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First name: Steve

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Organization: Swanson Group, Inc.

Title:

Comments: RE: Comments of Swanson Group on the proposed Old-Growth Forest Rule #65356

My name is Steve Swanson and I am the President of Swanson Group, Inc. ("Swanson"). Swanson is an Oregon, family forest product's company. Founded in 1951, we operate 3 state of the art manufacturing facilities in Western Oregon. Swanson and the jobs of our 800+ employees are highly dependent on logs produced from National Forests in Western Oregon. While we rely on logs to run our manufacturing facilities and supply renewable long lasting wood products for the American consumer we also rely on our national forests to provide clean water, clean air and recreational opportunities. I am writing today to submit comments on the Forest Service's proposed Old-Growth forest proposal.

At its founding Swanson was a very small manufacturer almost wholly reliant on Federal timber to supply its large log processing operations. This being said, Swanson was an early innovator and with the pending slowdown of old growth logging operations on federal lands in the late 1980's and 1990's Swanson, through massive and continual capital expenditures transitioned its operations from old-growth timber to small and medium size second growth timber. In fact, almost all of the industry that remains in Western Oregon utilizes similar logs to Swanson.

This fact bares out when considering the Forest Service's Mature and Old Growth Inventory which found that harvest was a minimal threat to old growth forests. In fact, in Western Oregon, more than 70% of our national forests are already restricted from timber harvest in the name of old growth protection, all as a result of the Northwest Forest Plan. And the result of these set asides? We have watched, year after year, as the reserved acres, much of which is old growth, have been destroyed by wildfire, not timber harvest.

Plainly, setting aside large swathes of Federal land is a failed policy. Likewise, this new old growth proposal is a distraction from the real threats our forests face. Instead of drafting new rules for old-growth protection, the Forest Service should use record funding to double down on its forest health treatments. These treatments will fire proof old growth stands and produce needed wood products. These wood products produce jobs in rural America and store carbon for generations to come.

In conclusion, I believe, based on observations in our region, that a new old growth policy is not needed. Our current Western Oregon forest plans set aside over 70% of the available acres and we have watched while these reserved acres burn. The answer to our forest health crisis is more active management, not new rules and hurdles.

Sincerely,

Steven D. Swanson

President, Swanson Group, Inc.