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First name: Henry

Last name: Schienebeck

Organization:

Title:

Comments: DUPLICATE LETTER TO 6363, coded that letter. Made this letter unique so commenter contact info was not suppressed in author fields.

GLTPA Comments on Fed. REG. 43493-42494 Vol. 87, No. 135 July 15, 2022

Mr. Jamie Barbour

Assistant Director

Ecosystem Management Coordination

USDA Forest Service

Washington DC

Dear Mr. Barbour,

Thank you for providing Great Lakes Timber Professionals Association (GLTPA) the opportunity to provide the following comments regarding the definition of "old growth and mature" forests. From GLTPA's perspective, trying to determine a durable definition of old growth and mature forests is a distraction taking away Forest Service's ability to concentrate on its priorities as directed in forest management plans which encompass every National Forest and BLM property.

GLTPA believes it to be an impossible task to develop a "one size fits all" scientific age or diameter for defining old growth or maturity. Any arbitrary limit based on tree or stand age or diameters, will make it impossible for these agencies to enact their respective 10-year management goals as agreed to by all those involved in the forest planning process. In fact, the time it will take to comply with this law will most certainly ensure that any fire prone forests will never make it to maturity or old growth.

The preamble to the Federal Register Notice states that the Department of Interior's Bureau of Land Management and the USDA Forest Service "shall, within one year of the date of this order, define, identify, and complete an inventory of old-growth and mature forests on Federal lands."

Any such inventory must include all forested acres on all Federal lands. This includes 244.4 million acres of land managed by the Bureau of Land Management, 192.9 million acres of land administered by the USDA Forest Service, 89.2 million acres within the National Wildlife Refuge System, 79.9 million acres within the National Park System, and 8.8 million acres owned by the Department of Defense.

It is worth noting that more than 56 million acres of National Forests are identified as being more than 100 years old, and the National Park Service has, at a minimum, 4.8 million acres of old-growth forests on which commercial management is prohibited. Because cutting of trees on National Park Land is prohibited, every forested acre in the National Park System will eventually "mature," and all forested acres within the National Park System will eventually become "old growth" barring any natural disaster.

Any such inventory must also recognize that Forest Service and Bureau of Land Management properties already host significant areas ineligible for active timber management; 17.6 million acres of NFS lands are in Wild & Scenic River Corridors; 36.6 million acres of NFS lands are in Designated Wilderness Areas, and 58.2 million acres of NFS lands are in Inventoried Roadless Areas. While theoretically some non-commercial fuels reduction work could take place in an Inventoried Roadless Area, for all practical purposes they are off limits to commercial timber harvest, meaning, if the trees in those areas are not killed by wildfires, insects, or other disturbances, they will eventually achieve "old-growth" status. The total area of NFS lands in these restricted land use categories is almost three times larger than the 40 million acres of NFS lands designated as "suited for timber production," and is 27 million acres larger than the entire National Park System.

Similarly, forest management is extremely limited on the 85-million-acre National Wildlife Refuge System. The National Wildlife Refuge Act states that "No person shall disturb, injure, cut, burn, destroy, or possess any real property of the United States" (trees are considered real property) on a National Wildlife Refuge. Most forested lands on National Wildlife Refuges, therefore, will also grow to the maximum extent possible, subject to the natural limitations of each site and natural disturbances.

Why bring this to your attention? The fact is, is that unmanaged forests already make up a significant portion of our federal lands. The request for a definition for "old-growth" and "mature" trees comes from environmental advocacy groups who have a history of pressing for additional administrative set-asides on the National Forest System and Bureau of Land Management timberlands. These advocacy groups (nearly all of whom oppose all commercial timber harvest on Federal lands) claim Forest Service and BLM lands "have no enduring protection" and "are at imminent risk of being logged." Nothing could be further from the truth.

For instance, the Chequamegon Nicolet National Forest is approximated 1.5 million acres. Of this total only 353,000 acres, or approximately 24%, are available for vegetation treatment. The sustainable management implemented on these available acres is a major economic driver for multiple rural and underserved communities in Northern Wisconsin, Michigan, and Minnesota. If a definition utilizing factors such as 50 years of age or species were to be used in the definition, that alone would curtail ALL harvesting of Great Lakes Region national forests destroying local economies and communities. With the region's climate conditions, it often takes 50 years or more before the first entry into a Red Pine stand occurs and even longer for hardwood stands.

Despite the relatively small acreage available for vegetation management in the Lake States, the regions forests are relatively healthy, vibrant, and fully supportive in meeting the definition of "multiple use forests." Unmanaged forests, by contrast, are increasingly risky, unstable pools of carbon. Emissions from 2020 wildfires in California, which burned predominantly on National Forest System lands, emitted over 112 million metric tons of carbon dioxide. That's equivalent to the emissions from over 24 million gas powered passenger cars driven for one year. This is senseless. Also senseless is the loss of life, homes, and destruction of property because of a lack of sustainable forest management causing these catastrophic fires.

Most foresters in the Great Lakes Region and beyond will agree that the Menominee Tribal Forest in Wisconsin is a great example of forest management on property managed to provide its people with products and ecological value all citizens value. Forest management has taken place for hundreds of years on this property, and in viewing aerial maps, it is easily distinguished from bordering lands with its abundance of green, mature forests. In reading their history, Chief Oshkosh was asked how the Tribe should manage their timber and according to their history he stated:

"Start with the rising sun and work toward the setting sun, but take only the mature trees, the sick trees, and the trees that have fallen. When you reach the end of the reservation, turn, and cut from the setting sun to the rising sun and the trees will last forever."

We must recognize this exercise to come up with a definition for "old growth and mature" for what it is: an effort

to embellish the "threat" of timber harvest on Federal public lands while administratively setting aside additional acres from management, without any direction from Congress to do so.

Respectfully submitted on behalf of the Board of Directors and members of the Great Lakes Timber Professional Association.

Thank you for the opportunity to comment,

Sincerely,

Matt Jensen

GLTPA President

Henry Schienebeck

GLTPA Executive Director