

September 20, 2024

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124
Attn: Jennifer McCrae, Forest Service Team Leader

RE: Comments on National Old-Growth Amendment DEIS

Dear Ms. McCrae:

These comments are submitted on behalf of Lincoln County, Montana and are supplementary to the comments submitted on February 2, 2024 regarding the proposed National Old-Growth Amendment (“NOGA”).

The Forest Service has assessed the LRMP for the Kootenai National Forest as “Category 2”, defined as:

Category 2—If the unit’s plan components are already considered to be functionally meeting the intent of NOGA (e.g. recently revised or amended plans that already include desired conditions, standards and guidelines that align with NOGA) or the unit has standards/guidelines that apply forest-wide and are perceived to be as restrictive as those proposed for NOGA, this unit is not likely to experience overly noticeable change in terms of old growth plan direction, though there could be slight nuances that need attention when proposing project-level activities.

Draft Environmental Impact Statement (“DEIS”) at C-2.

The Forest Service states that the entire NOGA package will be applied to Category 2 Forests “unless there are unique circumstances presented that would justify not amending them with the full suite of proposed plan components.” DEIS at C-4. The overview of unit management direction for old growth indicates that the Kootenai Forest Plan contains old growth components. These include forest-wide desired conditions, standards and guidelines. The Forest Service concludes that the KFP’s direction functionally meets the intent of NOGA. DEIS at C-6. All of the applicable Plan direction was included in the County’s comment letter of February 2, 2024.

The Forest Service also found that the KFP has a narrative definition of old growth and quantitative criteria for old growth, and also explicitly uses regional criteria to identify old growth. DEIS at C-13.

The Forest Service has found that the existing provisions of the Kootenai Forest Plan are sufficient to meet the intent of NOGA. The 2012 Planning Rule requires the responsible official to “[b]ase an amendment on a preliminary identification of the need to change the plan.” 36 C.F.R. § 219.7(c)(2)(i). We see no need to change the plan when it already meets the intent of the proposed amendment. This is true not just of the Kootenai

NF but of many of the Category 2 Forests, several of which are in Montana or Northern Idaho and thus support forest products infrastructure in our region. DEIS at C-2.

We urge you to remove the Kootenai along with all other Category 2 Forests from the NOGA and to take a closer look at the Category 3 Forests to determine whether the more restrictive provisions of NOGA are actually needed.

Sincerely,

Lincoln County Board of Commissioners