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Organization: Montana Logging Association

Title: Northwest Region Representative

Comments: September 17, 2024 Director, Ecosystem Management Coordination  
Attn: Jennifer McCrae, Forest Service Team Leader  
Dear Ms. McCrae: On behalf of the Montana Logging Association (MLA) and its members, thank you for the opportunity to submit comments on the Draft EIS published June 2024 entitled [Idquo]Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System,[rdquo] also known as the National Old-Growth Amendment or [Idquo]NOGA[rdquo]. MLA is Trade Association that represents 450 family owned/operated businesses in the harvesting/transporting of wood products in Montana. A number of our member[rsquo]s partner with the U.S. Forest Service and Bureau of Land Management using their expertise, employees and equipment to achieve forest management goals. The MLA supports the no action alternative described in the NOGA. The proposed amendment fails to meet the standards and intent of the 2012 Planning Rule. The entire process lacks significant public engagement/involvement at the local level due to the hastened timeline for development. In addition, the analysis failed to assess the impacts on local communities, ecosystems, and economic outcomes. The agency claims that the amendments will have no effect on the amount of timber produced or the lands suitable for timber harvesting. However, the amendment directs the Forest Service to develop an adaptive management strategy for the conservation of old growth and the recruitment of future old growth across all national forest systems. This action alone will limit management on suitable timberland acres, significantly impacting timber harvest. Lack of active management, wildfire and insects/disease are the primary impacts to old growth forests, not commercial timber harvesting. Science-based, active forest management improves forest health and resilience and is necessary to effectively protect the combined 823 million acres of federal forested lands and adjacent state and private property. The proposed plan will devolve into a years-long struggle among the National Forest Service regions to determine how to interpret and implement the amendments that will reach far beyond old growth forests. This is a distraction from the real threat to old growth forests, which is wildfire, insects, and disease and does nothing to address climate change initiatives. The preferred alternative prohibits proactive stewardship in old growth forests for the purpose of timber production even in the small percentage of Forests[rsquo] management areas specifically set aside for timber production. When combined with vague language such as [Idquo]Identify and prioritize areas for the recruitment, retention and promotion of old growth forests[rdquo] or [Idquo]Identify areas that have the inherent capability to sustain future old growth forests[rdquo] will absolutely stymie any forest management for the protection of old growth or otherwise. These statements will be used by litigants to further tie the agency[rsquo]s hands and prevent implementation of programs like the Wildfire Crisis Strategy, Collaborative Forests Landscape Restoration, and many others. The direction for old growth has been included in forest plans since the very first plans in 1984 and new direction for old growth management and conservation is being updated as Forest Plans undergo revisions. The Department has demonstrated no compelling need for change that justifies the proposed nationwide plan amendment. There is no evidence that additional [Idquo]consistent[rdquo] standards and guidelines for old growth will be more effective than the 2,700 existing plan components in meeting that purpose. The Forest Service has not demonstrated a [Idquo]need for change[rdquo] that necessitates an unprecedented effort to revise all 128 Forest Plans in such a short time span. Thank you for this opportunity to comment regarding the Forest Service[rsquo]s proposed amendment to 128 national forest land management plans to protect old growth. We reiterate our commitment to working with the Forest Service and BLM to help address our nation[rsquo]s wildfire and forest health crisis. Our members play an invaluable role in climate change mitigation through science-based, active forest management. We strongly encourage the Administration and federal land management agencies to prioritize and focus on action-based solutions to restore forest health, reduce the risk of catastrophic wildfires, and protection communities and public health. Sincerely, Tim McEntire  
Northwest Region Representative  
Montana Logging Association

ATTACHMENT: Word document public comment from Tim McEntire of the Montana Logging Association