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First name:
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Organization: Jackson County Board of Commissioners
Title:
Comments: On behalf of the Jackson County Board of Commissioners, please accept for public comment the attached letter regarding the draft Environmental Impact Statement No. 20240110, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

September 12, 2024United States Department of Agriculture, Forest Service1220 SW 3rd AvenuePortland OR 97204-2825RE: Draft Environmental Impact Statement No. 20240110, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest SystemDear United States Department of Agriculture, Forest Service:We, the Jackson County Board of Commissioners, thank you for the opportunity to comment on the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.As an initial matter, the scale at which this Amendment is being applied is too broad. A one-size-fits-all management plan for all forests across the United States National Forest System discounts the local social and environmental impacts of its application. As County Commissioners in Oregon, we have many concerns specific to the National Forests in Southern Oregon, but especially the constant threat of wildfire. This nationwide Amendment does not allow these regions or forest specific-concerns to be addressed.Secondly, the findings in the Analysis of Threats on Lands Managed by the United States Department of Agriculture, Forest Service (USFS), and Bureau of Land Management, FS-121 Sc, June 2024, do not support the need for changing the current Management Plan. The Threat Assessment confirmed that the highest loss of old-growth forest over the last twenty years is from wildfire, insects, and disease. The Assessment also confirmed that old-growth forest loss was higher in areas reserved for timber harvest but old-growth forest increased by 7.8 percent in areas where timber harvest was allowed and encouraged. We would ask the USFS to focus their efforts on promoting active forest management in order to sustain existing old-growth forests from the real threats it is facing: wildfire, insects, and disease. This unnecessary Amendment is likely to serve as a distraction from the USFS's most pressing need, the acceleration of active forest management to address the wildfire crisis. The Amendment adds layers of bureaucracy and red tape, instead of allowing local public land managers to actively address the crisis that is the threat of wildfire in the Pacific Northwest. By allowing local public land managers the ability to manage local forests, they can implement policies from the Wildfire Crisis Plan that align with our local Rogue Valley Integrated Community Wildfire Protection Plan.While we do recognize, and are in strong support, that the USFS is not proposing an outright prohibition on commercial timber harvest within old-growth forests, we believe that commercial timber harvest should remain a viable and utilized option within our National Forests. Thus, we are concerned that the Proposed Action in this Draft Environmental Impact Statement (DEIS) will for all practical purposes discourage commercial timber harvest. The current DEIS incorrectly states that the Amendment would have no effect on timber supply from the National Forest Service, and as such no effect on the forest products and logging industries. However, due to the constraints and regulations imposed on the forest service, the implementation of this Amendment will hinder the ability to manage in or around old-growth forests, which will affect the ability to harvest timber. The proposed Adaptive Management Strategy in this DEIS willlikely significantly alter the timber supply and have an adverse impact on the forest products sector. This strategy constrains local decision-making by setting unnecessary standards and guidelines. The Forest Service should be focused on removing barriers and constraints to forest management, not adding new ones. Our national forests need local and active management, not red tape and national control.Finally, we are concerned that the initiation of this Amendment in December 2023, prior to the publication of the Threat Assessment as directed in Executive Order No. 14072, was a flawed process. We believe this process is being rushed in an attempt to hamper the ability of the public to properly provide comments at all stages in the process, but most importantly in the early stages of the Amendment development, when the comments could be properly considered and addressed. Not only was this Amendment initiated prior to the publication of the Threat Assessment, it also does not include the Wildfire Crisis Implementation Plan or regional plans including the Rogue Valley Integrated Community Wildfire Protection Plan.

This shortsighted action makes this Amendment a poor attempt to manage old-growth forests. This Amendment should not proceed to a final action and instead should be re-done in order to include all parts and properly allow for public comment.In summary, the current Amendment does not address the most severe threat to our forest, wildfire. Living in Oregon, wildfires are a constant threat to both our citizens health and the communities we live in. The USFS needs policies that take an active approach to forest management. Extra bureaucracy will not save our forests. It already takes years for the USFS to implement forest health treatments and this Amendment adds regulations and red tape by applying a one-size-fits-all land management plan for all national forests across the County. Instead the USFS should be empowering public land managers and providing tools to individual national forests to focus on addressing the wildfire crisis through local plans, including the Rogue Valley Integrated Community Wildfire Protection Plan, to achieve desired conditions relevant to local regions.Sincerely,ATTACHMENT: 2024_09_12_ Comments_USDAForestService_LMP_Signed.pdf - this is the same content that is coded in text box; it was originally only included as an attachment