



August 29, 2022

Mr. Jamie Barbour, Assistant Director
Ecosystem Management Coordination
USDA Forest Service Washington, D.C. 20250

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:

On behalf of the Montana Logging Association (MLA) and its members, thank you for the opportunity to comment on the Request for Information (RFI) captioned above. MLA is Trade Association that represents 450 family owned/operated businesses in the harvesting/transporting of wood products in Montana. A number of our member's partner with the U.S. Forest Service and Bureau of Land Management using their expertise, employees and equipment to achieve forest management goals.

We strongly support the Biden Administration's ambitious goals of dramatically increasing the pace and scale of science-based, active forest management to reduce the risk of catastrophic wildfires, to protect at-risk communities and vulnerable populations, and improve the health and resiliency of our federal forests. Although we appreciate the Biden Administration's sensitivity to and focus on old-growth and mature forests, the greatest threat to our federal forests and public safety are catastrophic wildfires and toxic smoke. More than 80 million acres of federal forests are at-risk and need action-based solutions.

Recommendations

1. Avoid "universal" definitions of old-growth

The agencies should avoid the impossible and unscientific task to come up with a top-down, single, "universal" definition of old-growth that would apply to many diverse forests and forest types across the United States. Just in the great state of Montana, our forests are dramatically diverse. Any single definition of old-growth and mature forests could be so general that it's useless in guiding forest management across the nation, or so specific that it leaves out forests that some would consider mature. In no case, should the agencies adopt a definition based on arbitrary size, age, or diameter limits.

Instead, the agencies should continue to rely on local and regional planning processes that require every national forest management plan to “provide for key characteristics associated with terrestrial and aquatic ecosystem types,” including old-growth. This would ensure any old-growth definition is tailored to the specific geographic location and region, ecosystem, and forest type.

2. Accelerate active forest management

The USFS and BLM should focus on accelerating active forest management on federal lands to reduce the risks of severe wildfires and to improve our forests’ resiliency to fire, insects and disease, and to adapt these landscapes to the impacts of climate change. At a time when we need more management on fire-prone federal lands, this is a formula for more bureaucracy and red tape that further ties the hands of our public lands managers. The worst thing we could do during a climate crisis is to walk away from our public lands and decide not to use the tools available to help adapt these lands to changing conditions and reduce the risk of catastrophic wildfire.

Conclusion

Thank you for this opportunity to comment on the RFI. We reiterate our commitment to working with the Forest Service and BLM to help address our nation’s wildfire and forest health crisis. Our members play an invaluable role in climate change mitigation through science-based, active forest management. We strongly encourage the Administration and federal land management agencies to prioritize and focus on action-based solutions to restore forest health, reduce the risk of catastrophic wildfires, and protection communities and public health.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McEntire".

Tim McEntire
Northwest Region Representative
Montana Logging Association
406-752-3168