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Comments: Please accept our attached comment letter.

Dear Sir of Madam:

Thank you for the opportunity to comment on Federal Register Notice Vol. 88, No. 243 88042-88048 proposing to amend 128 national forest land management plans to protect old growth.

Idaho Forest Group (IFG) is one of the largest producers of softwood lumber in the U.S. with seven manufacturing facilities in Idaho and Mississippi capable of producing well over 1 billion board feet of lumber annually. A large portion of our raw material supply comes from Region 1 and Region 4 of the U.S. Forest Service. Our 2,000+ employees, contractors, and other service providers live and work in the mostly small, rural communities surrounding our facilities where forestry as well as recreation and tourism are significant components of the economy and influence their quality of life. Likewise, the negative effects of wildfire and the current forest health crisis resulting from the lack of active management on public lands also have very real impacts on the overall health and vibrancy of local communities.

The Forest Service should take advantage of this opportunity to increase the pace and scale of active management to improve forest health and resiliency to wildfire, insects, and disease that are responsible for the loss of millions of acres of mature and old growth on our national forests. The Forest Service should reconsider the current proposal of amending 128 Land Management Plans through a single Environmental Impact Statement developed in less than a year. This type of approach risks undermining public trust and confidence in the agency, the science it is relying on to inform its management approach, and any policy outcome around old growth.

Major forest policy decisions should be accomplished through robust local engagement and public participation, not through a top-down directive from Washington, D.C. Our national forests are dynamic systems, not static. They are also geographically and ecologically unique and require different approaches based on local conditions.

The Forest Service, and the public, would be better served through individual plan revisions and amendments at the Regional and forest levels. The Forest Service has determined that the most significant threat to old growth is wildfire, insects, and disease. So, any national forest amendment process for old growth should focus on increasing science-based, active forest management to address our wildfire crisis, and to make our forests healthier and more resilient.

Any final amendment must provide clear direction and specific recommendations for active forest management within and adjacent to existing old growth stands to protect them from these threats.

A nationwide plan amendment seeking [ldquo]consistency[rdquo] among forests is incompatible with what the Forest Service describes as [ldquo]vast variation in old-growth forest character that occurs across North America.[rdquo] The Forest Service notes that definitions (and forest characteristics) considered to be [ldquo]old growth[rdquo] are [ldquo]specific to vegetation types,[rdquo] and that [ldquo]even within a specific geographic area, no one definition represents the diversity of old-growth ecosystems.[rdquo] Unfortunately, in spite of its own analysis showing that old growth is a basket term that varies widely in age, tree size, stand structure by forest type and by stands, the Department is pursuing a top-down effort to establish nationwide

[ldquo]consistency[rdquo] that makes little sense. Again, the Forest Service, and the public, would be better served through individual plan revisions and amendments at the Regional and forest levels.

Thank you for your consideration of these comments.

Attachment: FRN Comments - 20240131_Idaho Forest Group.docx.pdf - is letter text added above.