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Organization: Coop - Modoc County

Title: Supervisor

Comments: September 20, 2024

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System  
#65356

As a Modoc County Supervisor, I am writing to express my deep concerns regarding the National Old Growth Amendment and its potential impact on our county, particularly as it relates to the management of Modoc National Forest within our jurisdiction. While we recognize the importance of conserving old-growth forests, the process by which this Amendment has been developed and is being implemented raises significant procedural and substantive concerns. The exclusion of counties from early participation, the lack of meaningful local engagement, and the potential socio-economic impacts on our communities must be addressed before this Amendment can proceed.

At the outset, the process to develop the National Old Growth Amendment excluded counties from participating as cooperating agencies, despite the clear definition under the National Environmental Policy Act (NEPA) that local agencies are essential partners in land-use planning and environmental management. Counties like ours, which have jurisdiction over and responsibilities on adjacent lands were not included until late in the process, despite unique expertise in forest health, wildfire mitigation, and local economies. By that time, critical decisions had already been made, limiting our ability to influence key aspects of the Amendment.

The failure to fully engage counties early in the process not only undermines the principles of cooperative federalism but also weakens the overall effectiveness of the Amendment. Local governments bring valuable insights into the day-to-day management of forests and the impacts federal decisions have on the surrounding communities. However, counties have had minimal opportunities to contribute this expertise. The rushed invitation to join as cooperating agencies, with little room for modification or tailored agreements, has left us without the capacity to meaningfully participate in shaping this critical policy.

Moreover, the one-size-fits-all nature of the Amendment does not account for the wide diversity of ecological, economic, and social conditions across different regions. In Modoc County, we are home to Modoc National Forest, where forest management is crucial to balancing conservation with responsible resource use. The Amendment's restrictive approach could significantly curtail activities, jeopardizing jobs, economic stability and safety in our community.

The Amendment introduces a national framework for managing old-growth forests, but it fails to consider the distinct forest types and local management needs within regions like ours. Applying uniform policies across diverse landscapes may hinder rather than help the health of old and mature-growth forests. For example, in some areas, proactive management strategies like thinning and prescribed burns are critical to reducing the risk of catastrophic wildfires, particularly in the Wildland-Urban Interface (WUI), where forests meet human development. The current framework risks creating more procedural hurdles for these necessary treatments, delaying or preventing vital actions that protect both the forest and surrounding communities.

Additionally, the U.S. Forest Service in a report titled "Mature and Old-Growth Forests: Analysis of Threats" found that wildfires pose the greatest threat to old and mature-growth forests. The inadvertent creation of additional procedural requirements before forest management activities can take place, or the exposure to lawsuits which delay necessary work, could slow critical treatments to a crawl, exasperating the threat of wildfires to old and mature-growth forests. Careful implementation and planning of the amendment through locally-led, cooperative

practices, helps to ensure that procedural requirements are streamlined and tailored to local agencies often responsible for carrying out these vital treatments.

In our county, we are already seeing the devastating impacts of wildfires exacerbated by the dense, unhealthy conditions of our forests. The Amendment's focus on long-term conservation without adequate flexibility for active forest management could unintentionally contribute to this growing wildfire crisis. Many areas need proactive intervention—thinning, prescribed burns, and vegetation management—to restore forest health, reduce fuel loads, and improve resilience to wildfire, drought, and pests. Without these tools, our forests face increased vulnerability to the very threats the Amendment seeks to address.

It is crucial that the Amendment not only protect old-growth forests but also maintain consistency with county and regional management plans. The failure to coordinate federal plans with local governments risks creating a disconnect between federal goals and the practical realities on the ground. In Modoc County, we have developed comprehensive resource management plans that include detailed strategies for managing forest health, water resources, economic development, and fire prevention. These plans reflect the unique conditions of our area and are tailored to the needs of our communities. Unfortunately, the current process for the Amendment has not meaningfully incorporated these local plans or the local knowledge related to forest management.

Local governments, including counties like ours, have long-standing knowledge of the lands we manage and can provide critical input on how to achieve conservation goals while supporting sustainable economic development and forest health.

Moreover, the Amendment's provisions seem to disproportionately emphasize conservation over active management. While preserving old-growth forests is an important goal, it should not come at the expense of proactive management that reduces fire risks, damage caused by insects and disease and improves forest resilience. This balance is especially important given that many of our mature forests are already facing threats from climate change, invasive species, and years of fire suppression that have led to overgrown, unhealthy conditions. Allowing old-growth forests to be managed as static, unchanging ecosystems is not a sustainable approach in the face of these challenges. Instead, the focus should be on creating adaptive, resilient forests that can withstand the pressures of changing environmental conditions.

Considering these concerns, we respectfully request that the National Old Growth Amendment process be paused or restarted to allow for full and meaningful participation from counties like ours. By slowing down the process, the U.S. Forest Service can ensure that local governments are fully engaged as cooperating agencies, providing the expertise and insights necessary to make the Amendment more practical, effective, and regionally appropriate.

We believe that counties are not just stakeholders but essential partners in managing public lands. With proper involvement, counties can help shape policies that balance ecological preservation with the needs of local communities. We urge you to restart this process and create a more inclusive framework that recognizes the value of local governments in crafting policies that benefit both our forests and the people who rely on them.

Thank you for considering our concerns. We look forward to working with you and the U.S. Department of Agriculture to ensure that this important policy is developed in a transparent, collaborative, and effective manner.

Sincerely,

Ned Coe

Supervisor

Modoc County, California

ATTACHMENT: Old Growth.doc - this is the same content that is coded in text box; it was also included as an attachment