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Comments: I have attached the comment letter from the Union County Board of Commissioners as a PDF.

September 18, 2024

Mr. Thomas J. Vilsack

Secretary of Agriculture

United States Department of Agriculture

1400 Independence Ave. SW

Washington, DC 20250

Submitted via Federal eRulemaking Portal

Portal: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

RE: United States Department of Agriculture Forest Service Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement (Federal Register Vol.89 No. 120/Friday, June 21, 2024/Notices/Page 52039)

Dear Secretary Vilsack:

On behalf of the Union County Oregon Board of Commissioners, please accept this letter as comments for the United States Forest Service (USFS) National Old-Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS). Union County's economic viability is highly dependent on federally managed lands for timber production and harvest, energy development, livestock grazing, wildlife, tourism, and recreation and this plan amendment initiated by the Secretary of Agriculture through the Forest Service will have a significant impact on the socioeconomics, custom and culture of our County and State.

Union County serves as a co-regulator and partner of thousands of acres of USFS federal surface that fall within our jurisdictional boundaries. Our County contains varying percentages of federal, state, and private land, which need thoughtful management at each jurisdictional level. Specifically, [not][not][not][not]Union County lands are comprised of approximately 49 % USFS managed lands and are part of the Wallowa Whitman, Umatilla & Malheur National Forests. These resources are important for the livelihoods of residents and the attraction of those traveling through our area. The Wallowa Whitman, Umatilla and Malheur are included as one of the forest units subject to this NOGA planning effort.

Union County has spent the better part of the last six years working with the Wallowa Whitman, Umatilla and Malheur National forests as part of the Blues Intergovernmental Council (BIC) to forge a path to forest plan. The BIC supports the USDA Forest Service's plans to reinstate Forest Plan Revision for the Malheur, Umatilla, and Wallowa-Whitman National Forests. The work completed by the BIC over the past six years has established key foundations that will be crucial components of an improved Forest Plan Revision process by reflecting local values, incorporating input, and providing robust opportunities for meaningful engagement.

On March 14, 2019, the Forest Service Deputy Chief issued instruction to the Forest Service Pacific Northwest Regional Forester to withdraw the Blue Mountains Revised Land Management Plans, Final Environmental Impact Statement and draft Record of Decision. This decision came after nearly 15 years of a highly contentious public planning process in which numerous community members and leaders felt frustrated, misunderstood, and ignored. The objection process yielded over 350 objections to the Forest Plans, which made clear that the public did not see how input provided had been incorporated nor did the plans fully account for the unique social and economic needs of the affected communities. Following the withdrawal of the Blue Mountains Forest Plans, leadership from the Pacific Northwest Regional Office and the Malheur, Umatilla and Wallowa-Whitman National Forests met with the Eastern Oregon Counties Association in April 2019, to coordinate, better understand concerns, and identify opportunities to approach forest planning and management in a new way. The participants recognized the need to explore unique approaches and work together at a larger scale, which included other government entities within and surrounding the Blue Mountains geographic area. The various government entities officially formed the BIC in November 2019, to serve as an overarching entity and develop joint recommendations on the most contentious issues identified in the Blue Mountains Forest Plan Revision process. The BIC members include leaders from all 14 local counties, as well as federal, state, and tribal government entities. The diverse membership of the BIC ensures numerous perspectives and interests are represented. Over the two years since the BIC formed, members worked together to develop desired conditions for Forest Service consideration on several key and previously polarizing issues in the withdrawn Blue Mountains Forest Plans, including riparian livestock grazing, fisheries, hydrology, forest health, and access. The BIC also commissioned and oversaw the completion of a socioeconomic analysis that will offer data to help consider impacts of forest management decisions to local communities.

The NOGA threatens the relationships, trust and cooperative work products of the BIC. Please take into consideration the Desired Conditions developed by large and varied participants, (Attachment 1). The BIC also produced a Socioeconomic Report (Attachment 2). The socioeconomic report shows effects of USFS policies combined with litigation by serial litigants have on local and regional economies.

In addition the adaptive management option of the Eastside Screens should be included as the NOGA moves forward. Follow the science that USFS Staff have provided for direction of Eastside forests. This documentation provided (Attachment 3) advocates for removal of trees over 21 in DBH in very specific circumstances. The health of our forests depends upon a return to historical range of variability.

As partners, Union County works diligently to support the work of our federal land managers to overcome shared challenges and achieve mutual goals. Our County actively participates with USFS district offices and the Region 6 regional office on National Environmental Policy Act (NEPA) projects, trainings and presentations, and special initiatives. Although NOGA is a substantially different planning effort than has ever been contemplated by the USFS, we have committed to participate as a cooperating agency with the USFS and have provided comments, where allowed - but we must do better in our coordination.

Union County Board of Commissioners look forward to continued engagement as the NOGA goes through required steps before implementation.

Sincerely,

R. Matthew Scarfo, Commission Chair

Donna Beverage, Commissioner

Paul Anderes, Commissioner

ATTACHMENT: PDF public comment letter from the Union County Board of Commissioners