



September 20, 2024

*Comments Submitted Via [Webform](#)*

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

**RE: Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System, Draft 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) Draft Environmental Impact Statement (DEIS) for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System.

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. For these reasons, California Farm Bureau previously submitted comments on the Forest Service's Notice of Intent (NOI). We also offer the following comments for the Forest Service's full consideration



and enjoin these comments with those submitted by the American Forest Resource Council and partners.

### **Planning Should Be Locally Led**

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. As such, 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. 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 for the NOI acknowledged that old-growth forest conditions are varied, requiring extensive consideration of age, tree size, stand structure by forest type and by stands, etc.

A nationwide plan amendment will not boost consistency across National Forests. In fact, the data and conclusions reached in the agencies' initial inventory supports localized, adaptive processes rather than a top-down approach. Forest-specific land management planning processes that leverage local coordination and robust engagement from impacted stakeholders, local government entities, and members of the public is best.

### **Competition With Other Forest Service Priorities**

California Farm Bureau remains extremely 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. Because many farmers and ranchers live on the farm, some have also lost their home simultaneous to losing their farm and income. Catastrophic wildfire has also greatly harmed California's natural resources including air quality and forested watersheds that serve as headwaters for critical water supplies, as well as wildlife habitat.

Given the critical nature of wildfire prevention work, coupled with wildfire being a significant threat to old-growth, we are concerned that the action-based alternatives would further burden and constrain active management. The Threat Assessment confirmed that wildfire, insects and disease have caused the highest loss of old-growth forests over the past 20 years and will continue to pose the most significant future threat to those forests. The Threat Assessment also concluded that old-growth loss was greater in areas reserved from timber harvest than in those areas where timber harvest is allowed and encouraged. We urge the Forest Service to remain focused on their prioritization of preventing destructive wildfire and



consider the impact the chosen Alternative will have on management strategies that reduce wildfire risk.

**Conclusion**

Due to the concerns expressed above, California Farm Bureau strongly urges the Forest Service to select Alternative 1, or the no-action alternative. However, should the Forest Service select an action alternative, we urge the Forest Service to be mindful of the immediate impacts to the Northwest Forest Plan and other projects currently in the National Environmental Policy Act planning process. We also urge the Forest Service to include language in the final decision allowing those project to proceed unaffected by the Amendment.

If questions about these comments, please contact Erin Huston at [ehuston@cfbf.com](mailto:ehuston@cfbf.com).

Sincerely,

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

SHANNON DOUGLASS  
President