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First name: Steven

Last name: Swanson

Organization: Swanson Group, Inc.

Title: President

Comments: My name is Steve Swanson and I serve as the President and CEO of Swanson Group. Swanson Group is a family owned forest products manufacturing firm in Western Oregon. We currently have over 800 employees working in family wage jobs in rural Oregon Communities. Swanson Group is wholly dependent on raw logs purchased on the open market and we are a large purchasers of public timber in Oregon. I write today to submit comments on the effort to inventory old growth and mature forests on Federal Land.

The effort to inventory old growth and mature forests is fraught with peril that could exacerbate public forest health and anemic log supplies in our region. If inventoried incorrectly the results could be disastrous for users of our multiple use forest land and even worse for O&C timberlands managed by the BLM.

Swanson's three mill facilities process a variety of log sizes, species and types, but we do not rely on old-growth timber for our log supply. Starting before the listing of the spotted owl, Swanson has invested 100's of millions of dollars in small, medium and large second growth log technology. I give this context because I understand that numerous conservation groups are advocating for definitions of old growth and mature in forests as young as 50-80 years old or based on arbitrary tree diameters. Western Oregon is comprised of fast growing forests that live and mature for centuries. The concept of calling 50 or 80 year old forests, or forests of a certain diameter as mature or old growth is laughable. As the Forest Service embarks on this effort you have to be sure to get it right. If you use the wrong definition proposed by some the results could be disastrous severely limiting forest health treatment and responsible, sustainable timber harvests.

Today timber supply from all sources is the number one threat facing Oregon's prized renewable material manufacturing facilities. Timber supplies from sustainable forest projects on federal lands are critical to Oregon's mills and are already severely limited. The results for our forests and communities have been devastating. In fact, in our region significantly more old growth forests have been lost to uncharacteristic stand replacing wildfire than any other cause. Many of these forests and habitats could have been saved by responsible forest treatments. Please make sure to keep this in mind as you set out on this inventory.

Finally, Swanson Group endorses the formal comments being submitted by the American Forest Resources Council.

Sincerely,

Steven D. Swanson
President, Swanson Group, Inc.