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Organization: Neiman Timber

Title: Black Hills Operations Manager

Comments: Attachment: MOG\_NTC Comments.pdf - Is their comments.

February 2, 2024

Director, Ecosystem Management Coordination

201 14th Street SW Mailstop 1108 Washington, DC 20250[ndash]1124.

Re: Federal Register Notice FR 88, No. 243 88042 [ndash] 88048

Dear Director:

On behalf of Neiman Timber Company, LC, we appreciate this opportunity to comment on the above captioned Federal Register Notice.

Neiman Timber Company (NTC) is a purchaser of federal timber from multiple National Forests in both Region 1 and 2. We have been involved in partnering with the US Forest Service for many decades to help manage our National Forests and create resilient landscapes. NTC Comments NTC opposes the proposed amendment of all NFS Forest Plans and recommends that the Secretary withdraw the proposal for the following reasons:

- The Notice of Intent (NOI) fails to meet the requirements for a Need for Change of the cited 36 CFR 219.13(b)(1). The NOI Need for Change does not provide a basis for the mandatory amendments.
- The proposed amendment is unnecessary. The NOI itself states that there are currently over 2700 specific plan components in the current forest plans that address protecting and managing old growth.
- The proposed amendment process violates the 2012 Forest Planning Rule. This is true not only as stated above as it relates to the Need for Change, but the proposed process fails to meet the public participation requirements.
- The proposed amendment process also fails to meet the requirements of NEPA. The effects of the amendments will not be analyzed and disclosed under the required process outline in NEPA.

Thank you for this opportunity to comment and thank you for your consideration.