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Organization: Modoc County, CA

Title: Director of Natural Resources

Comments: RE: Comments on Federal Register 42493-42494Yo1.87, No. 135 July 15, 2022

Dear Mr. Barbour:

Modoc County (County) appreciates the opportunity to comment on the above referenced Federal Register Notice. The County works closely with the Modoc National Forest (Forest) on many types of projects, including forestry related projects. We have great concerns about the proposal to define and inventory "old growth and mature forests" on the Forest.

The historic track record of completing inventories by the federal land management agencies is abysmal. They are never completed on time, which means that time and resources that should be spent doing productive projects are diverted away from those efforts to actively manage the forests and provide for local economic stability. We believe there is no valid science based reason for this proposal. It appears to be entirely political in nature. The end result, if this directive moves forward, would be to increase the amount of forested acres that would be off limits to active management and an increase in acreage that is susceptible to wildfire.

There are vast amounts of National Forest lands that are already "protected" from active management like Roadless Rule areas, Congressionally designated wilderness/wild and scenic land (just these three categories amount to more than half of the total Forest Service acres) and a multitude of other restricted overlays. The neighboring Klamath National Forest has only 5 percent of its lands without restrictions. In addition, there are the millions of acres that have already burned.

The Forest Service has just produced a 10 Year Strategy for treating over 20 million acres in response to the overwhelming risk of wildfire. This is supposed to be the top priority for the agency. This proposal appears to be designed to both divert resources away from this critical undertaking and actually to remove acres from being eligible for treatment.

The President's Executive Order identifies "climate impacts, catastrophic wildfires, insect infestations and disease" as threats to all forests. In California, the science shows that actively managed forests sequester more carbon than unmanaged ones. In order to get to that state, significant increases in pace and scale of management/treatment must occur. The end result of this old growth inventory would clearly be a reduction in the land mass available for this necessary management with no scientific basis for that reduction, as well as siphoning off untold millions that could be used for treatment.

The quest for a one size fits all definition of old growth is a fruitless effort. It is impossible and an unscientific task to come up with a single definition and to what end? There are dozens of vastly different ecosystems throughout the National Forest system. This small forest in northeastern California contains enough variety that it would be difficult to craft a definition that would be useful just on the Modoc. We have six inch lodgepole pine trees that are over 100 years old and yet ponderosa pine on good sites, even in our difficult growing conditions, that can be that big in 25 years.

The effort to define old growth has been dealt with more than once and without a satisfactory outcome, if the desire is to have one definition. Again, we ask, to what end? If old growth requires protection, then allow the local experts to continue to design their management schemes to accommodate the local ecosystems and conditions. However, old growth should be conserved, rather than preserved, if the top priority is to remain treating the landscape to address catastrophic wildfire. The failure to actively manage national forests and the resulting

wildfires has done more to impact old growth negatively than anything land managers could do to enhance it.

Rather than focusing on addressing the ongoing crisis wildfire confronting our national forest through actively managing them and adopting appropriate climate adaptation strategies, the agency would have to pivot and spend important time and resources defining and inventorying old growth across numerous diverse and complex forest systems with different tree species, sizes and incredibly ranging climate and site variance.

The County fails to see how counting up all the old trees and having a one-size-fits-all definition of them does anything at all to accomplish the top priority of protecting the forests from the impacts of climate change (catastrophic wildfire), In fact, it does the opposite. This effort would significantly affect the Forest's Program of Work and negatively impact our citizens that depend on the Forest for their livelihood, recreation and wellbeing.

We strongly urge you to abandon this proposal and allow your land managers to continue with ramping up their implementation of appropriate forest management to provide for resilient forests and healthy ecosystems.

Sincerely,

Sean Curtis

Director