

Boise Cascade Wood Products, LLC
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January 17, 2024

RE: National Old Growth Proposal and Northwest Forest Plan Amendment Comments

To whom it may concern:

Boise Cascade Wood Products, LLC (BCC) is a company with a rich history in Oregon. Locally, the company's focus is engineered wood products (I-Joists, Laminated Veneer Lumber, and Parallel Laminated Veneer), plywood, and mass timber products. BCC has production facilities throughout the United States. In addition to the forest products business, BCC has an extensive materials distribution business that is active throughout most of the United States. BCC has had a presence in Oregon since 1960's, and currently directly employs ~900 people Oregon and 6,000 associates nationwide. In Oregon (Willamina, OR, White City, OR, and Elgin, OR), BCC utilizes ~200 MMBF of logs annually for production of engineered wood products and plywood products. In addition, BCC indirectly contracts with local logging companies, excavation companies, site prep and reforestation contractors, equipment manufacturers, mechanics, fabricators, and many more, which drastically magnifies our economic footprint in the community.

BCC is committed to achieving the goals of the Sustainable Forestry Initiative (SFI), the Forest Stewardship Council (FSC), and the Program for Endorsement of Forest Certification (PEFC) by implementing the rigorous requirements of those credible certification standards. As we continually strive to maintain the principles of sustainable forestry, we require compliance with Best Management Practices (BMP's), all applicable federal, state, and local laws and regulations.

It is BCC's position (along with many others) that sustainable, active forest management, along with the storage of carbon in green infrastructure (wood products) is part of the solution on the topic of climate change. Trees plus wood products equals mitigation at scale.

BCC cannot support an amendment to the land management plans of every National Forest in the country that will create new standards and guidelines regarding the management and recruitment of old growth forests across the country. This policy is a negative to the environmental, economic, and social aspects of our communities.

The United States Forest Service (USFS) is already managing for recruitment of Older Forest Structure; creating another layer of bureaucracy (amending 128 Forest Plans) would only stress an already depleted workforce and take away from the two present-day mandates guiding current planning. Over 50 percent of National Forest System (NFS) lands are already off limits to commercial timber harvest. Further limiting the USFS's ability to care for the lands in an effective and sustainable manner directly contradicts their guidance to increase the pace and scale of hazardous forest fire fuel reduction. It is also contradictory to the implementation of climate smart forestry as it is shown that the NFS has become a net emitter of carbon due to poor forest health

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(overstocking leading to insect and disease, poor vitality and resistance to wind and weather events, and susceptibility to catastrophic stand replacing wildfire).

BCC is not arguing for the harvest of "old growth" timber. BCC is against the drafting of additional restrictions that directly inhibit the ability of the USFS to implement plans to improve forest health and resiliency. BCC is in the business of creating sustainable, affordable, green building materials, vital to the production of shelter in the midst of a national housing shortage. Further restriction of available timber supply (in the United States where we have the most stringent environmental laws in the world) would exacerbate the ability to provide affordable housing.

Creation of another level of bureaucracy in this manner harms communities, disproportionately impacts rural areas lacking in availability of family wage jobs and puts communities at risk due to increased chance for catastrophic wildfire.

If the proposed change were to be enacted, local manufacturers dependent on the timber, returns to the Governments, and the resource (ability to sustainably manage on a reasonable timeline) would all suffer.

Thank you for taking the time to consider our concerns. Please feel free to contact me for and follow up you might need.

Respectfully,

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