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Comments: Date September 20, 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:

Club 20 is a coalition of individuals, businesses, tribes and local governments in Colorado's 22 western counties. These counties are home to the seven national forests within Colorado. Club 20 is organized for the purpose of speaking with a single unified voice on issues of mutual concern. Since the social economics of each of these 22 counties are interdependent on local national forest land management plans within their jurisdiction, Club 20 is concerned about the recent United States Forest Service (USFS) National Old-Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS).

Club 20 does not weigh in on individual forest planning efforts due to a shared belief that these require local input due to the incredible diversity between these landscapes. Club 20 has adopted at least five positions that conflict with the NOGA DEIS findings, and further finds that the DEIS analysis is not compatible with Club 20 direction on public process. Due to historic conflicts experienced in member jurisdictions in prior top-down directives, Club 20 input is to choose a No Action Alternative.

The following principles stating Club 20 values on federal land management are areas where the NOGA DEIS could be in direct conflict with specific adopted positions.

Guiding Principle on Special Designation of Public Lands PLNR 21-2- attachment 1.

"WHEREAS it is critical to maintain and support multiple uses on public lands. The land managing agency should strongly consider the local history, customs, culture, and economy as special designations are analyzed as these are the values that are to be protected under these designations."

The NOGA DEIS was an aggressive effort to fast-track an overlaying new management direction on every existing forest plan in the US. Seven National Forests will be impacted in Colorado by a nationally driven new and often conflicting directive. We do not believe it adequately addresses or protects against myriad local impacts. Based on previous designations and the resulting agency response, there will be additional analysis paralysis and important projects will be even more delayed and perhaps not even started.

Club 20 policies on public processes in public land planning are also in conflict with the NOGA DEIS.

Per "Public Process and Participation in the Development and Implementation of Public Lands Resource Management Plans PLNR - 21- 3. Attachment 2.

"WHEREAS while the management of public lands falls to the USFS and BLM these lands are pivotal economic drivers for the communities in which they are located. The economic interests may differ between counties, even those in the same region. Consideration for the local interests even when they differ politically with federal interests is imperative to maintain public and local government support; and;

WHEREAS local communities have the benefit of unique knowledge and insights of the environment, economy, and management history of the place they call home which many federal and state lawmakers do not have; and WHEREAS many recent legislative efforts have shown little appreciation for the local knowledge and scientific expertise which have made our cooperative management plans sustainable;"

The NOGA DEIS also is unclear on the ultimate effects to existing programs and FS mandates such as the Multiple Use Sustained Yield Act of 1960 and the Federal Land Policy and Management Act of 1976 that are fundamental to the Club 20 commitment and "Guiding Principle of Multiple Use of Public Lands PLNR -18-1". Attachment 3. The DEIS direction is to add an overlay for every forest plan in Colorado. The direction overrides the 2012 Planning Rule directions on changes to existing plans and carries a real risk to the multiple use values important on the Western Slope.

Considering the DEIS old growth threat assessment identifying fire, insect, and disease, Club 20 concurs with the

threats and has adopted PLNR 19-3 Guiding Principles on Forest and Watershed Health - attachment 4, as well as PLNR 21-1 Critical Watersheds, Water Security, and Wildfires". Attachment 5. The DEIS introduces the concepts of new old growth definitions, standards and guidelines that could very well conflict with current federal land management plans and projects that are important in addressing threats to old growth.

As written, the DEIS is unclear about possible changes in future priorities and funding for the federal land management directions. Ironically the NOGA follows an "All Hands call on the Budget" announced this very week. Adding new mandates during a budget crisis may undermine existing management and is poorly timed.

Due to the tremendously broad effects and uncertainty created by the NOGA, and due to the incapability to many Club 20 positions and values, we urge a practical and fiscally sound decision to choose the No Action Alternative.

Thank you for the opportunity to share our concerns.

Sincerely,

Bonnie Brown - Co-Chair Club 20 Public Lands and Natural Resources Policy Committee

Robbie LeValley - Co-Chair Club 20 Public Lands and Natural Resources Policy Committee

ATTACHMENT: PLNR letter on Old Growth DEIS.docx- this is the same content that is coded in text box, it was also included as an attachment