Jamie Barbour, Assistant Director
Ecosystem Management Coordination
USDA Forest Service
Washington, D.C.

RE: Request for Information (RFI) on Federal Old-Growth and Mature Forests,
87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185

Dear Mr. Barbour:

We are very concerned in the State of Montana what this well intended but misguided Executive Order 14072 would mean for forest management, forest restoration, fire management, fuel hazard reduction and the communities that depend on our forest resources. This executive order is not being generated by Forest Managers, Fire Managers, Communities, States or anyone else that has a background in the management or maintenance of our public lands. It is possible that EO 14072 could be used to curtail meaningful forest management. Currently, our public land managers have almost no ability to implement critical projects without going to court and being subject to consultation, litigation and other repetitive and time consuming distractions. Yet our forests (including old growth and mature) keep burning, our infrastructure and ability to do good work further dwindles, and lawyers and judges continue to manage them from afar.

Old growth is one stage in dynamic forest ecosystems. Without active management it is futile to try to hold a forest in an old growth state any more than it would be possible to hold on to any other stage of forest growth. Additionally, an extensive inventory already exists of ALL National Forest System lands. We know the average age of any given stand, we know how much our forests are growing and dying each year, we know species composition and all other metrics by which we measure forests. Instead of spending time and resources on an impossible and unachievable task, policies should focus on efforts that will create more resilient forests that will save old growth and allow mature forests to remain on the landscape and become old-growth. This could be done in planning documents that are already or will be written during current processes or better yet while implementing the 10 year wildfire strategy. If we spend additional time and money to define and inventory old growth and mature forests, who will utilize that information? The public land managers whose decisions end up in court? Do the Forest Plans for each National Forest not already provide guidance concerning old growth? We are staring at another well intended but horribly counter-productive Roadless type rule that will further constrict the ability of our public land managers to implement projects at a meaningful scale. (https://www.youtube.com/watch?v=XOnPQo97juM This is a video about the Basin Creek Watershed. The municipal watershed of Butte, Montana is in significant

peril and efforts to restore the watershed are severely hindered with a Roadless designation. We feel this old growth order will have similar impacts.)

We believe the definition and inventory already exists at the local level. We also believe that our public land managers struggle to implement sound forestry due to litigation and consultation. This Executive Order 14072 will create an even more difficult environment to make good decisions. We would suggest that our line officers be allowed to make decisions consistent with the Forest Plan for each National Forest and not hindered by yet another cumbersome rule.

I would suggest that a visit from you and your staff on the Beaverhead-Deerlodge National Forest would showcase what current policy and management strategies are equating to on the ground. I will buy you lunch, give you a tour of what used to be beautiful National Forest and give you a tour of our facility.

Thank you for the opportunity to comment.

Respectfully yours,

Sherman Anderson, Owner
Nick Jose, Resource Manager
Dave Krueger, Procurement Forester
Craig Blubaugh, Procurement Forester
Sean Steinebach, Outreach Forester
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