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First name: Steve

Last name: Mortensen

Organization: Leech Lake Band of Ojibwe - Division of Resource Management

Title: Interim Division Director

Comments: See attachment

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To whom this may concern,

This letter is in regards to Executive Order 14072, Section 2: Define, identify, and complete an inventory of old growth and mature forests on federal land. Old growth forests are very important to the Leech Lake Band of Ojibwe (LLBO). They provide habitat for many of our threatened, endangered, and sensitive species, as well as, provide several important ecological functions, such as carbon storage and nutrient cycling. They are culturally significant to the Band and are utilized for a variety of foods, medicines, and ceremonial practices. Identifying and protecting old growth forests is a priority to the Leech Lake Band. We believe old growth and mature forests are more than just the age of a stand, but rather the totality of characteristics the stand has. We hope during your process of defining old growth and mature forests you take the following characterizations in consideration:

- Presence of coarse woody debris in various stages of decay
- Presences of snags, with an emphasis on high quality ones
- Multi-layered canopies
- Biodiversity present in stands, including tree species and ages, as well as, wildlife and plant species present
- Structural diversity both within a stand and at a landscape scale

In addition to identifying and protecting old growth and mature forests we hope you have the foresight to further expand upon this executive order to consider areas that could become old growth and mature forest. A forest with old growth characteristics that coincides with a proper Native Plant Community Classification will be best poised to be resistant and resilient in the continuing onset of climate change. Through decades of timber harvest, with a commercial focus on early successional species, we have lost most of our old growth forests and we hope one day to have more of it back on the landscape where the LLBO citizens have retained treaty rights. This will need to be an emphasis on the Chippewa National Forest (CNF); it is already a Desired Vegetative Condition (DVC) of LLBO resulting from a letter sent from former United States Forest Service (USFS) Chief Todd Tidwell to the CNF. To do this we will need to collaboratively identify stands suitable of this type of restoration and, over time, work towards this DVC of developing more forests with old growth characteristics. Although old large-diameter trees are the typical measurement of old growth forest, there are a number of silvicultural practices that can be done with a forest over the time it takes to become mature that will benefit a whole host of flora and fauna species that require old growth forests. Many of these traits are mentioned above and should be the emphasis for early efforts. For example, a forest may not have ecologically mature trees, but projects initiated to consciously retain/increase structure, diversity and large coarse woody debris will meet the needs of many of the species that require these stand conditions for survival. The other consideration in our part of the world is that you cannot have "functional" growth simply by having old trees. The old growth characteristics mentioned above must be in place to have these stands properly function as the system they are intended to be. Additionally, this work must be done at a landscape scale with a focus on wildlife corridors and other forest linkages to ensure sufficient size and connectivity so functioning old growth habitat can be minimally influenced by outside forces and non-native/invasive species. These tracts must be large enough so edge species, like deer, are not a dominant driver of the vegetation in the system. The question of "What is a healthy old growth forest?" often comes up. From our perspective, a healthy old growth forest contains a myriad of species in the amounts and ages that would be naturally expected in these types of mature forest communities, including wildlife and flora. We appreciate your consideration of our comments. If you have any questions, or would like to discuss these priorities in greater detail, please reach out to LLBO Division of Resource Management staff:

- Forestry Director, Keith Karnes, keith.karnes@llojibwe.net
- Fish and Wildlife Director, Steve Mortensen, [steve.mortensen\(a\),llojibwe.net](mailto:steve.mortensen(a),llojibwe.net)
- Wildlife Biologist, Tanya Roerick, tanya.roerick@llojibwe.net
- Plant Resource Program Director, Kate Hagsten, [kate.hagsten\(@,llojibwe.net](mailto:kate.hagsten(@,llojibwe.net)

Sincerely, Steve Mortensen
Interim Tri-Division Director
Division of Resource

ManagementLeech Lake Band of Ojibwe