (Published 12/20/23 and comments due 2/2/24) is too short of a time to allow for review of supporting documents to provide specific meaningful comments.

This proposed action was informed by public input from a Climate Resilience Advanced Notice of Proposed Rulemaking initiated in April 2023 and Executive Orders. It should have solicited comments from the public that was involved in the development of the 128 individual land management plans. Managing our Forests thru Executive Order violates the National Forest Management Act which was developed to provide multiple-use and sustained-yield of products and services.

The deciding official should be the individual Forest Supervisors which will have more knowledge of the local environment, community, and stakeholders.

This proposed action fails to strengthen local economies and communities by focusing on only one aspect of forest conditions instead of multiple-use and sustained-yield of products and services.

Scientific literature recognizes the need for ecosystem management (including early seral habitat) by stating: “ the broad goals of forest biodiversity conservation would not be scientifically viable if they focused only on one stage of a dynamic system--all developmental phases and ecological processes must be considered (Spies et al. 2009), including post-disturbance stages (fig. 3), non-forest vegetation and younger forests that constitute the dynamic mosaic of vegetation in landscapes of the NWFP area. These other stages and types have distinctive biodiversity and must be considered in any discussion of forest conservation”.

The “Land Management Plan Direction for Old-growth Forest Conditions across the National Forest System” EIS is concurrently out for scoping. It is projected to be completed after the NWFP Amendment EIS is completed. The “Land Management Plan Direction for Old-growth Forest Conditions across the National Forest System” EIS has the Secretary of Agriculture as the deciding official, so the proposed action is not subject to the objection process. So, is the NWFP Amendment making predecisional assumptions and decisions? Or will it be changed after the NWFP EIS is completed with no objections allowed?

We support managing the land and resources of the National Forest System to provide for **multiple-use** and sustained –yield of products and services.

We encourage more local public and county engagement.

Thank you for the opportunity to comment.

/s/ Thomas P. Hawkins

THOMAS P. HAWKINS
CCPLA Chair

/s/ Michael A. Miller

MICHAEL A. MILLER
CCPLA Environmental Coordinator