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Organization: Modoc County Farm Bureau

Title: President

Comments: Dear Director:

The Modoc County Farm Bureau (MCFB) submits the following in response to the Federal Register Notice No. 243 gg042-ggo4g regarding Land Management Direction for old Growth Forest conditions Across the National Forest System.

MCFB is a non-governmental, non-profit, voluntary membership organization whose purpose is to protect and promote agricultural interests in Modoc County and to find solutions to the problems of the farm, the farm home and the rural communities through the responsible stewardship of natural resources. Our members depend on National Forest lands for their livelihoods, their recreation and their firewood. We have grave concerns over any proposal, such as this one, that could limit these activities without our opportunity to have our issues addressed at the local level.

We believe that the Forest Service's proposal to amend all 128 Land Management Plans (LMP's) through one Environmental Impact Statement (EIS) to be seriously flawed and should be withdrawn. Modoc County and the Modoc National Forest have been part of two top-down, one-size-fits-all efforts to amend many plans at one time; the Northwest Forest Plan and the Sierra Nevada Plan Amendment' Both attempted to amend multiple plans with one EIS and both failed to account for local differences between forests. More importantly, both efforts failed to accomplish their Purpose and Need and both left the local ecology and the local economies worse off than they were before. Your new proposal is similar, except on steroids.

To the Forest Service's credit, at least in these two previous exercises, the agency took the proper steps in involve the local governments and communities in the planning process as required by statutes, Enough time was taken that everyone had an opportunity to understand the process and the potential impacts from the decisions. This process took several years. Your new proposal is ten times as big, the local differences are far starker, yet your process appears to be an attempt to cram through a proposal in less than a year. One finds it hard to believe that this isn't driven primarily by politics, rather than the best science as you claim!

Your own data demonstrates that the overwhelming threats to old growth (as well as all stages of growth) are wildfire, disease and insects. Yet your proposal only increases these threats. All stages of forest require active management to stay healthy. Your proposal smacks of preservation, rather than the conservation of old growth. The Forest Service needs to provide valid scientific evidence from recognized forest managers that mature and old growth forests are better managed by a "hands off" approach that increases their dangerous conditions, rather than being actively managed.

In Northern California, we are hard pressed to find any old growth that is not significantly overstocked' Those that are not now overstocked have already burned, It is high time the Forest service accepted the premise that active management is the best tool for healthy forest ecosystems as well as sustainable stands of old growth. Old growth must be protected from wildfire, disease and insects, if it is to provide proper habitat for those species that depend on it.

This appears to be an effort to limit proper management of National Forests under the cloak of climate change. Certainly there is ample evidence, at least in California, that actively managed forests at all stages of growth sequester more carbon than overstocked stands. Old growth no longer is the sink for carbon that it was while it was actively growing. Climate change is not the reason that our National Forests are in the deplorable shape that they are in today, it is because the Forest Service has chosen not to manage for climate change. This

management centers around reduced stocking rates to address reduced moisture and reduce risk from wildfire, disease and insects.

Old growth forests, by your definition, have begun to decline and decay as active growth has ceased. Consequently, they are more prone to insect and disease infestations and more vulnerable to significant climate events. In the West, they are, more than likely, severely overstocked and prime for stand replacing catastrophic wildfire. By placing even more restrictions (and there are substantial restrictions already) on mature forests, you are making these unacceptable conditions even worse and guaranteeing that they will burn.

It is ironic that after years of lackadaisical management, the agency has finally recognized the urgent need to ramp up the pace and scale of forest treatment in order to try and get a handle on the ever increasing numbers of catastrophic wildfire. Now you are proposing to amend all LMP's to make it even harder to put active management on the landscape to accomplish a multitude of missions, one of which would be to sustain and increase old growth.

We fail to see any latitude within the current proposal to adjust for local conditions' It is not possible to achieve this finite a proposal and accommodate the differences on national forests from Florida to Alaska. Any proposal to achieve old growth maintenance and enhancement need to be in guidance form and let each local LMP adjust for local climate, species mix and other factors. Many parts of the country have struggled for years with uniform national forest policy that is always developed for just one portion of the nation. Old growth forests vary significantly from region to region. Attempting to define and quantify them in a one-size-fits-all plan amendment is both unnecessary and an insurmountable task. This is best left to individual regions and local forests/communities.

Our members expect that their interests will be considered when they are represented by local government and special districts through the National Environmental Policy Act's (NEPA) requirement for Cooperating Agency status. We are unaware of any effort to invite eligible entities to participate in this planning effort as cooperating agencies. We suggest this exercise be halted until such time as invitations have been issued to those local government entities that will be affected by this propose policy, We know Modoc County and many of our special districts could be severely impacted.

Our members have often participated as "subject matter" experts during coordination between the Forest Service and Modoc County. We recognize this is a requirement of the National Forest Management Act (NFMA) to coordinate with local government during the revision or amending of LMP's. This is a vital part of Forest Service planning as it ensures that local government has an opportunity to shape the activities on their local forests that can significantly impact both the local ecology and economy. It appears this requirement has been overlooked in this proposal, which would be a violation of NFMA. Again, we would urge a cessation in this process until you have complied with the required coordination. We know that Modoc County has years of experience in coordination at both the localforest and regional level and would expect coordination on this proposal.

We believe that there should be an adequate range of alternatives displayed and analyzed in the EIS as required by NEPA. This should include an "active management" alternative for mature and old growth protection. We expect a deep dive into the increased risks of catastrophic wildfire and the negative impacts of greenhouse gas emissions when compared to the above alternative. We also believe in the need of a robust and accurate socio-economic analysis, particularly focused on the impacts to local communities (The Northwest Forest Plan failed completely in predicting the devastation of many small towns).

In conclusion, MCFB believes this plan amendment is not well thought out' It proposes to "protect" mature and old growth forests by taking a "hands off" approach which will make the overstocking, insect, disease and wildfire prone issues that infect nearly all the forests in the West even worse. It fails to engage local governments through the requirements in NEPA and NFMA.

Once these major flaws are addressed, we suggest an approach that leaves decisions regarding species specific old growth definitions, determinations as to what is and isn't old growth and how to manage it to local forest plans. Perhaps setting national policy on guidance on conservation (as opposed to the current preservation) of mature and old growth forests that will allow for vegetation management, which is particularly needed in western dry forest types.

Attachment: MCFB Old Growth Comments.pdf is letter content above.