Data Submitted (UTC 11): 8/30/2022 4:00:00 AM

First name: Susan B. Last name: McClanahan

Organization:

Title:

Comments: TWO of the logging projects in the Worth More Standing report were approved under the TRUMP Administration in 2020. I would doubt that this administration would want to implement the goals of the TRUMP Administration. One of his goals was "increasing logging in national forests by 72%.[5]."

Excerpted from: REPORT: Worth More Standing: 10 Climate-Saving Forests Threatened by Federal Logging. This report was prepared for the Climate Forests coalition, which works to protect mature and old-growth trees and forests from logging across America's public lands. Contributing organizations to the report include Applegate Siskiyou Alliance, Cascadia Wildlands, Center for Biological Diversity, Environment America, Environmen- tal Law and Policy Center, Earthjustice, Klamath Forest Alliance, Klamath Siskiyou Wildlands Center, Oregon Wild, Natural Resources Defense Council, Sierra Club, Southern Environmental Law Center, Standing Trees, The Larch Company, Wild Heritage and Yaak Valley Forest Council.

https://publicinterestnetwork.org/wp-content/uploads/2022/05/Worth-More-Standing.pdf

The Fourmile logging project was devised to help meet the Trump administration's goal of increasing logging in national forests by 72%.[5]

5 USDA Strategic Plan FY 2018 - 2022, p 51

https://www.usda.gov/sites/default/files/documents/usda-strategic-plan-2018-2022.pdf

1. BLACK HILLS NATIONAL FOREST, WYOMING AND SOUTH DAKOTA | BLACK HILLS RESILIENT LANDSCAPES PROJECT

The Black Hills Resilient Landscapes Project * This project authorized 180,000 acres, or 280 square miles, of "overstory removal." That's the Forest Service phrase for logging most of the mature trees and cutting any tree over 9 inches in diameter[hellip].

Carbon storage and biodiversity * Ponderosa pine trees, one of the longest-living tree species, can grow to become hundreds of years old and more than 200 feet tall. They develop thick bark and a deep root system that is well adapted to wildfire and drought. As these trees age, they pull carbon from the atmosphere and store it for centuries[hellip].

The future of mature and old-growth trees in Black Hills National Forest * Unsustainable overcutting has been going on for the past 15 years, targeting stands of old pine. More recently there have been beetle outbreaks and wildfire, two natural disturbances. Yet the pressure to sustain high levels of logging continues. That's despite the fact that the Forest Service's own scientists concluded that maintaining logging here at current levels "is not a sustainable option." ...The forest plan allows only 5% of the forest to survive to become old growth.

Project status * Logging began in 2018 [under the Trump Administration]. The Forest Service has refused to say how many acres have been logged.

Local contact: Dave Mertz, former forester, Black Hills National Forest, mertzdave1@gmail.com

TRUMP

4. Chequamegon-Nicolet National Forest, Wisconsin | Fourmile Vegetation Project

The Fourmile Project * The project would log 12,000 acres east of Eagle River, Wisconsin, including clearcutting 1,000 acres. The Forest Service wants to reduce what they regard as an "overabundance of older age" trees, thereby "regenerating older stands into new young stands." Based on Forest Service data, 53% of the stands to be logged are 80 years and older. The Fourmile logging project was devised to help meet the Trump administration's goal of increasing logging in national forests by 72%.[5]

5 USDA Strategic Plan FY 2018 - 2022, p 51

https://www.usda.gov/sites/default/files/documents/usda-strategic-plan-2018-2022.pdf

Carbon and biodiversity * Northern Wisconsin forests have been carbon sinks for at least the last two decades. Public lands sequester more carbon, on average, than private lands because they tend to be older and less intensely logged. The Forest Service did not conduct the required analysis of carbon pollution that would result from this logging project and it failed to consider recent climate science[hellip].

...Of the 12,000 acres of planned logging, 54% are stands 80 years and older, 33% are 100 years and older. The largest trees to be cut are upland hardwoods, red pine, maple and aspen. Wisconsin scientists warn that logging and roads will disturb maturing forest habitats, harm recreation and disrupt imperiled species.

The future of mature and old-growth trees in Chequamegon-Nicolet National Forest * Little old-growth forest remains in Wisconsin and there are few large tracts of mature trees. The Forest Service targeted mature trees in the Fourmile project because they said stands are "terribly skewed towards the older age classes." The forest plan calls for protecting interior hardwood forests, but the project would log these trees, squandering a critical opportunity to protect large blocks of contiguous forests and their carbon stores.

Project Status * The Forest Service approved this project in November 2020 [under the TRUMP administration], with a finding of no significant environmental impact.

Local Contact: Andy Olsen, Environmental Law and Policy Center, Aolsen@elpc.org

ATTACHMENT: Image "USDA - Key Performance Measures"