



COUNTY OF SISKIYOU

Board of Supervisors

1312 Fairlane, Suite 1
Yreka, California 96097
www.co.siskiyou.ca.us

(530) 842-8005
FAX (530) 842-8013
Toll Free: 1-888-854-2000, ext. 8005

September 20, 2024

Director, Ecosystem Management Coordination
201 14th Street, SW, Mailstop 1108
Washington, DC 20250-1124

Subject: Amendments to Land Management Plans to Address Old-growth Forests Across the National Forest System, Draft Environmental Impact Statement.

To Whom it May Concern:

Siskiyou County is writing to provide our comments on the Amendments to Land Management Plans to Address Old-growth Forests Across the National Forest System, Draft Environmental Impact Statement. Siskiyou County has a vested interest in the health of our national forests and the regulations and policies that guide the management of these lands. Approximately 62% of Siskiyou County lands are held under federal ownership and are managed by the United States Forest Service. The County has engaged in countless opportunities to comment on new policies and regulations that will impact our County. Many of our comment letters address the need for active forest management, while also outlining that restrictive management plans and regulations prevent common sense management from occurring.

Forest Service data consistently finds that the nation has abundant old-growth forests and that the proportion of forests aged 100 years and older is projected to increase, with relatively large increases in the 150-plus year age class under the current management paradigm, without the proposed amendment (Council, 2024). The Forest Service has consistently found that wildfire, insects, and diseases pose the most significant threats to older forests. In June of this year, the Forest Service released a report, "Mature and Old-Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management" which stated that since 2000, wildfires, insects, and diseases have contributed to a net decrease of over 850,000 acres of old-growth forests. Conversely, tree-cutting has led to a net decrease of only 9,000 acres during the same time period. .

Given the Forest Service's June report, we must point out that the proposed amendments do not address the real threats to old-growth which include fire, insects and disease. In these amendments, the Forest Service, rather, proposes many plan components that will have a major impact on the future management of federal forests. Although the Forest Service claims that these components will result in consistency across national forest lands, we are concerned that these amendments will not only not supersede existing old-growth plans but will result in a complex web of analysis and planning efforts. Scientifically, there is no consistency between old-growth conditions on a large scale as being declared in the proposed amendments. Forest ecologies are geography-unique and are dictated by

Brandon Criss
District 1

Ed Valenzuela
District 2

Michael Kobseff
District 3

Nancy Ogren
District 4

Ray Haupt
District 5

aspect, elevation, climates, tree genetics, soil types and disturbance regimes, not by oversimplified written policy. The proposed amendments are oversimplified and antiquated, which will undoubtedly result in reduced active management, thereby predisposing forests to increased negative disturbances.

With the release of these amendments, the Forest Service is again proposing burdensome regulations that will impede forest management activities, will make forests less healthy, and make them less resilient to wildfire. In addition, the Forest Service is proposing these amendments while at the same time failing to define an old-growth forest, meaning that these amendments, if approved, would be implemented in an ambiguous and sweeping manner across forest landscapes. These amendments are an unprecedented action to amend 128 existing federal forest plans, disguised as claims to conserve and protect old-growth. In reality, we need to remove burdens to forest management and allow silvicultural prescriptions that are scaled to address the unique ecology at the local level. Siskiyou County is home to four unique forests, the Klamath, Modoc, Six Rivers, and Shasta-Trinity, and each of these forests requires just as unique forest planning efforts.

These amendments fail to meet regulatory requirements that must be met when amending forest plans, while at the same time necessitating adaptive management plans that do not include public input. This effort to amend 128 forest plans through a singular process disputes the 2012 Planning Rule, which requires extensive public involvement at local and regional levels. The timeline for this amendment, which is far too short to ascertain meaningful public input, makes it nearly impossible to fully analyze the social, ecological, and economic impacts that the components will have at the forest level. This is extremely concerning for our rural county whose majority of land is held by the Forest Service, whose communities are extremely vulnerable to wildfire, and where private forest land is checkerboarded with federal lands.

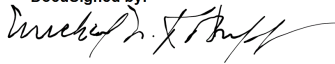
Similar to the recommendations made by the American Forest Resource Council (AFRC), the Forest Service should direct individual national forests to address old-growth forest management in future planning efforts across the National Forest system. This approach would allow each forest to identify and analyze the effects of the proposed direction on their individual forests and ensure that the Forest Service is adequately protecting old-growth. As AFRC President, Travis Joseph stated, "For most Americans, the amendment misses the point. Our national forests are unhealthy. Our communities and rural infrastructure are at-risk. Millions are choking on wildfire smoke, including our most vulnerable populations. We're losing access to our most iconic and incredible natural places. And what's the Biden Administration's response? To simultaneously amend 128 national forest plans in the middle of a dangerous wildfire season that will distract the agency from its mission and make any proactive work in forests more difficult and expensive."

In summary, we urge the Forest Service to select Alternative 1 of the Draft EIS, the no-action alternative. Our coordination with other entities and agencies indicates, however, that this decision is unfortunately, unlikely. If this is the case, the Forest Service must, as AFRC details in their letter, "consider the immediate impacts to project currently in the NEPA planning process. It would be prudent for the Forest Service to include language in the final decision that allows those projects to proceed unaffected by the impending Amendment. A widespread "reset" of hundreds of projects, most of which are designed to reduce the risk of high severity wildfire, would be disastrous to our

membership, the Forest Service's other partners, and the health of the NFS {National Forest System}" (AFRC, 2024).

If you have any questions or want to discuss this further, please contact, Elizabeth Nielsen, Deputy County Administrator at enielsen@co.siskiyou.ca.us or (530) 842-8012.

Sincerely,

DocuSigned by:

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Michael Kobseff

Chair, Board of Supervisors

cc: Congressman Doug LaMalfa
Acting Supervisor Ian Reid, Modoc National Forest
Supervisor Chris Christofferson, Klamath National Forest
Supervisor Rachel Birkey, Shasta-Trinity National Forest

Works Cited

Council, A. F. (2024). *Amendments to Land Management Plans to Address Old-growth Forests Across the National Forest System, Draft Environmental Impact Statement*. Portland: AFRC.

Council, A. F. (2024, June 20). *Politically Driven Nationwide Old Growth Amendment Fails to Address Primary Threat to Old Forests, Harms Efforts to Address Wildfire Crisis*. Retrieved from AFRC: <https://amforest.org/politically-driven-nationwide-old-growth-amendment-fails-to-address-primary-threats-to-old-forests-harms-efforts-to-address-wildfire-crisis/>