



Associated Oregon Loggers, Inc. • P.O. Box 12339, Salem, OR 97309
503/364-1330 • www.oregonloggers.org • email: aol@oregonloggers.org
"A Trusted Partner for Oregon's Forest Operators"

September 19, 2024

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124
Website: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

RE: Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System (NOGA) -- Draft Environmental Impact Statement (DEIS)

Dear Director, Ecosystem Management Coordination:

On behalf of the member companies represented by Associated Oregon Loggers, Inc. (AOL), we submit the following comments on the proposed Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System (NOGA) -- Draft Environmental Impact Statement (DEIS).

- **We strongly oppose the Preferred Alternative 2, and urge the Forest Service to redirect to implement the DEIS "No Action" Alternative 1.**

I am writing on behalf of Associated Oregon Loggers, Inc. (AOL), a trade association which represents more than 1,000 logging and allied forest management member companies statewide. These companies play a major role in management of private and public forests throughout Oregon— as forestry contractors, purchasers, transporters, harvesters, road constructors, thinners, reforesters, firefighters, restorers, and vendors of forest management services. AOL member companies commonly sub-contract or purchase Forest Service forestry, restoration, improvement, protection, and roading contracts. As such, AOL represents substantial expertise in management of Oregon's eleven national forests—comprising 14.1 million acres or 48% of Oregon forestland statewide.

AOL is a member partner of both the American Forest Resource Council (AFRC), and the Federal Forest Resource Coalition (FFRC). Both these organizations have submitted detailed formal written comments concerning the NOGA DEIS. As such, we concur with those two separate formal comment letters, and we support their more detailed remarks and recommendations.

- **We support comments submitted on the NOGA DEIS by American Forest Resource Council, and the Federal Forest Resource Coalition.**

We support the no action alternative described in the NOGA. The Preferred Alternative 2, as drafted, violates the National Forest Management Act and the 2012 Planning Rule. Additionally, the DEIS fails to take the "hard look" at consequences of the preferred alternative required by the National Environmental Policy Act. The analysis of the economic impacts of the proposal are inadequate. Adopting the preferred alternative would plunge the Forest Service into chaos and less project accomplishment, while the agency is already over-burdened by grappling with significant wildfire, budget, and administrative challenges.

We have the following objections to the NOGA DEIA proposal:

1. The agency has not demonstrated a need for change
2. Violations of NFMA and the Planning Rule
3. Alternative evaluations are misleading and inaccurate
4. Several components of the proposal are unnecessarily inefficient, costly, destructive, and/or inaccurate, including:
 - Distinctive Roles and Contributions; Goals; Management Approaches; Desired Conditions; Objectives; Standards; Guidelines; Plan Monitoring; “resilience” misapplication; and The wrong-headed conclusion that “no effects are expected on traditional timber industry jobs in logging, wood product manufacturing, and pulp production” is completely unfounded and errant.

NOGA DEIS Alternative 2 would obstruct sustainability and harm infrastructure. As proposed, Alternative 2 is counter-productive. Alternative 2 would harmfully-increase bureaucratic red tape, which would hinder critical forest management efforts needed to mitigate rising forest damage from wildfire, pests, disease, storms, overcrowding and aging mortality. Alternative 2 would harmfully obstruct important harvest, thin, road and reforestation projects that are necessary management to achieve Forest Plan goals and community socio-economic contributions. Alternative 2 would harmfully thwart necessary projects to grow and sustain the private business forest management infrastructure and workforce that is essential to achieve Forest Plan goals and community socio-economic contributions.

The future sustainability and growth of AOL member businesses is directly impacted by whether significant improvement can soon be achieved in statewide US Forest Service programs in quantity, quality, and cost effectiveness. We encourage effective national forest projects that promote accelerated active management of Oregon’s federal forests through sawlog harvest, regeneration, managed growth, and forest protection— especially via the restoration of increasingly-overcrowded and unhealthy forests. AOL operator businesses and forest sector manufacturers (collectively, sector “infrastructure”) seek a more reliable quantity of viable forest management projects and valued timber supply that would fund accelerated forest restoration of Oregon national forests.

The future sustainability of Oregon’s eleven national forests—and their now-declining condition—is dependent on the viability and sustainable growth of the private forest sector infrastructure statewide, located in several key working circles. We are keenly concerned for the future of the now-declining ecosystem health and eroding condition of Oregon’s national forests, and the surrounding natural resource-producing communities.

As a result of three decades of dramatic decline in harvest activity, the National Forest System has suffered unprecedented declines in forest health resulting from overstocking, stand stagnation, and drought stress. In 1999, the Forest Service said that about 39 million acres of National Forest lands were “at high risk from catastrophic fires.” Today, that total has skyrocketed to over 89 million acres.

Regrettably, because of nearly three decades of declining (and less reliable) national forest management, Oregon’s private forest sector infrastructure statewide continues to experience declining investment and productive capacity. In parallel, the rural national forest communities also continue to have declining resiliency, investment, workforce, and vitality.

And, I sense that further harmful forest infrastructure attrition is imminent in Oregon, without urgent improvement in US Forest Service land management project quantity, value, and certainty. This urgency is especially urgent in eastern and southwest Oregon, where forest sector disinvestment and rural community privation has been chronic and become dire—largely related to waning national forest project viability and quantity.

Oregon national forest future providence is dependent on the capacity of their nearby private forest sector and rural communities. Frankly, Oregon national forests and their future managed condition will rely on the agency's transformed recognition that the socio-economic vitality of private forest sector infrastructure must urgently become a vitally-important driver in all forest planning and project decision making. The true sustainable future of Oregon national forests—more than any other issue today—is wedded to a markedly improved socio-economic well-being of private forest sector infrastructure and expanded economic development within its tributary rural communities.

Were we to ignore addressing these serious socio-economic realities today in Oregon national forest management, then too many key Oregon forest working circles would predictably suffer the supporting forest sector exodus experienced in the US four-corner states of AZ, NM, UT, and CO (where negligible forest infrastructure remains). There once existed a robust forest sector in those states; but prohibitory national forest management since 1990 has resulted in its tragic elimination. In those four-corner states, today tens of millions of acres of national forests are in a calamitous status and wanting for economic partners and markets to aid in US Forest Service land management to remedy the forest health calamity.

These harmful fates would worsen under the proposed NOGA DEIS Alternative 2. Forest condition and infrastructure declines are a preventable and unacceptable outcome for Oregon's eleven national forests under the DEIS proposal.

We see a destructive disconnect between the important values of local Forest Plan goals/sustainability, and the substance of the proposed Amendment as outlined in the DEIS. More specifically, we believe that there is a harmful disconnect between the challenges that Forest Service practitioners and their partners face when pursuing active forest management to mitigate threats— and the standards and guidelines proposed in the Amendment that are ostensibly designed to obstruct active forest management.

In summary. We oppose that the proposed approach would further obstruct necessary and important forest management project accomplishment, while offering harmfully-little management on old-growth forested acres outside those already in low- to no-management land allocations. We acknowledge that the proposed NOGA amendment is well intentioned and acknowledges some benefits of active forest management, including harvesting and thinning -- but the net consequence of the NOGA would harm the eleven national forests in Oregon.

The NOGA DEIS proposal would impose significant new burdens on the staff of the Forest Service, through a forest planning process that is already barely functioning. Forest planning has largely devolved to an exercise of binding constraints on management, with optional goals that are subsequently not meaningfully monitored. The Department now proposes throwing this already

dysfunctional process into deeper dysfunction, by adding needless restrictive language on timber harvesting. Such restrictions have proven to have no beneficial effect on the worsening trajectory of aging and overcrowded old forests in national forests.

We oppose that the proposed NOGA would harmfully contribute to the loss of old growth national forests. The two-year period when adaptive strategies are developed would result in both the loss of staff capacity for needed more productive work of: fuels reduction work, thinning, harvesting, roading, and reforestation. The proposed NOGA would harmfully cause additional administrative objection and litigation burdens that sap the agency's finite budgets and staff. The combined delays wrought by the NOGA would tragically promulgate more catastrophic fire to destroy more acres of old growth.

Thank you for the opportunity to comment about the US Forest Service Proposed NOGA DEIS, applicable to Oregon's eleven national forests, and national forests across America. If our comments create questions, please do not hesitate to contact me: 503-364-1330, or by email: rstorm@oregonloggers.org

Sincerely,
/s/ Rex D. Storm
Rex Storm, CF
Executive Vice President
Associated Oregon Loggers, Inc.