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To: [Waterston, Beth ann - FS, OR](#)
Subject: FW: [External Email]Comments on Forest Service Manual 2470
Date: Tuesday, November 5, 2024 11:09:13 AM
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Sent: Monday, November 4, 2024 3:43 PM
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Subject: FW: [External Email]Comments on Forest Service Manual 2470



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From: Danielle R. Bettencourt <DBettencourt@fwlaw.com>
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Ms. Miller,

Attached please find the Coalition of the Local Government's comments on the Forest Service's revisions to Manual 2470 – Silvicultural Practices. Thank you for the consideration of these comments.

Regards,

Danielle



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COALITION OF LOCAL GOVERNMENTS

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COUNTY COMMISSIONS FOR SWEETWATER, LINCOLN, AND UINTA - WYOMING, AND DAGGETT-UTAH; AND
CONSERVATION DISTRICTS FOR LINCOLN, LITTLE SNAKE, STAR VALLEY, SUBLETTE, SWEETWATER, AND UINTA -
WYOMING

October 28, 2024

VIA EMAIL: stephanie.miller2@usda.gov

Stephanie Miller
Assistant Director for Future Forest
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Lakewood, Colorado 80215

Re: Comments on the U.S. Forest Service's Revisions to Manual 2470 – Silvicultural Practices

Dear Ms. Miller,

The Coalition of Local Governments (“Coalition”) submits the following comments on the U.S. Forest Service’s revision to Forest Service Manual 2470 – Silvicultural Practices. These revisions include, among others, the consideration for the stewardship of old-growth forests during development of silvicultural prescriptions. Coalition members have been cooperating agencies with the Forest Service during its efforts to develop national land management plan direction for old-growth forest conditions. The Coalition does not generally support the national level plan amendment for old-growth forests and instead encourages forest-specific management direction. However, the Coalition does agree with the need to proactively manage old-growth forests and all other age-stands of forests across the National Forest System to reduce fuel loads and restore forest health. The amendments to the Manual 2470 provide additional support for actively managing the National Forest and the Coalition generally supports the revisions subject to the following comments.

I. STATEMENT OF INTEREST

The Coalition is a voluntary association of local governments organized under the laws of the State of Wyoming to educate, guide, and develop public land policy in the affected counties. Wyo. Stat. §§ 11-16-103, 11-16-122, 18-5-201; Utah Code § 17-27a-102(1)(a). Coalition members include Sweetwater County, Uinta County, Lincoln County, Daggett County, Lincoln Conservation District, Sweetwater County Conservation District, Uinta County Conservation District, Sublette County Conservation District, Little Snake River Conservation District, and Star Valley Conservation District. The Coalition serves many purposes for its members, including the protection of vested rights of individuals and industries dependent on utilizing and conserving

existing resources and public lands, the promotion and support of habitat improvement, the support and funding of scientific studies addressing federal land use plans and projects, and providing comments on behalf of members for the educational benefit of those proposing federal land use plans and land use projects.

Both the Counties and the Conservation Districts have authority to protect the public health and welfare of Wyoming citizens while promoting and protecting public lands and water resources. Wyo. Stat. §§ 11-16-122, 18-5-208; Utah Code § 17-27a-102(1)(a). Districts have statutory authority to develop and implement comprehensive resource use and management plans for range improvement and stabilization, conservation of soil, water and vegetative resources, control and prevention of soil erosion, and for flood prevention. Wyo. Stat. §11-16-122(xvi). Districts' jurisdiction includes matters pertaining to the acquisition, construction, operation or administration of any land utilization, soil conservation, erosion control, erosion prevention, flood prevention projects, conservation of water, water utilization, disposal of water in watershed areas, and other water projects. Wyo. Stat. §11-16-122(xix). In carrying out this statutory authority, Districts are working "to stabilize ranching and farming operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health, safety and general welfare of the people of this state." Wyo. Stat. § 11-16-103(b). Districts also work cooperatively with federal agencies in the development and implementation of federal land use plans to ensure consistency with local land and resource plans. Wyo. Stat. § 11-16-122(viii).

By statute, Wyoming Counties are "deemed to have special expertise on all subject matters for which it has statutory responsibility, including but not limited to, all subject matters directly or indirectly related to the health, safety, welfare, custom, culture and socio-economic viability of a county." Wyo. Stat. Ann. §18-5-208. As such, Counties "may regulate and restrict . . . the use, condition of use or occupancy of lands for residence, recreation, agriculture, industry, commerce, public use and other purposes in the unincorporated area of the county." Wyo. Stat. Ann. §18-5-201. Daggett County also possesses the general land use authority to protect the tax base, foster the state's agricultural and other industries, facilitate growth, and provide for the health, safety, and welfare of its citizens. Utah Code § 17-27a-102(1)(a)(i)-(ii), (iv), (vi).

II. COMMENTS ON THE PROPOSED SILVICULTURAL PRACTICES REVISIONS

1. Old-Growth Definition – During cooperating agency meetings on the National Old-Growth Plan amendment, the Forest Service stated that old-growth definitions would be added to the Silviculture Manual. This language/definition should be added to the Manual and available for the public to comment on.
2. Section 2471.03 Policy – The Manual states: "Base detailed prescriptions, upon current stand and desired conditions. Consider interdisciplinary input, including climate science, indigenous knowledge, and stewardship of old-growth forest." This "policy" appears to just be checking the box on stating these three components. The detailed prescriptions

should also consider state and local governmental input, specifically from the State Forestry, the State Game and Fish Department, Department of Agriculture, and specific to Wyoming, the Conservation Districts. All groups work cooperatively with the Forest Service through stewardship programs and/or cooperating agency roles to implement vegetative treatments within National Forests to enhance forest health.

3. Section 2472.3 Reforestation Process – The Manual states: “Practice climate-informed reforestation consistent with land management plans, considering reforestation objectives relative to climate change, while factoring current survival and success for predicated long-term species shift.” While this may sound good on paper, the Coalition cautions that reforestation decisions not be based entirely on “climate change” because the predictions of how the climate will change in the future are constantly evolving and difficult to predict. The key for forests to be adaptable and resilient to any type of stressors is to ensure that diverse successional stages are represented throughout the National Forests.
4. Section 2475.02 Genetic Resources Management Objectives – The Manual focuses on “provid[ing] climatically and genetically appropriate diverse native plant material with increased resistance and resilience to especially damaging pests (such as, insects, nematodes), pathogens, and current and project changes in climate.” The Coalition repeats its comment above regarding resilience to projected climate change. To ensure resilient National Forests, there must be continuous active management, including vegetative treatments like thinning, harvesting, and burning, and a recognition that uneven age stand forests are more likely to withstand natural stressors (i.e. wildfire, insects, and disease).
5. Section 2475.03 Genetic Resources Management Policies – The Coalition appreciates the policy of collaborating and coordinating with State, Private, and Tribal Forestry, and other State agencies, industries, and private landowners when conducting genetics programs. The Forest Service should also include collaborating with local government agencies, including Conservation Districts.

III. CONCLUSION

The Coalition appreciates the opportunity to comment on the revisions to Forest Service Manual 2470 and its members look forward to continued coordination and collaboration as treatments are planned and implemented on the National Forests.

Sincerely,



Eric South, Chairman
Coalition of Local Governments