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Organization: Adams County, ID BOCC

Title: Adams County Prosecuting Attorney

Comments: RE: 88 FR 88042 Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

FS-1215a Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed the Forest Service and Bureau of Land Management Fulfillment of Executive Order 14072, Section 2(b)

87 FR 24851 POTUS EO 14072 Strengthening the Nation's Forests, Communities, and Local Economies April 22, 2022

Executive Order 14072 also applies to the Bureau of Land Management, but this notice of intent applies to National Forest System lands only.

To: Responsible Official, Thomas J. Vilsack, US Secretary of Agriculture:

I am providing Scoping Comments as the Adams County Prosecuting Attorney and on behalf of the Adams County, Idaho, Board of County Commissioners.

As we work very diligently to engage with both the Forest Service and BLM, we have not been included as per the FS and BLM CFR's, Cooperating Agency Status. Please correct this oversight in section below:

"Lead and Cooperating Agencies

The Forest Service will prepare the environmental analysis in compliance with the National Environmental Policy Act and operate as the lead agency for this amendment. State agencies and Federally recognized Tribes and Alaska Native Corporations are invited to indicate interest in participating as a cooperating agency."

The Need for Change cannot be determined unless driven locally and with the perspective of the true heritage of all persons with indigenous ancestry who lived, worked, and conserved responsibly the lands and resources in their communities throughout history and today. They understood and applied their experience and science of the day to not management one resource over another, as they understood the consequences if they did.

When federal lands and resources management initiates rulemaking focused on only one natural resource, they are making a repetitive error. This single resource emphasis is not supported by the people in the past that have cared for our lands and resources as well as those of today. Our most accomplished conservationists bring experience melded with technology to the importance of ensuring there is an interdisciplinary dynamic in the stewardship of the dynamic and adaptive management of our lands and resources.

We have made the mistake of leading top down with single resource strategies and directives for in federal agencies for many years. The purpose and need must integrate the natural resources sciences without a single resource driven approach.

That said, we have an opportunity to address the Need to Change the direction all Forest Plans and Resource

Management Plans to integrate the interdisciplinary focus in and achieve the measurable results of this dynamic form of caretaking. We have promulgated numerous top-down management focuses that have caused great concern and on the ground conditions that are not positive. All good things come from working well together and in a trust relationship with government agencies on the ground and in our local communities.

The Forest Planning process requires public input and the shaping of any change to the Forest Plans through transparency and public engagement. It is critical that counties, state, and tribal governments work together to bring their vision and skills together with federal lands managers to revitalize their relationships that can improve the lives people and their local economies.

The strength of our federal land management agencies has been in their local forest and resource plans. It is important that the Inventories of old growth are reviewed first on each Forest and that one size fits all forest types and landscapes is not encouraged.

Many of our FS Forest Plans and the Resource Management Plans need Revision per their respective Code of Federal Regulations. It is our experience that Plan Amendments do not hold the same resilience and support as that of a Plan Revision.

In the Forest Service 2012 Planning Rule 36 CFR 2019 and the Objection process 36 CFR 218.1 allows for so much discretion that can result in the public perception that they are not valued in their participation federal lands management planning and NEPA.

It is imperative that the federal government be transparent in the data sets used, identify sources and whether data analysis is based on desired outcomes instead of seeking the richness of desired conditions or outcomes that are truly beneficial to the lands and resources managed. And please do keep sending us opportunities to comment on content that is substantive.

Forest level Old Growth Inventories have not been shared locally. This would be a great way o start engaging the public and counties to interdisciplinarity revise our Forest Plans. This is where the science applied to expand and change the definition of Old Growth to include mature, or otherwise merchantable trees, can be discussed. It can be analyzed as to the role of harvest, low intensity fires with people that witness the interdisciplinary assessments needed locally.

In the meantime, please encourage the implementation of existing Forest and Resource Plans nationally, while this effort to reincorporate all natural resources into local EIS driven Revisions of Forest Plans takes place.

I have enclosed the National Association of Counties (NACO) permanent policy Resolution Regarding Forest (and RMA) plans to incorporate all resources in Revisions nationwide.

Thank you, I look forward to following and engaging in this process and trust my comments are helpful.

Sincerely,

Attachment: 02.02.24 Old Growth Scoping C.Boyd.docx - is the letter text above.

Attachment: Adopted NACO Policy Resolution on USFS Rulemaking and NEPA for Formalizing County Coordination...- July 2022 copy.pdf - is NACO Policy Resolution on USFS Rulemaking and NEPA for Formalizing

County Coordination and Cooperating Agency Status, Focus on Local Conditions and Public Involvement in Firefighting and Associated Interdisciplinary Resource Management.