



March 17, 2025

USDA Forest Service

1220 SW 3rd Ave Ste. G015

Portland, OR, 97204

Mendocino County Farm Bureau (MCFB) is a non-governmental, nonprofit, voluntary membership advocacy group whose purpose is to protect and promote agricultural interests throughout the county and to find solutions to the problems facing agricultural businesses and the rural community. MCFB is submitting comments on the Northwest Forest Plan Amendment. Our comment will primarily focus on the impacts to the management of Mendocino National Forest (MNF).

Our preferred option is Alternative B. National Forests are public assets that should be managed as working forests that earn a return on investment by contributing to local economies through timber sales and grazing allotment fees. Active management ensures adequate resources are available to environmentally steward the land through proper monitoring and maintenance. Timber harvesting and the production of wood products are critical industries for many rural communities, Mendocino County included. In 2021, the total value of wood products at the mill was over \$93 million dollars, exceeding wine grapes which were valued at \$84.5 million. Our public forests require investments to properly manage the forest, and those investments are funded through timber sales. When there isn't an adequate number of timber sales approved, there isn't an adequate level of revenue generated to support the work required to maintain forest resiliency and water quality. Lacking the revenue and resources necessary to invest in our public forest deprives our community the ability to fully benefit from our public lands in terms of contributing to our local economy, workforce stability and industry capacity.

In 2020 during the August Complex Fires, 612,000 acres out of 913,000 acres burned in Mendocino National Forest. 43% burned severely which equates to over 25% of the entire Mendocino National Forest. Both before and after the fire, there hasn't been enough movement on active management of MNF due to court challenges by environmental groups and lack of Forest Service bandwidth to get projects approved and implemented. There have been some successes such as the Plaskett-Kellar Hazard Tree Removal Project which encompasses 4500 acres. While we appreciate any level of success, 4,500 acres being treated is a drop in the bucket when put in the context of 200,000+ acres needing treatment.

While there are many elements in the NWP amendment that we support, there are some glaring deficiencies such as the role grazing allotments and their management play in the management of Mendocino National Forest. Grazing allotments aren't even mentioned. While grazing may not directly affect timber production, it does play a vital role in promoting forest resistance and resilience to fire which does directly affect timber production. We hope to see that this omission is addressed by updating the Mendocino National Forest Ecological Restoration Plan.

We like that there is an acknowledgement that climate change will produce challenges regarding the forest's ability to resist being ravaged by wildfire and that dry forest treatment will be necessary to increase resiliency. Alternative B calls for a very aggressive goal in the number of acres treated per year to achieve resistance and resilience. We hope that this commitment isn't just in name only and that adequate resources are committed to funding, implementing and carrying out these treatment plans. Currently, there are inadequate resources and staff available to manage MNF at a level that would restore its place as a part of the working landscape that is contributing to our local timber industry through timber sales and restoration treatment work contracts.

While we are encouraged to see some much needed changes being proposed in Alternative B, we are also realistic about the challenges in ensuring policy changes result in tangible results. Given the deficit management in recent decades at the MNF, from road maintenance, to fire restoration at the scale required, MCFB is asking that the NWP require Region 5 to oversee and support individual forests that lack capacity or initiative. We hope the ecological restoration plan can address who is ultimately responsible for basic land stewardship objectives being met. We also hope the NWP will emphasize the need for private companies to partner with the forest, and that Registered Professional Foresters be required when performing forest treatment planning and implementation in California, when adequate federal staff is not available.

We share in the goal of a healthy forest that is fire resilient. The only way to ensure proper management is viable at the MNF is through production of wood products. While maximum sustain production is no longer what society expects of our forest, no management has been both an ecological and economical crisis for the MNF. It is a duty of the Region to ensure adequate management and staffing is carried forward as present in the NWP.

A handwritten signature in black ink that reads "Estelle Clifton". The signature is fluid and cursive, with the first name "Estelle" and the last name "Clifton" clearly distinguishable.

Estelle Clifton, Mendocino County Farm Bureau board president