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Title:

Comments: Lolo Plan Revision Economic Input

Amanda and Colin:

Thank you for the note back and included are some of our Coalitions thoughts and concerns about the Economic Section of the Lolo Forest Plan Revision. I have been reading the Lolo Assessment and found in the Economics Section:

Much of the information in this assessment was taken from the Economic Profile System maintained by

Headwaters Economics

(<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fheadwaterseconomics.org%2Fapps%2Feconomic-profile-system%2F&data=05%7C01%7C%7C802846334b84487aad6308db768888e3%7Ced5b36e701ee4ebc867ee03cfa0d4697%7C0%7C0%7C638234102269723296%7CUnknown%7CTWfpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=bG3drHGu%2FC6euC7wzMPMdeN8hFBr8HUX%2FCw66cHei8c%3D&reserved=0>). This toolkit

was developed in partnership with the Bureau of Land Management and the U.S. Forest Service. The

Economic Profile System is a free software application that produces detailed socioeconomic reports of

communities, counties, states, and regions, including custom aggregations and comparisons. The

Economic Profile System uses published statistics from federal data sources, including, but not limited to,

the Bureau of Economic Analysis, the Bureau of Labor Statistics, and the Census Bureau and American

Census. Other significant sources of information used for this report include the following:

- * Publications on Montana's forest products industry by the University of Montana Bureau of

Business and Economic Research,

- * Data on Forest Service programs,

- * Salary and non-salary expenditures, and employment from Forest Service corporate databases,

- * IMPLAN data for the year 2019

Colin and Amanda:

Our coalition's concern is that the Headwaters information does not include a lot of the smaller contractors and operators that do work in the Forest and in secondary manufacturing but do not report or file unemployment insurance reports to the State and Counties. In this respect we are very worried about getting an accurate assessment of how many jobs are generated from timber harvest on the Lolo National Forest. Earlier this year

we met with staff from the BBER and they felt that the Economic Analysis for the both the Helena-Lewis and Clark and the Custer-Gallatin Forest Plan Revisions underestimated the number of forestry related jobs that are generated with each million board feet of harvest. Again, they pointed to the fact that many small contractors do not file unemployment records and are not counted in the calculation. Further Sam Scott from BBER suggested that the true number of jobs created both direct and indirect for every million board feet harvested ranges from 18-20 jobs/mmbf.

Our Coalition STRONGLY suggests that the Economics team bring in staff from the University of Montana BBER to help get the most accurate portrayal of the economic impacts of timber harvest on the Lolo. The Forest Products that are removed from the Lolo impacts many counties in both Montana and Idaho and these need to be considered in the economic analysis

Further, I reviewed both the HLC and C-G Forest Plan Revisions, and made comments. In fact I think I even spoke with Colin. I could never understand the tables you had in each of those Revisions that discussed jobs and dollars for timber based on the different harvest volumes Alternatives. For Example the Existing Allowable Cut was higher in the old Plan for the C-G than any of the Proposed Alternatives in the New Plan yet the jobs and dollars were considerably higher for all of the proposed alternatives. I am attaching those graphs Tables 68 and 69 from the C-G Plan to better explain my concerns and hopefully get clarification. Our coalition would like for you to take a different approach that has more transparency and better accountability for the job sector.

I am also including three studies that discuss employment that is tied to timber harvest.

1. Montana's Forest Products Industry and Timber Harvest, 2018--compiled by the Forest Service.
2. Employment and Wage Impacts of Timber Harvesting and Processing in the United States--Sorenson et.al.
3. THE IMPACT OF TIMBER HARVEST DECLINES ON THE RAVALLI COUNTY ECONOMY---BBER

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