



Mendocino County Farm Bureau

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Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

February 11, 2020

United States House of Representatives
Washington, DC 20515

RE: HR 2250 (Huffman) - Northwest California Wilderness, Recreation, and Working Forests Act

Dear Members,

The Mendocino County Farm Bureau (MCFB) is a non-governmental, non-profit, voluntary membership, advocacy group whose purpose is to protect and promote agricultural interests throughout the county and to find solutions to the problems facing agricultural businesses and the rural community. MCFB would like to submit our concerns regarding HR 2250 (Huffman): Northwest California Wilderness, Recreation and Working Forests Act.

MCFB has been engaged with the Congressman on past versions of this legislation since first introduced in 2017 and attended the public meeting on this proposal in Ukiah in August 2017 to submit oral comments. Since 2017, there has been limited to no additional public outreach related to this legislation to further discuss local concerns with the language.

Below is a list of concerns that MCFB has with HR 2250 and we encourage consideration of these comments.

1. All the mandates for the creation and prioritization of the proposed projects by USFS and BLM don't clearly define where the additional funding for these agencies will come from. Management budgets for public lands are already limited without adding unfunded mandates.
2. Additional road decommissioning and reduced road maintenance on public lands will deter honest people (could encourage dishonest uses such as trespass cannabis cultivation or wildlife poaching) from accessing and enjoying public lands. Lack of maintained road systems will also inhibit future fire operations and forestry management.
3. Grandfathered public lands grazing permits are allowed, but there could be additional restrictions included in future permit terms. New public lands grazing permits within the lands designated as restoration areas would be limited and not allowed within new wilderness area or conservation area designations. Public lands grazing permits support local ranchers and economies as well as provide fire prevention benefits by reducing fuel load. Public lands grazing is already burdened by the existing process and NEPA review requirements. Permits should not be subject to additional limitations or restrictions through the proposed public land special designations included in this legislation.
4. The USFS has existing policies to reduce fire fuel load that also support local economies through sustainable timber harvests and other vegetation management projects. Instead of creating additional special designation areas that further restrict forest management, the USFS should be given more flexibility and resources to expedite forest management projects that can assist in reducing fire hazards and support rural economies.
5. The expansion of the Wild and Scenic river designations and the development of related management plans could impact private properties that adjoin the rivers. Also, the cost of completing the management plans for existing Wild and Scenic designations is already prohibitive to the USFS. Adding additional designations without significant funding resources will only compound this issue. In addition, if plans aren't completed then the USFS could be subjected to costly litigation if there are challenges brought for not having plans in place.

6. Current restrictions/limitations on fire prevention and suppression capabilities on public lands under special designation should be further discussed. The public lands within this proposed legislation adjoin communities and private properties. Public lands also contain watersheds that provide water supply for multiple beneficial uses. Any provisions that restrict the use of fire prevention and suppression tools in lands under special designation need to be further addressed to better protect natural resources, water supply, adjoining communities and private property from wildfires on public lands.
7. Stewardship contracts with NGOs may not agree with the working landscape model of the USFS and could impact forestry, grazing and other current allowable practices on USFS lands covered by this proposed legislation.
8. Multi party monitoring could also complicate projects and create conflict between the current relationship of the USFS and permit holders.
9. Partnerships for cannabis cultivation site cleanup on very remote public lands sounds positive, but without significant funding, it won't happen. Grants aren't consistent and adequate amounts of the funds may not go to actual cleanup.
10. There is a checkerboard of private property holdings within the public lands included in this legislation and within some of the proposed wilderness area designations. It is unclear how access to, and management of, private properties within the proposed wilderness or other designations may be impacted. There should also be additional definition of the consent process for proposed trail segments that may be located on private properties and what happens if private properties are sold and consent is no longer granted.
11. Acquisition authority is concerning for private lands within conservation management areas. This action is supposed to be for willing sellers, but it is hard to tell what the actual process would look like.

A significant portion of Mendocino County and other adjoining counties are in public land holdings. With the recent wildfires in 2017-2019 there is a heightened interest to improve upon the management of public lands. In addition, rural communities can benefit from working with the USFS and BLM on projects that create jobs or support local industries such as ranching or forestry. The language within HR 2250 and the proposed conversion of additional public lands to a more restrictive conservation use base is not the answer.

Since it is unclear as to how the concerns above will be addressed, MCFB does not support HR 2250. If there are any questions regarding this letter, please feel free to contact the MCFB office.

Sincerely,

A handwritten signature in black ink that reads "George Hollister". The signature is written in a cursive, flowing style.

George Hollister
President

CC: Mendocino County Board of Supervisors
Congressman Huffman, c/o Ukiah district office