



January 30, 2024

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Director, Ecosystem Management Coordination
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Washington, DC 20250-1124

Tony Dixon
Regional Forester
626 East Wisconsin Avenue
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Jenn Youngblood
Forest Supervisor
Chequamegon-Nicolet National Forest
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Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356, amending all land management plans for units of the National Forest System to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions.

Dear Director Walker, Regional Forester Dixon, and Forest Supervisor Youngblood:

We support the Forest Service's effort to amend all Forest Plans in the National Forest System to conserve existing old-growth forest conditions and to manage for old-growth characteristics in certain mature forests.

For the Chequamegon-Nicolet National Forest we recommend that all stands greater than 120 years old be given protected status by adding them to Management Areas 8E, 8F or 8G.

Rational for Wisconsin:

- Statewide Forest Inventory & Analysis information gathered by Wisconsin DNR in cooperation with the Forest Service estimates that 1% of Wisconsin's forests are currently classified as old growth (120+ years old). This is also true for Wisconsin's Chequamegon-Nicolet National Forest (CNNF).
- In Wisconsin about 350 species of terrestrial vertebrates (birds, mammals, reptiles and amphibians) as well as over 1,400 species of terrestrial plants and thousands of invertebrate species require forests as habitat. All stages of forest development from

barrens and young forest through mature and old-growth forest, including forests with old-growth characteristics, are required to conserve the full array of these species.

- Published silvicultural and ecological literature document management techniques to develop old-growth characteristics in eastern mature forests including forest types on the CNNF.
- The best opportunities to recruit future old growth forests in Wisconsin exist in mature stands of natural origin white and red pine, hemlock hardwoods, northern hardwoods, and certain oak stands. These stands consist of long-lived tree species that can be managed well beyond economic rotation ages.

We agree with the July 23, 2023 assessment by the Forest Stewards Guild:

“Given the dramatically reduced extent of old growth forests, it is important to establish policies that protect old trees and old growth stands and encourage mature forests to grow old. Forest processes, such as wildfire and wind are essential (even in old growth forests) for long-term sustainability, regeneration, and resilience in the face of a changing climate. Active management may be required to protect old growth forests from uncharacteristic wildfires, invasive species, and other anthropogenic stressors.

Some mature forests can become old growth in the future and management can help foster and even accelerate the development of old forest characteristics in mature forests. In certain mature forests, active management, including active management for timber products, is desirable to prevent high intensity wildfire, optimize ecological benefits, and support forest-based economies.”

We can envision a conceptual framework that includes:

- Old growth forests that need little to no intervention for protection.
- Old growth forests that need management to survive.
- Mature forests that need little or no intervention to develop old forest characteristics.
- Mature forests that need management to develop old forest characteristics.
- Mature forests managed for other conditions (e.g., young forest conditions or timber).

The 2004 CNNF Forest Plan has a mechanism to locate and protect additional old growth and we encourage the Forest Service to build upon the Ecological Reference Area network used in the 2004 CNNF Forest Plan. This network includes Research Natural Areas (8E), Special Areas (8F) and Old Growth & Natural Feature Complexes (8G).

We recommend protecting all of the existing old growth on the CNNF (which is unfortunately a relatively small number of acres). We also encourage the CNNF to use a natural community-based field inventory to identify the existing old growth located outside the current Ecological Reference Area network. Use the existing Ecological Reference Area network plus newly inventoried old growth as a core to evaluate adjacent 80- to 120-year-old mature stands that could be managed to develop old-growth characteristics.

Wisconsin's Green Fire: Voices for Conservation is a science-based organization with foresters, wildlife biologists, and forest ecologists as members. We request being actively involved as the Forest Service moves forward with work to amend management plans to conserve and steward existing and recruit future old growth conditions.

Sincerely,



Meleesa Johnson (she/her)

Executive Director

Wisconsin's Green Fire: Voices for Conservation

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Wisconsin's Green Fire is a statewide organization dedicated to supporting our conservation legacy by promoting science-based management of natural resources. Our members include career natural resource professionals and scientists from a variety of disciplines throughout Wisconsin. For more information, visit <https://wfire.org/>.

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