



September 20, 2024

Jennifer McRae
U.S. Forest Service
1400 Independence Ave, SW
Washington, D.C. 20250

Dear Ms. McRae:

The Public Lands Council (PLC) appreciates the opportunity to provide comments on the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) regarding "Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System," (NOGA, or "Amendment"). PLC represents cattle and sheep producers in the Western U.S. who hold 22,000 federal grazing permits and their unique interests that such a production scenario creates. Together with our 14 state affiliates and 3 national industry association affiliates, we have significant interest in an improved forest management strategy and a fire regime that does not pose an increasing liability to public lands ranchers year after year.

PLC has grave concerns about the approach suggested in the preferred alternative. To date, catastrophic wildfire has burned nearly 7 million acres across the West in 2024 alone. Suppression costs have skyrocketed, as have the number of acres left untreated and at risk after fire due to USFS budget and personnel constraints. Repeatedly, we have seen USFS stymied by layers of bureaucratic process and self-imposed limitations on active management that would reduce fire risk, only to watch acres burn – and then reburn – following years of inactivity.

Federal forests are facing increasing threats from fire, drought, insects, and damage from unmanaged multiple use. PLC is concerned the preferred alternative would require additional staff burden to evaluate and approve even the most basic projects, but would represent another litigation risk for agencies attempting to carry out Congress' mandates.

PLC supports retention of the no-action alternative. While the status-quo for management of federal forests has yielded poor, high-risk results, it is undoubtedly the preferential pathway to the addition of prioritization of old-growth. We oppose implementation of the preferred alternative for the following reasons:

1. The preferred alternative creates untenable budgetary and personnel demands on the agency. USFS is currently undergoing catastrophic budget issues that have caused the cessation in hiring of seasonal personnel and contraction of crucial programs. Addition of requirements to prioritize and preserve old-growth will add layers of planning complexity the agency does not have the capacity to withstand. Hazardous fuels reduction projects will

be stymied, and the addition of mandated analysis of old-growth characteristics will be sufficient to give any agency personnel pause when beginning a potentially contentious project.

The agency's budgetary shortages will be made all the more challenging as a result of the agency's election to amend forest plans on this scale, rather than focusing on conducting crucial forest management work. Changes to forest plans on this scale are unprecedented, and pursuit of time-consuming policy changes that will require reevaluation of hundreds, if not thousands, of resultant decisions is imprudent.

2. The agency's analysis of the preferred alternative under the National Environmental Policy Act (NEPA) is insufficient. NEPA requires the agency to take a "hard look" at impacts to specific areas and overall communities, and the draft EIS does neither. Many of the statements made about the benefit of old growth, particularly related to carbon stocks and biodiversity, rely on assumptions about the overall health of the ecosystem – assumptions that are unfortunately inaccurate based on current forest conditions.
3. Further, the evaluation of social, economic, and socioeconomic impacts is insufficient. The draft EIS says the agency found "no anticipated impacts to livestock grazing opportunities on National Forest System lands, nor impacts to the economic and social well-being of permittee holders." This evaluation is either intentionally vague or a representation of a larger issue in the agency; PLC believes the draft EIS failed to consider the thousands of forest allotments that depend on comprehensive forest management to promote suitable conditions for grazing – or at the very least, avoid conditions that exacerbate the risk of catastrophic wildfire. The preferred alternative fails to acknowledge that the focus on retention of old growth will necessarily reduce management of some of the most likely fuels in catastrophic wildfire scenarios, and will limit the ability to improve roads, access points, and limit the use of tools that are necessary during a mixed forest-grazing management plan. The interaction between grazing and forest management is inextricably linked, so a plan that limits the use of tools in one inherently jeopardizes the other.
4. The preferred alternative will increase the risk of catastrophic wildfire outside the Wildland Urban Interface (WUI). The draft EIS identifies approximately 25 percent of the WUI exhibits characteristics that the plan wishes to protect. In order to meet the agency's other goals of reducing risk to human life and infrastructure, deprioritization of old growth in the WUI will result in the agency placing a much heavier prioritization on retention of those characteristics in the backcountry. Grazing, headwaters, wildlife habitat, and other crucial multiple-use considerations exist in the backcountry, so an increased tendency toward "hands off" management in the backcountry will have catastrophic results for fire mitigation for those other uses.

Each of the provisions in the action alternatives add unnecessary and damaging layers of management expectations on an agency already struggling to carry out Congressionally-mandated expectations for forest management. While PLC appreciates the need to forest management and land use plans can remain responsive to current needs, we believe the proposed actions will make it more difficult for the agency to properly balance multiple use while mitigating the ever-present

threat of fire risk. We remain concerned that “protecting old growth” is simply being used as a proxy to reduce the agency’s tools to manage forested ecosystems. Such an approach is a liability to both the agency and all who utilize and depend on these resources. Adoption of the preferred alternative, or any of the alternatives other than the no-action alternative, will provide fodder for litigious intervention from those who pursue a permanent “hands-off” approach.

PLC appreciates the opportunity to provide comments on the draft EIS and understands the complexities that prompted drafting of the NOGA, however we believe that due to fire risk, failure to adequately manage tree stands, failure to meaningfully protect multiple use, and the impacts to local economies, implementation of NOGA would result in loss, not protection, of old growth characteristics across the nation’s forests. We urge you to retain the management in the no-action alternative, and remain committed to engaging with the agency through this process to sustain multiple-use management into the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Kaitlynn Glover". The signature is fluid and cursive, with a horizontal line at the end.

Kaitlynn Glover
Executive Director