



February 1, 2024

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

Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest system – NOI to Prepare and EIS

Dear Acting Director Walker:

Baker County, Oregon appreciates the opportunity to provide comments on the US Forest Service's (USFS) Notice of Intent to prepare and 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.

Baker County spans 3,089 square miles (1,976,960 acres), making Baker County larger than the states of Rhode Island or Delaware. Federal agencies manage approximately 51.5% of the land in Baker County, comprising a total of 1,016,511 acres. Approximately 33% of the County is managed by the US Forest Service (USFS), 18.5% is managed by the Bureau of Land Management (BLM) 3, and an additional 10,067 acres, or 0.5% of Baker County, is managed by the State of Oregon. The remaining 48% of the land in the county, approximately 950,382 acres, is privately owned. The citizens of Baker County rely on *both* public and private land for natural resources, recreation, and the ability to continue our way of life—especially agriculture and livestock grazing, mining, and timber harvest; therefore, all decisions affecting public lands affect Baker County's economy, customs, culture, and enjoyment of the land.

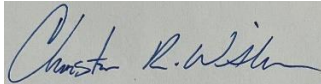
Baker County residents have a vested interest in the management directives of the National Forests, especially as it affects the Wallowa-Whitman National Forest. Land Management plans can impact the availability of multiple use activities on public lands.

The County is concerned about the impact a single, nationwide plan amendment, solely focused on old-growth would have on other critical USFS priorities. The County urges the USFS to continue to prioritize combatting wildfires that also destroy old-growth forests.

USFS land management plans are already inclusive of old-growth directives and get reviewed and updated, as appropriate, through plan revision. This top-down administratively driven management of the national forests is not beneficial and must be left up to the local experts that live and work on the land daily. The Federal Register acknowledges that old-growth conditions are varied and involve several considerations. This acknowledgement alone supports localized, adaptive processes. The local foresters and land managers must have the flexibility to treat and manage specific areas of old-growth forests on a site-specific basis, within the existing parameters of the NEPA process.

Baker County requests that the USFS reconsider the current proposal and continue forest specific land management planning processes that use local government coordination and involved engagement from the public and impacted stakeholders.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christina R. Witham", is written over a light gray rectangular background.

Commissioner Christina Witham
Baker County Commission