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Title:
Comments: Custer County, Idaho Comments on Federal Register / Vol. 88, No. 243 / Wednesday, December 20, 2023 and Custer County Land and Resource Mgmt Plan are attached to this submittal.

The United States Department of Agriculture (USDA) is proposing to amend all land management plans for units of the National Forest System (128 plans in total) to include "consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition across planning areas of the National Forest System".

On behalf of Custer County, Idaho, I am requesting cooperating/coordinating agency status for the County on this EIS due to Custer County's specific expertise and specialized knowledge of the ecology and economics of land management including timber management in the northwest USA.

The plan amendments could have significant effects on the economic wellbeing of Custer County, Idaho and its constituents. The County requests participation in the process to assure resources, local knowledge and impacts are fully documented and analyzed.

Please include the attached Custer County Public Land Resource Management Plan (Custer County LMP) in the EIS analysis. Custer County requests the US Forest Service recognize in writing that forest and woodland health needs to be restored to the historical range of variability, including, but not limited to composition, age, size and density in accordance with ecologic site description.

This Custer County LRMP describes in detail the need to restore resilience and resistance to fire, insects and other disturbances through the use of sustainable silviculture practices. The plan describes the desired future conditions in forests and woodlands within the County including restoration of the historical range of variability, including but not limited to composition, age, size and density in accordance with ecologic site descriptions.

The attached County LRMP defines true conservation as "the wise use and management of natural renewable resources that enhances the land for benefits of the land, man, and the animals."
Custer County requests participation in the EIS analysis process to assure documentation of history that can be used to make more informed decisions going forward. For example, the hands-off method of management for Yellowstone National Park since the last 1970s resulted in catastrophic fires starting in approximately 1988. The consequences of the hands-off management mentality of forest management left Yellowstone with ground scorched and sterile, preventing the normal regrowth of vegetation for years to come. The loss of ground cover resulted in massive mud slides, soil degradation, and erosion. Air quality and water quality were negatively impacted for years to come. The death of many park animals were the result of the extreme fires and the absence of feed because of the fires. Custer County residents have the history and memories of the past, often overlooked by short term federal employees during NEPA analyses.Custer County residents have seen a change in the US Forest Service. They are concerned that agencymemory is becoming too transient. Forest Service personnel used to spend the majority of their time in the field. Forest Service employees knew the resources and the people. Income was generated from renewable natural resources. The citizens of Custer County have watched the Forest Service as it accomplishes less, pushes more paper, and costs the taxpayers of this county billions of dollars a year fighting fires. The forest fires have cost the lives of people who live and work in the area.Universities throughout the western US have professors and students studying forestry. New relevant data about the genetics of fire resistance, soil moisture and temperature at various stocking densities, and more is coming out each year. Remote sensing technologies including satellite and drone-based data, coupled with ground truthing, is changing our understanding of forest practices.The County requests additional emphasis on

modern science, Forest Service District Rangers and forestry staff with degrees in silviculture and related production fields, and a science driven approach to modern day forestry. Custer County will bring balance to climate change and carbon sequestration theories.With the use of artificial intelligence by federal agencies and their consultants to speed up the NEPAwriting process, we see a need for outside parties to provide federal agencies with the scientificresources they may otherwise overlook. The current bias in US Forest Service databases, limitingdigital publications to those that support certain opinions and outcomes needs to be addressed.Digital libraries need to be much more comprehensive or the answers generated by artificial intelligence will be mere hallucinations. When artificial intelligence does not know the answer to a question, it mkes up a fake response. by limiting the Forest Service digital database over the past twenty plus years, the agency has already polluted potential NEPA analysis outcomes.We look forward to working with the Forest Service to ensure the decisions made going forward will achieve these goals and objectives of restoring forest / woodland health and ecological site conditions. This includes developing target values for successional stages, age diversity, basal area, tree density, and spatial diversity for forests and woodlands within their jurisdictions and using a full database for a robust analysis.Custer County EIS participation will help foster collaboration and trust among government agencies,conservation organizations, scientists, local communities, and other stakeholders. Custer County will workwith the US Forest Service towards adaptive management approaches, which involve learning from ongoingexperiences and adjusting strategies accordingly, for long-term forest management goals.Respectively submitted byDarling Geomatics on Behalf of Custer County, IdahoMary DarlingNatural Resource ConsultantAttachment: Custer County Public Land Resource Management Plan, Rev 2019 (Custer Co ID Land Management Plan AttchmtA.pdf)ATTACHMENT: Custer Co ID Comments Old Growth EIS NOI.pdf is letter content.