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First name: Bryan

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Organization: KLM Contracting

Title: Secretary/Treasurer

Comments: Bryan Lorengo KLM Contracting RE: Land Management Plan Directions for Old-Growth Forest Conditions Across the National Forest System #653564 To Whom It May Concern, KLM Contracting is a multi-generation family logging business that provides direct employment to 17 fulltime employees in Anaconda and Philipsburg, MT. Our business is reliant upon National Forest System Lands and their ability to meet their land management goals through active forest management. We are pleased to see the data that the agency provided to the administration in regards to old-growth and the challenges to protecting these stands. The analysis identifies that wildfire is the primary threat to old-growth followed closely with insects and disease (96% combined). It also highlights that timber harvest (4%) is minor threat compared to wildfire, insects and disease. We are deeply concerned that this Executive Order, rather than facilitating effective mitigation against the threats posed by wildfire, insects, and disease, might create additional roadblocks to reducing forest fuels. Also, it may impede efforts to enhance forest health, particularly in stands most vulnerable to these disturbances. Moreover, we fear that this order might inadvertently facilitate litigation against projects aimed at fuel reduction and improving forest health. The Executive Order has significant potential to impede the goals outlined in the Wildfire Crisis Strategy by increasing exposure to litigation. This could lead to delays or restrictions on crucial forest management activities necessary to mitigate wildfire risks, ultimately compromising the effectiveness of the strategy and endangering communities. As someone that has been engaged in recent forest plan revisions both on the Helena/Lewis and Clark National Forest and the Custer/Gallatin National Forest, I strongly believe in fostering local engagement and participation to ensure effective policy implementation. I have deep concern with amending all 128 land Management Plans in one EIS to be completed in one year. We have concern that what comes out of this will directly contradict not only the 10 year Wildfire Crisis Strategy but the acres identified in Montana's Forest Action Plan developed under Governor Steve Bullock. In addition, we would like you to consider the following as a solution to protecting old-growth stands. We strongly believe that science based active forest management is the solution to improving and protecting old growth stands all while addressing the wildfire crisis. Active forest management also fosters forest health and resilience and is the answer to insect and disease threats on our National Forest System Lands. Thank you for the opportunity to comment on Executive Order 14072. Please reach out with any questions or concerns. Respectfully Submitted. Bryan Lorengo KLM Contracting