

# GREAT LAKES INDIAN FISH & WILDLIFE COMMISSION

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## • MEMBER TRIBES •

### MICHIGAN

Bay Mills Community  
Keweenaw Bay Community  
Lac Vieux Desert Band

### WISCONSIN

Bad River Band  
Lac Courte Oreilles Band  
Lac du Flambeau Band

Red Cliff Band  
St. Croix Chippewa  
Sokaogon Chippewa

### MINNESOTA

Fond du Lac Band  
Mille Lacs Band



August 30, 2022

Jamie Barbour, Assistant Director  
Forest Service Ecosystem Management Coordination  
U.S. Forest Service  
1400 Independence Ave., SW  
Washington D.C. 20250

Subject: GLIFWC Response to Federal Old-Growth and Mature Forests RFI

Dear Assistant Director Barbour,

Staff of the Great Lakes Indian Fish and Wildlife Commission (GLIFWC) write in support of the Earth Day Executive Order on Strengthening the Nation's Forests Communities, and Local Economies. A wide variety of ecosystems and habitats, including old-growth, is necessary for the full implementation of tribal treaty rights, and defining, identifying, and completing an inventory of old-growth and mature forests on Federal Lands is vital. Staff at GLIFWC understand that the Forest Service will be reaching out to initiate government-to-government consultation with tribes in the near future.

GLIFWC is an intertribal natural resources agency exercising delegated authority from eleven federally recognized Indian tribes in Michigan, Minnesota, and Wisconsin.<sup>1</sup> These tribes retain reserved hunting, fishing, and gathering rights on lands in territories ceded to the United States. The Ojibwe Tribes' reserved treaty rights have been upheld in a series of federal court cases, not only to take, but to conserve and protect beings and protect vital ecosystems that support the exercise of treaty-reserved rights. This letter does not preclude member Tribes' individual viewpoints on the proposal in their own sovereign

**"You don't just cut down an old tree because it's too big, that's being rude."**

- Dr. Wendy Makoons Geniusz,  
Professor of Decolonization and  
Indigeneity, Dept. Of Sociology,  
York University

<sup>1</sup> GLIFWC member tribes are: In Wisconsin – the Bad River Band of the Lake Superior Tribe of Chippewa Indians, Lac du Flambeau Band of Lake Superior Chippewa Indians, Lac Courts Oreilles Band of Lake Superior Chippewa Indians, St. Croix Chippewa Indians of Wisconsin, Sokaogon Chippewa Community of the Mole Lake Band, and Red Cliff Band of Lake Superior Chippewa Indians; in Minnesota – Fond du Lac Chippewa Tribe, and Mille Lacs Band of Chippewa Indians; and in Michigan – Bay Mills Indian Community, Keweenaw Bay Indian Community, and Lac Vieux Desert Band of Lake Superior Chippewa Indians.

capacities. These rights are recognized and regulated through a long-standing Memorandum of Understanding (MOU) between the Forest Service and GLIFWC member tribes that exercise their treaty rights within the National Forests.

As an initial matter, it may be appropriate to pause current planned logging operations in areas that may contain old-growth until the inventory contemplated by the President's Executive Order can be completed. We understand that one such area may be Fourmile Vegetation Project within the Chequamegon-Nicolet National Forest, Eagle River-Florence Ranger District, but certainly there are others. The Four Mile area is one of two small areas in Wisconsin in which the American marten lives. Waabesheshi (marten in Ojibwe) is a tribal clan animal that is classified as Endangered in Wisconsin and relies on forests with old growth characteristics.

Anishinaabe Oral Tradition includes a story about 'the great cutover' in the Upper Great Lakes Region: "*Naanabozho and Paul Bunyan.*"<sup>2</sup>

A hundred years ago, Nannabozho was walking along the St. Croix River in Minnesota when he heard a great cry of distress from the northwest. He heard the *binewag*, partridges, drumming out the distress call on the hard ground. Then Naanabozho heard the *maangwag*, loons, take up the call as their long, long haunting voices echoed across the lakes. As Naanabozho started to run toward the call he heard the *makwag*, bears, all stomping and huffing. Then the *bizhiwag*, lynx, and the *gidagaa-bizhiwag*, bobcat started to scream in their highest most frightened voices. The *zhiishiibag*, ducks, were quacking hysterically, and the *nikag*, Canada geese, were honking their deepest most terrified calls. As Naanabozho ran he heard the cries of his relatives the Anishinaabeg, too. He ran and he ran until he had covered the two hundred miles from the St. Croix to the deep Northwoods in record time.

As he ran through the woods the cries and honks and quacks and screams and huffs and drumming changed to "Naanabozho is coming! Naanabozho is coming!"

It was a very tired Naanabozho who stumbled into the camp of his relatives the Anishinaabeg, where he was quickly told that the loggers with their great champion Paul Bunyan were clear-cutting the pines. Naanabozho stopped only long enough to reassure his relatives that he would try his best to help before he rushed on toward the sound of the crashing trees.

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<sup>2</sup> Geniusz, Mary Siisip. *Plants Have So Much to Give Us, All We Have to Do Is Ask: Anishinaabe Botanical Teachings*. University of Minnesota Press. 2015.

According to Mary Siisip Geniusz: "This is my retelling of a story told in the 1950s to a group of researchers, working on a grant from the University of Minnesota Fund for Regional Writing, who were trying to determine the status of the oral tradition among the Minnesota Ojibwe. They determined that mostly the elders in the Ojibwe communities kept the tradition. They said their youngest storyteller had been born in 1903. Coleman Bernard, Ellen Frogner, and Estelle Eich, *Ojibwa Myths and Legends* (Minneapolis: Ross and Haines, 1962), 99." The 'Northwoods' is what locals call the forested areas of Northern Minnesota, Michigan, and Wisconsin. In Laura Ingles Wilder these areas may have been referred to as the "Big Woods."

He found Paul Bunyan swinging his ax and cutting down a whole row of three-hundred-year-old *zhingwaakwag*, white pines and *apakwanagemagoog*, red pines, with one swing. The giant trees crashed to the ground before Paul Bunyan's ax as if they were so much grass being felled by a gardener swinging a knife.

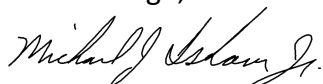
Naanabozho called out to Paul Bunyan, **“Hey, fella. Stop that! Creator gave the trees to my relatives the Anishinaabeg, and their four-legged and winged and creeping Elder Brothers, too. This is their home. They need these trees. Without them, nothing will be able to live in this land [emphasis added].”**

Well, Paul Bunyan hardly paused in his swing to listen to Naanabozho, so pretty soon the fight started. Naanabozho and Paul Bunyan argued and roared, wrestled and fought each other for three long days and even longer nights. Pretty soon it sounded like *wese'an*, there was a tornado! All of the loggers and all of the Anishinaabeg and all of the birds and animals hid, trembling at the din they made.

The Anishinaabeg say that Naanabozho must have won that battle, or there would not be one tree left standing in the north woods today.

A complete inventory of mature and old growth forests to enable and support tribal cultural and subsistence activities, protect biodiversity, and offset climate impacts will affirm the federal government's treaty obligations and trust responsibility, and should be undertaken expeditiously. Planned cuts that may impact these areas should be paused until the inventory is completed.<sup>3</sup> GLIFWC looks forward to working with the U.S. Forest Service and the Bureau of Land Management during tribal consultation to ensure that future generations of Ojibwe people can continue their Treaty protected relationship with all the natural beings.

Weweni sa go,



Michael J. Isham, Executive Administrator  
Great Lakes Indian Fish and Wildlife Commission

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<sup>3</sup> Exec. Order No. 14,072, 87 Fed. Reg. 24851 (April 22, 2022), Strengthening the Nation's Forests, Communities, and Local Economies; Order No. 3,403, (November 15, 2021), Joint Secretarial Order on Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters