

BEAVERHEAD-DEERLODGE WORKING GROUP

September 20, 2024

Thomas J. Vilsack
Secretary of Agriculture
Department of Agriculture
Submitted via Federal eRulemaking Portal www.regulations.gov

Re: Draft Environmental Impact Statement - Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Dear Mr. Vilsack,

The Beaverhead-Deerlodge Working Group (BDWG) is an independent group that works collaboratively on issues relevant to the Beaverhead-Deerlodge National Forest, the surrounding lands, and communities. The BDWG does not include Forest Service employees and is not utilized or directed by the Forest Service.

This comment letter addresses the Forest Wide Old Growth Amendment process. We appreciate the opportunity to participate in the public comment period and your consideration of this letter.

The BDWG supports maintaining consistency in how Old Growth is analyzed along with the ability to manage Old Growth stands. Mechanical treatments and prescribed fire are proven to improve forest resiliency to primary threats, as stated in Analysis of Threats and the Draft EIS, against wildfire, insects, and disease. This is especially important in the Wildland Urban Interface (WUI). So maintaining the current and consistent analysis helps protect communities.

The Beaverhead-Deerlodge National Forest (BDNF) is in Region 1. We support the continued use of the Green et al. definition of Old Growth at the regional level and regional standards.

There are several concerns from our perspective that we'd like to bring to your attention. Amending the plans with new standards violates the 2012 Rule, primarily through collaboration and cooperation. The BDWG is a local collaborative representing diverse interests in the landscape and county commissioners. The 2012 Rule requires engagement and outreach to such groups, and this didn't take place.

The Forest Service is required to conduct a two-year adaptive strategy analysis after the amendments are completed. The BDNF doesn't have the staff or capacity to complete this analysis without negative impacts on ongoing essential and current projects.

The Forest Service didn't provide a socio-economic analysis indicating a finding of no significant impact (FONSI) to the timber industry, local communities, and the states.

The Environmental Impact Statement (EIS) and Standards are conflicting. The standards need to be broadened and simplified to reflect the level of detail in the EIS narrative.

The Beaverhead-Deerlodge Working Group recommends the following actions:

1. Add capacity to the Forest Service to conduct and complete the two-year adaptive strategy
2. Engage local governments and people as directed by the 2012 Rule

Again, thank you for the opportunity to respond to the Draft EIS. There are areas we support and areas that are of concern. We hope our feedback assists in making this effort stronger and more equitable for people and communities impacted by these amendments.

Thank you for considering this letter.

The Beaverhead-Deerlodge Working Group:

Sean Steinebach, Co-Chair, Sun Mountain Lumber

Vaia Errett, Co-Chair, Jefferson County Parks, Trails, Recreation

Dan Sager, Powell County

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Tom Rice, Beaverhead County

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Kerry White, Citizens for Balanced Use

Sally Schrank, Greater Yellowstone Coalition

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