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Comments: September 18, 2024

Director, Ecosystem Management Coordination

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RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

F.H. Stoltze Land & Lumber Co. would like to comment in opposition of the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

As a professional Forester I enjoy mature and old growth forests tremendously. They provide a unique and special ecology for animals and the trees themselves are often extremely impressive. These types of forests are also extremely important carbon sinks, clean our drinking water, and hold important spiritual values to many people. The value of this forest condition cannot be overstated. However, the problem with the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System and draft DEIS is that it doesn't directly address the root cause of the largest threat to Mature and Old Growth (MOG) or provide any substantial sideboards for managing for this condition.

Based on the threat analysis conducted by the USFS on MOG it was determined that wildfire, insects and disease were the largest threat to these forests. This begs the question to What has changed in these fire-based ecosystems to cause fire which played a large role in establishing these old-growth forests now to become their largest threat?

In the United States we have been suppressing wildfires for over 100 years. In 1910 the "great burn" scorched over 3 million acres in the inland North West, Washington, Idaho, and Montana. This wildfire that claimed almost 100 lives and consumed numerous towns. Because of this large destructive fire and following fires the USFS established the 10 a.m. rule in 1935 to create a standard forest fire policy. This rule was established to suppress any new wildfires by 10 a.m. the following day before they could take advantage of the warming day and low humidity to grow, expand, and escape suppression efforts. Unfortunately, this well intended policy created the wildfire crisis of today and the largest threat to MOG forests.

In the West, forests have evolved with fire. Frequent fire of the past typically wasn't stand replacing like the wildfire we experience today. Fires of the past were generally smaller and burned much more mosaically due to reduced fuel loading through periodic burning. MOG forests were very resilient to this type of wildfire. Their bark was thick and the shade tolerant trees of the understory didn't live long enough or grow tall enough for fire to

climb up into susceptible crowns. Today, with wildfires being suppressed for nearly a century we see forests with extremely heavy fuel loading and ladder fuels that a normal fire adapted ecosystem would have not have. Frequent fire of the past used to kill these thin barked shade tolerant species before they became ladder fuels. Now, fires burn with much greater intensity and essentially climb into the crowns of Old Growth trees killing them. Also, the increased fuel loading across the landscape and on the forest floor provides fires of today much more fuel to burn when they do ignite. Thus, they essentially "cook" the root systems of these old trees and sterilize the soil inhibiting future growth instead of burning through the stands fast with lower intensity. Because of the lack of fire on the landscape the buildup of fuels, fires of today are much harder to suppress, control, and contain, when they do ignite.

Sometimes it's important to go back to the basics to address this wildfire crisis that threatens our MOG, lets review the Fire Triangle. The Fire Triangle is essentially a 3-legged stool composed of Heat, Oxygen, and Fuel. The only leg of this stool we can manipulate is fuel, fuel loading, and fuel arrangements. How then can we manage fuel? With active forest management. Active forest management includes proactively using mechanical treatments and fire to emulate frequent fire of the past. First, stands should be restored to natural stocking levels that were present with frequent fire and then maintained with fire or future scheduled mechanical treatments.

However, this is where the proposed Land Management plan falls short. In the MOG threat assessment, Commercial Timber Harvest was listed as of little to no threat to MOG forests. Mainly, because sawmills and equipment of today do not operate within these forests or are tooled to harvest these trees.

We know this to be true because we own and operate the oldest family-owned sawmill in Montana, F.H. Stoltze Land & Lumber Co. Stoltze has been managing our lands in Montana for over 112 years and we source 70% of our fiber supply from our surrounding national forests. Our sawmills today are not engineered for milling Old Growth. Our average top size at the sawmill is 7" and trees we harvest are anywhere from 25-200 years old.

Another reason to utilize commercial treatments are the many benefits that come from active forest management: clean water, enhanced wildlife habitat, and wood products that our society needs and which support our local forest communities. The list goes on; healthy resilient managed forests generally have higher vigor from having the proper stocking levels and more available nutrients and sunlight to flourish and resist insect attacks and disease, the second leading threat to MOG forests. Also, one of the most important attributes of forests is that they are a renewable resource. If managed properly they can continue to provide all the benefits listed above and more in perpetuity. Given all the reasons above, Why is active forest management not elevated as a mandatory tool within in the plan to protect and restore forest conditions, to eliminate threats, and elevate the possibility of increasing MOG within our national forests? The proposed plan should include more use of proactive management within forests if the goal is to reduce threats and increase the presence of MOG across the landscape.

Another fundamental problem with the proposed plan is that it puts no sideboards on how much or how little MOG each forest should have. In our opinion, the agency has not demonstrated a need for this forest plan revision and has written the plan with too much ambiguity. The ambiguous language used within the proposed plan will tie up the best tool we have for conserving MOG - active forest management in litigation for years to come which will lead to the further loss of MOG forests. This well intended proposed plan will actually speed up the loss of these forests.

We believe that MOG planning and management should really be addressed at the local level and during the normal forest plan revision process. Local forests know what they have, where they have it, and how best to conserve it. We don't need a top-down approach putting more red tape in front of management and providing legal fodder to serial litigants that are already causing over 1 billion board feet of timber to be tied up in litigation. Many of these projects suspended in litigation have recently burned in wildfires whilst waiting to be fought over in court and further deteriorated our environment, air quality, and likely destroyed adjacent MOG.

Another problem with the DEIS and proposed plan is that it elevates MOG above all other forest conditions. Forests are dynamic and change through time. Early seral forests, that are just starting out are typically composed of entirely different species as their late successional MOG counterparts. Different flora and fauna need a good balance of everything, from early to late-stage forests and all other stages in-between across the landscape to be balanced and healthy.

Also, USDA research has shown that managed forests sequester and store more carbon than those that are left unmanaged and preserved. MOG forest do store a lot of carbon but in actuality fast growing young stands and managed forests sequester and store more do to their regenerative nature and the long-term storage for forest products. This research will be attached below my comments.

Another problem with this DEIS and proposed plan is that there is no standard definition for mature forests. In Montana our trees grow really slow, on some sites it takes a trees 80 years to be the size of my coffee mug! It would be unrealistic to put an age cap or try to capture all forest types with a quote unquote "standard definition". Mature determination and old growth recruitment should be at the discretion of the local forests.

Additionally, the data being used to determine the amounts of MOG across our nation is skewed and biased. The Inventory analysis conducted by the USFS only examined FIA plots across USFS and BLM lands. This is a tremendous miscalculation and misleads the general public as to the resource MOG forests are as a whole as there are millions of acres in the National Parks System and National Monuments that contain MOG forests. These areas that were not taken into account are typically hands off to any active forest management and should be accounted for in a national inventory of MOG forests.

In conclusion, Stoltze would like the USFS to remove barriers to commercial treatments and active forest management and increase its use across the landscape to help reduce the largest threat to MOG forests - Wildfire. This plan does not do that, in fact it creates more barriers to management. For that reason, we feel this plan is unnecessary and faulted and recommend the No Action Alternative. If the USFS really wanted to conserve and promote more MOG forests, active forest management would be promoted throughout the proposed plan, but it is not. Forcing 128 forests to amend their forest plans will take their eye off the ball in terms of actual management and if implemented as written provide expansive legal battles that will halt management due to litigation of the unclear and ambiguous langue used in the proposal. This proposal should proceed with the No Action Alternative.

In addition to our comments F.H. Stoltze Land & Lumber Co. supports the comments written and submitted by the American Forest Resource Council (AFRC).

Thank you for the opportunity to comment.

Sincerely,

Cameron Wohlschlegel

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Attachments: Word document of public comments from Cameron Wohlschlegel of F.H. Stoltze Land & Lumber Company and a PDF of Timber Harvest and Carbon from the USDA.