



February 1, 2024

Submitted Online Via [Webform](#)

Linda Walker
Acting Director
Ecosystem Management Coordination
United States Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System – Notice of Intent to Prepare an Environmental Impact Statement

Dear Acting Director Walker:

The California Farm Bureau appreciates the opportunity to provide comments on the United States Forest Service's (Forest Service) Notice of Intent to prepare an Environmental Impact Statement regarding a national plan to amend all 128 land management plans for units of the National Forest System for the purposes of old-growth forest conditions.

California Farm Bureau is California's largest farm organization, comprised of 56 county Farm Bureaus, currently representing approximately 28,000 agricultural, associate, and collegiate members. Farm Bureau strives to protect and improve the ability of farmers, ranchers, and foresters engaged in production agriculture to provide a reliable, safe, and affordable supply of food and fiber through responsible stewardship of our natural resources.

California agricultural producers have a vested interest in the management directives of National Forests as land management plans can impact routine agricultural activities and rural economic viability. For example, sawmill and other infrastructure, heavily dependent on a reliable wood supply from our National Forests, plays an essential role in the rural economy and provides a destination for wood resulting from the sustainable management of both private and public lands. The California ranching industry also relies on the rangeland available on National Forests while at the same time providing valuable wildfire fuels mitigation to public land. What a land management plan deems old growth, as well as any increase in connectivity of old growth, has the potential to greatly impact other multiple use activities if the two are deemed incompatible. We are especially concerned about the impacts of a nationwide land management plan amendment to timber harvest and livestock grazing.

Executive Order 14072 directed the Forest Service and the Bureau of Land Management to inventory lands under their control to determine the extent of old growth forests. Table 1 in



the agencies' completed initial inventory identifies 24,400,019 acres of old growth on National Forest lands with over 54% of these acres in protected (wilderness, inventoried roadless area, and national monument) areas. The Federal Register notice (page 88044) also states that *"current data has identified approximately 2,700 land management plan components, across all 128 individual plans, which provide direction on the management, conservation, or monitoring of old growth forest conditions across the National Forest System."* Additionally (page 88046), *"the structure and composition of old-growth forests is highly place-based and can range from old, multi-layered temperate coniferous forests with high amounts of dead wood in the form of standing snags and coarse wood to old, single-storied pine forests or oak woodlands with open canopy structure and fire-maintained herb and litter dominated understories."*

Land management plans are already inclusive of old growth directives and those directives are reviewed and updated as appropriate during plan revision. Additionally, the Federal Register notice acknowledges that old growth forest conditions are varied, requiring extensive consideration of age, tree size, stand structure by forest type and by stands, etc. Although the Notice of Intent contends that a nationwide plan amendment will boost consistency across National Forests, we believe the data and conclusions referenced above supports localized, adaptive processes rather than a top-down approach. California Farm Bureau requests that the Forest Service reconsider the current proposal and instead continue forest-specific land management planning processes that leverage local coordination and robust engagement from impacted stakeholders and members of the public.

California Farm Bureau is also concerned about the impact a single, nationwide plan amendment solely focused on old growth would have on other critical Forest Service priorities such as the 10-year strategy for confronting the wildfire crisis. In recent years, wildfires have caused numerous direct and indirect impacts on California's \$50 billion agriculture industry. In addition to being a significant public safety threat, many farms, ranches, wineries, employee housing, equipment, livestock, and commodities have been directly damaged or completely destroyed. For those only partially impacted, they are faced with the reality of rebuilding what remains of their operation. Because many farmers and ranchers live on the farm, some have also lost their home simultaneous to losing their farm and income. In addition to these devastating economic impacts, catastrophic wildfire has greatly harmed California's natural resources including air quality, forested watersheds that serve as headwaters for critical water supplies, as well as wildlife habitat. Given the critical nature of this work, coupled with wildfire being a significant threat to old growth, we urge the Forest Service to remain focused on their prioritization of combatting destructive wildfire.

California is home to 18 National Forests with each forest having a unique, dynamic system subject to numerous factors including, but not limited to, insect and disease devastation, drought, and catastrophic wildfire. We believe our forests, stakeholders, rural communities,



and members of the public would be best served through individual plan revisions informed by local and current forest conditions. For this reason, we urge the Forest Service to continue its long-standing practice of amending land management plans at the forest level. If questions about these comments, please contact Erin Huston at ehuston@cfbf.com.

Sincerely,

A handwritten signature in black ink that reads 'Shannon Douglas'.

SHANNON DOUGLASS
President