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January XX, 2024

Director  
Ecosystem Management Coordination  
USDA Forest Service  
201 14<sup>th</sup> Street SW  
Mailstop 1108  
Washington, D.C. 20250-1124

Dear Director:

Great Lakes Timber Professionals Association (GLTPA) is a non-profit organization representing over 1,000 members and their 14,000 employees in Michigan and Wisconsin. Membership includes loggers, log truckers, foresters, landowners, sawmills, oriented strand board mills, pulp and paper mills, sportsmen and women, equipment sales/manufacturers, Menominee and Bad River Tribes, road commissions, WATCO and FOXY Rail lines, and school districts in both states. GLTPA members share a vested interest in sustainable forest resources as our mission is to "Protect a Multiple Use Forest for Future Generations." We take our mission very seriously and know that many of our members have been major players in helping make the forests of the Great Lakes Region some of the healthiest in the nation. The following comments are in response to Federal Register Notice No. 243 88042 – 88048 regarding Land Management Direction for Old Growth Forest Conditions Across the National Forest System.

We are concerned with this proposal to amend all land management plans in the National Forest system to include "*consistent direction to conserve and steward existing and recruit future old-growth forest conditions*". This proposed policy is certainly redundant, the management of old growth forest has already been included in each of the land management plans in National Forests in Michigan and Wisconsin and gone through public scrutiny. These National Forests are primarily second growth forests rebounding successfully from a previous era of poor management and large fires of the late 1800's and early 1900's. Only through hard work and implementation of sound, scientifically proven management efforts have these forests returned to the level they are today. Putting additional demands on the National Forest staff to amend these plans and insert/implement this unnecessary policy further reduces time for Forest Plan implementation and monitoring, for units that are already struggling to keep up with plan goals and objectives.



Greater emphasis on management targeted for old growth forests in the Great Lakes Region is unnecessary. The current Chequamegon-Nicolet Forest Plan, for example, has placed approximately 53% of lands suitable for timber production as either off limits to timber management (designated old growth, wilderness areas, wilderness study areas, Research Natural Areas, Special Management Areas or Wild and Scenic River corridors) or at significantly reduced levels to “promote old growth conditions” (interior northern hardwood management areas or riparian zones). Similar existing direction can be found in the Management Plans for the other National Forests in the Region.

Some of the ideals expressed for inclusion in the plan amendments are concerning and appear to be unsubstantiated. Old growth forests are defined as “*Healthy, climate-resilient old-growth forests*”. We take issue with this statement as it seems to counter other presented information and appears to be stated without clear evidence. In addition, preliminary information from the “*threat assessment*” directed under executive Order 14072 indicates the largest threats to old growth forests are fire, insects, and disease, not timber harvest. Common sense would lead one to believe focusing on the largest threats would be the best approach. There is no denying forest fires in recent years have released significant amounts of carbon into the atmosphere and have been a huge contributor to climate change. Forest fires have also contributed to a decrease in healthy air and a decline in human health. These facts have been substantiated through scientific studies. It is unclear to us how old growth forests “*reduce wildfire risks, enable subsistence and cultural uses, provide outdoor recreational opportunities and **promote sustainable local economic development.***” (emphasis added), as stated in the referenced press release. We feel this statement is completely unsubstantiated.

For far too long a large portion of our country has struggled with uniform national lands policy being developed around issues and conditions pertaining mainly to western states. Old growth forests will vary widely from region to region. Attempting to define and quantify them in a one-size-fits-all plan is an unnecessary and an insurmountable task best left to individual regions, communities, and forests.

Contrary to the rosy picture painted in the Federal Register Notice there are significant costs related to increasing management direction for old growth forest conditions. These include but are not limited to the following:

**FOREST HEALTH** – Defining all old growth forests as “*healthy*” and “*climate resilient*” is misleading. Any natural resource manager knows a diverse forest landscape is a healthy forest landscape. There is no one forest type that can be called “*healthy*” and “*climate resilient*” on its own merit. In addition, any natural resource professional knows all forest types are transitional and change over time. Even old growth forests will eventually die, and the carbon stored by them will be released. If “*storing large amounts of carbon*” is justification for increasing mature and old growth forests shouldn’t a goal of manufacturing more wood products such as furniture, lumber, and others where carbon will be stored more securely for an even longer period of time be considered as part of the solution for sequestration?

Diverse forest types and age classes are also important for our efforts to cope with insects and disease. There is a place for all forest types and successional stages across the landscape of our country. According to figures reviewed by our organization, there are already over 60 million acres of forest land set aside lands in the national forest system, and this is not an all-inclusive number. More than one-half of defined old growth stands are already in no- to low-management areas. As with all other forest types and age classes, there is a place for old growth. However, the question is how much more timber can be set aside before our ability to maintain a nation-wide diverse, healthy forest



system is hampered? Healthy forests provide clean water, clean air and a wide variety of forest products used by all members of society daily.

**WILDLIFE POPULATIONS** – We are unaware of any wildlife species in this Region that could be considered old growth obligate. While some species may benefit from more old growth conditions, others, including many young forest species some of whom are declining steadily, will be negatively impacted. Justifying more old growth conditions as this proposal suggests based on “*increasing biodiversity*” ignores that there are two sides to a coin and true biodiversity looks at all of them. There are many studies showing that species which require some old growth for a portion of their life cycle also rely on younger forests in close proximity to provide foraging and other habitat needs.

**ECONOMICS** - Imposing additional old growth designations will likely reduce direct and indirect economic returns to local communities resulting from forest management activities on National Forests. This will negatively impact employment in many rural communities affecting the livelihood of families in these areas. Decreases in revenue back to the local communities from Forest Service receipts (ie. 25% fund) can be expected with such designations. This funding is crucial for maintaining infrastructure and services.

Proper forest management requires having the ability to harvest timber as a tool available to managers. Continuing to add restrictions to timber harvesting places a heavy burden on individuals and companies trying to make a living from this work. Without workers to harvest timber and an infrastructure to support the industry, this management tool could soon be lost, as is evident in many western states.

The press release states the plan amendments would “*prohibit vegetation management within old-growth forest conditions when the primary purpose is to grow, tend, harvest, or regenerate trees for economic reasons.*” This is undeniably contrary to some of the language used to define old growth forests; “*promote sustainable local economic development*”. The State of Wisconsin recently invested \$600,000 in a Wisconsin Forest Practices Study. This study provided valuable research and conclusions regarding ways to improve and grow our state’s vital forest products industry. Combining direct, indirect, and induced effects, Wisconsin’s forest products industry is a \$ 37 billion dollar industry supporting 130,000 jobs. Increasing acreages of set aside on national forest lands will do nothing to “*promote sustainable local economic development*” in the Lake States Region. As previously stated, several organizations, local governments, and concerned citizens in Wisconsin and the other Great Lakes States have worked diligently to improve forest management on national forest lands. How will the “*collaboration with local stakeholders*” for old-growth forest conservation and management occur?

We also question the additional Forest Plan monitoring criteria being proposed in the Notice. While we support efforts to review previous management action and decisions, we see little evidence of Forests implementing adaptive methods even if conditions have changed. The Forest Service has a dismal record when it comes to Forest Plan monitoring. The 2012 Planning Rule, 36 CFR 219.12(d) requires the release of biennial monitoring evaluation reports on each Forest. Since Fiscal Year 2011, the Chequamegon-Nicolet National Forest has produced only one monitoring report (FY 2016 – 2017), providing no confidence that the Forest Service can implement additional monitoring responsibilities for any reason.



Thank you for the opportunity to comment of this Notice. We remain concerned that seeking a nationwide forest plan amendment for old growth forests is unnecessary and a significant waste of Forest Service staff and resources already stretched quite thin. Any type of old growth amendment should be done in coordinated manner at the Forest level with input from local staff, organizations, and individuals. Our organization offers to continue working with agency staff to continue to make the Lake States Forests some of the finest in the country.

Sincerely,

A handwritten signature in cursive script that reads "Troy Brown".

Troy Brown, GLTPA President

A handwritten signature in cursive script that reads "Henry Schienebeck".

Henry Schienebeck, GLTPA Executive Director