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September 19, 2024Director, Ecosystem Management Coordination201 14th Street SW, Mailstop 1108Washington, DC 20250-1124Website: https://cara.fs2c.usda.gov/Public//CoinmentInput?Project=65356RE: Amendments to Land Management Plans to Address OId-Growth Forests Across theNational Forest System (NOGA) - Draft Environmental Impact Statement (DEIS)Dear Director, Ecosystem Management Coordination:On behalf of the member companies represented by Associated Oregon Loggers, Inc. (AOL), wesubmit the following comments on the proposed Amendments to Land Management Plans to AddressOld-Growth Forests Across the National Forest System (NOGA) [mdash] Draft Environmental ImpactStatement (DEIS).* We strongly oppose the Preferred Alternative 2, and urge the Forest Service to redirect toimplement the DEIS "No Action" Alternative 1.I am writing on behalf of Associated Oregon Loggers, Inc. (AOL), a trade association which representsmore than 1,000 logging and allied forest management member companies statewide. Thesecompanies play a major role in management of private and public forests throughout Oregon[mdash] asforestry contractors, purchasers, transporters, harvesters, road constructors, thinners, reforesters,firefighters, restorers, and vendors of forest management services. AOL member companiescommonly sub-contract or purchase Forest Service forestry, restoration, improvement, protection, andreading contracts. As such, AOL represents substantial expertise in management of Oregon's elevennational forests[mdash]comprising 14.1 million acres or 48% of Oregon forestland statewide.AOL is a member partner of both the American Forest Resource Council (AFRC), and the FederalForest Resource Coalition (FFRC). Both these organizations have submitted detailed fonnal writtencomments concerning the NOGA DEIS. As such, we concur with those two separate fonnal commentletters, and we support their more detailed remarks and recommendations.* We support comments submitted on the NOGA DEIS by American Forest ResourceCouncil, and the Federal Forest Resource Coalition.We support the no action alternative described in the NOGA. The Preferred Alternative 2, asdrafted, violates the National Forest Management Act and the 2012 Planning Rule. Additionally, theDEIS fails to take the "hard look" at consequences of the preferred alternative required by the NationalEnvironmental Policy Act. The analysis of the economic impacts of the proposal are inadequate.Adopting the preferred alternative would plunge the Forest Service into chaos and less projectaccomplishment, while the agency is already over-burdened by grappling with significant wildfire,budget, and administrative challenges.We have the following objections to the NOGA DEIA proposal:1. The agency has not demonstrated a need for change2. Violations ofNFMA and the Planning Rule3. Alternative evaluations are misleading and inaccurate4. Several components of the proposal are unnecessarily inefficient, costly, destructive, and/orinaccurate, including:o Distinctive Roles and Contributions; Goals; Management Approaches; DesiredConditions; Objectives; Standards; Guidelines; Plan Monitoring; "resilience"misapplication; and The wrong-headed conclusion that "no effects are expected ontraditional timber industry jobs in logging, wood product manufacturing, and pulpproduction" is completely unfounded and errant.NOGA DEIS Alternative 2 would obstruct sustainability and harm infrastructure. As proposed,Alternative 2 is counter-productive. Alternative 2 would harmfully-increase bureaucratic red tape,which would hinder critical forest management efforts needed to mitigate rising forest damage fromwildfire, pests, disease, storms, overcrowding and aging mortality. Alternative 2 would harmfullyobstruct important harvest, thin, road and reforestation projects that are necessary management toachieve Forest Plan goals and commimity socio-economic contributions. Alternative 2 wouldharmfully thwart necessary projects to grow and sustain the private business forest managementinfrastructure and workforce that is essential to achieve Forest Plan goals and community socioeconomiccontributions.The future sustainability and growth ofAOL member businesses is directly impacted by whethersignificant improvement can soon be achieved in statewide US Forest Service programs in quantity,quality, and cost effectiveness. We encourage effective national forest projects that promoteaccelerated active management of Oregon's federal forests through sawlog harvest, regeneration,managed growth, and forest protection[mdash] especially via the restoration of increasingly-overcrowdedand unhealthy forests. AOL operator businesses and forest sector manufacturers (collectively,

sector"infrastructure") seek a more reliable quantity of viable forest management projects and valued timbersupply that would fund accelerated forest restoration of Oregon national forests.The future sustainability of Oregon's eleven national forests[mdash]and their now-declining condition[mdash]isdependent on the viability and sustainable growth of the private forest sector infrastructure statewide,located in several key working circles. We are keenly concerned for the future of the now-declineingecosystem health and eroding condition of Oregon's national forests, and the surrounding naturalresource-producing communities.As a result of three decades of dramatic decline in harvest activity, the National Forest System hassuffered unprecedented declines in forest health resulting from overstocking, stand stagnation, anddrought stress. In 1999, the Forest Service said that about 39 million acres of National Forest landswere "at high risk from catastrophic fires." Today, that total has skyrocketed to over 89 million acres.Regrettably, because of nearly three decades of declining (and less reliable) national forestmanagement, Oregon's private forest sector infrastructure statewide continues to experience declininginvestment and productive capacity. In parallel, the rural national forest communities also continue tohave declining resiliency, investment, workforce, and vitality.And, I sense that further harmful forest infrastructure attrition is imminent in Oregon, without urgentimprovement in US Forest Service land management project quantity, value, and certainty. Thisurgency is especially urgent in eastern and southwest Oregon, where forest sector disinvestment andrural community privation has been chronic and become dire[mdash] largely related to waning nationalforest project viability and quantity.Oregon national forest future providence is dependent on the capacity of their nearby private forestsector and rural communities. Frankly, Oregon national forests and their future managed conditionwill rely on the agency's transformed recognition that the socio-economic vitality of private forestsector infrastructure must urgently become a vitally-important driver in all forest plaiming and projectdecision making. The true sustainable future of Oregon national forests[mdash]more than any other issuetoday[mdash]is wedded to a markedly improved socio-economic well-being of private forest sectorinfrastructure and expanded economic development within its tributary rural communities.Were we to ignore addressing these serious socio-economic realities today in Oregon national forestmanagement, then too many key Oregon forest working circles would predictably suffer the supportingforest sector exodus experienced in the US four-comer states ofAZ, NM, UT, and CO (whereniegligible forest infrastructure remains). There once existed a robust forest sector in those states; butprohibitionary national forest management since 1990 has resulted in its tragic elimination. In thosefour-comer states, today tens of millions of acres of national forests are in a calamitous status andwanting for economic partners and markets to aid in US Forest Service land management to remedythe forest health calamity.These harmful fates would worsen under the proposed NOGA DEIS Alternative 2. Forest conditionand infrastmcture declines are a preventable and unacceptable outcome for Oregon's eleven nationalforests under the DEIS proposal.We see a destructive disconnect between the important values of local Forest Plan goals/sustainability,and the substance of the proposed Amendment as outlined in the DEIS. More specifically, we believethat there is a harmful disconnect between the challenges that Forest Service practitioners and theirpartners face when pursuing active forest management to mitigate threats[mdash] and the standards andguidelines proposed in the Amendment that are ostensibly designed to obstruct active forestmanagement.In summary. We oppose that the proposed approach would further obstruct necessary and importantforest management project accomplishment, while offering harmfully-little management on old-growthforested acres outside those already in low- to no-management land allocations. We acknowledge thatthe proposed NOGA amendment is well intentioned and acknowledges some benefits of active forestmanagement, including harvesting and thinning - but the net consequence of the NOGA would harmthe eleven national forests in Oregon.The NOGA DEIS proposal would impose significant new burdens on the staff of the Forest Service,through a forest planning process that is already barely functioning. Forest planning has largelydevolved to an exercise of binding constraints on management, with optional goals that aresubsequently not meaningfully monitored. The Department now proposes throwing this alreadydysfunctional process into deeper dysfunction, by adding needless restrictive language on timberharvesting. Such restrictions have proven to have no beneficial effect on the worsening trajectory ofaging and overcrowded old forests in national forests.We oppose that the proposed NOGA would harmfully contribute to the loss of old growth nationalforests. The two-year period when adaptive strategies are developed would result in both the loss ofstaff capacity for needed more productive work of: fuels reduction work, thinning, harvesting, reading,and reforestation. The proposed NOGA would harmfully cause additional administrative objectionand litigation burdens that sap the agency's finite budgets and staff. The

combined delays wrought bythe NOGA would tragically promulgate more catastrophic fire to destroy more acres of old growth.Thank you for the opportunity to comment about the US Forest Service Proposed NOGA DEIS,applicable to Oregon's eleven national forests, and national forests across America. If our commentscreate questions, please do not hesitate to contact me: ATTACHMENT: AOL NOGA comment091924.pdf - this is the same content that is coded in text box; it was originally included as an attachment