

February 2, 2024

Linda Walker  
Acting Director  
Ecosystem Management Coordination  
U.S. Forest Service  
201 14<sup>th</sup> Street SW, Mailstop 1108,  
Washington, DC 20250-1124

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System; Federal Register Vol. 88, No. 243 88042-88048

Dear Acting Director Walker:

Michigan Farm Bureau appreciates the opportunity to comment on the U.S. Forest Service's Notice of Intent to prepare an Environmental Impact Statement to amend all land management plans for units of the National Forest System to impose additional restrictions on the management of old-growth forests. MFB is the state's largest general farm organization, representing over 40,000 farming families including many directly involved in the forestry sector. Michigan is home to 19.3 million acres of forest land, covering 53 percent of the State, with 18.6 million considered timberland. Michigan is fifth largest in the U.S. for timberland acreage. The economic benefits are valued at \$12 billion and support 200,000 jobs through forest-based industries and tourism/recreation.<sup>1</sup> Michigan is home to the Ottawa, Huron-Manistee, and the Hiawatha National Forests.

We are very concerned about the Forest Service's proposal to amend 128 land management plans in 12 months and urge the Forest Service to instead address old growth and mature forest conditions at the local level and with public participation, including that of our members who engage in public lands timber harvesting and grazing, as well as manage adjacent farm, range, and forest lands. It is imperative that our members understand, at a forest level, what is deemed old-growth forest and what activities may or may not be considered compatible in these areas and areas of "connectivity of old-growth forest conditions." This kind of on-the-ground conversation can only be accomplished through the individual forest land management plan amendment process.

According to the Federal Register notice, "current data has identified approximately 2,700 land management plan components, across nearly all 128 individual plans, which provide direction on the management, conservation, or monitoring of old growth forest conditions across the National Forest System."<sup>2</sup> This data, outlining extensive existing provisions for old-growth forest management and conservation across the National Forest System, leads us to question whether there is a true need for change. Additionally, the Forest Service

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<sup>1</sup><https://www.michigan.gov>

<sup>2</sup> Federal Register, Vol. 88, No. 243, page 88044

notes that “the structure and composition of old-growth forests is highly place-based and can range from old, multi-layered temperate coniferous forests with high amounts of dead wood in the form of standing snags and coarse wood to old, single-storied pine forests or oak woodlands with open canopy structure and fire maintained herb and litter dominated understories.”<sup>3</sup> It is contradictory to mandate a national standard for old growth forest management while at the same time acknowledging the unique nature of different types of forests across the country.

We are also concerned about the impact this effort could have on other priorities of the Forest Service, primarily reducing fuel loads on the Forest System and protecting surrounding communities. Chief Moore has testified that “the Forest Service’s paramount focus continues to be combatting the threat and impact of destructive wildfire to our nation’s communities, critical infrastructure, forests, rangelands, water supplies, and wildlife.”<sup>4</sup> Two years ago, the Forest Service rightly announced efforts to dramatically increase fuels and forest health treatments across the West.<sup>5</sup> One year ago, the Forest Service added 11 landscapes to the effort.<sup>6</sup> This important and significant undertaking should remain the Forest Service’s priority. Staff working on National Environmental Policy Act documents and other issues to support fuels reduction projects should be focused on that program, not encumbered with an additional task. The Forest Service’s own documentation regarding threats to old-growth forests includes wildfire, and therefore the priority should remain on appropriate forest management to reduce wildfire.<sup>7</sup>

The Forest Service has been given multiple use and sustained yield objectives by Congress, and this proposal is elevating one component of forest management over others on a national scale. The Federal Register notice articulates that the purpose of this amendment is “to establish consistent plan direction to foster ecologically appropriate management across the National Forest System...within the context of the National Forest System’s multiple-use mandate.”<sup>8</sup> It is unclear how this will be accomplished without additional alternatives and specifics being made publicly available during the NEPA process. The Forest Service includes as a Desired Condition “connectivity of old-growth forest conditions,”<sup>9</sup> which could mean that non-old-growth areas become cordoned off from multiple uses such as timber harvest or even grazing. Guideline 1 further expands on seven “priorities and purposes,” all of which seemingly could expand the geographic restrictions on multiple use located near old-growth areas.<sup>10</sup> Information about the preliminary proposed action is too vague and high level to appropriately analyze the environmental impact of the proposed action, including the increased risk of fire and disease in untreated areas of the Forest System.

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<sup>3</sup> Federal Register, Vol. 88, No. 243, page 88046

<sup>4</sup> Statement of Randy Moore, Chief of the USDA Forest Service Before the United States Senate Committee on Energy and Natural Resources Concerning President’s Fiscal Year 2024 Proposed Budget For the USDA Forest Service, April 18, 2023; also Statement of Randy Moore, Chief of the USDA Forest Service Before the Senate Committee on Appropriations, Subcommittee on Interior, Environment and Related Agencies Concerning President’s Fiscal Year 2024 Proposed Budget For the USDA Forest Service, March 22, 2023

<sup>5</sup> Confronting the Wildfire Crisis,

[https://www.fs.usda.gov/sites/default/files/fs\\_media/fs\\_document/Confronting-the-Wildfire-Crisis.pdf](https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/Confronting-the-Wildfire-Crisis.pdf)

<sup>6</sup> <https://www.fs.usda.gov/managing-land/wildfire-crisis>

<sup>7</sup> <https://www.fs.usda.gov/sites/default/files/mature-old-growth-forests-initiative-threat-analysis.pdf>;

Federal Register, Vol. 88, No. 243, page 88043

<sup>8</sup> Federal Register, Vol. 88, No. 243, page 88044-5

<sup>9</sup> Federal Register, Vol. 88, No. 243, page 88047

<sup>10</sup> Ibid.

Michigan Farm Bureau encourages the Forest Service to continue its long-standing practice of amending land management plans on a local and forest-based scale. MFB also encourages the Forest Service to continue its focus on the wildfire crisis in our country. According to the Congressional Research Service, “since 2000, an annual average of 70,025 wildfires have burned an annual average of 7.0 million acres...From 2013 to 2022, there were an average of 61,410 wildfires annually and an average of 7.2 million acres impacted annually. In 2022, 68,988 wildfires burned 7.6 million acres.”<sup>11</sup> These burned acres devastate the same kinds of forest conditions the Forest Service is trying to protect, negatively impact air quality both locally and across the country, and harm local communities that rely on multiple uses of the forests.

Michigan Farm Bureau appreciates the opportunity to comment on this critical issue and would welcome the opportunity to discuss it in more detail.

Sincerely,

A handwritten signature in black ink that reads "Craig Knudson". The signature is written in a cursive style and is positioned to the left of a light blue rectangular stamp.

Craig Knudson  
Forestry Specialist

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<sup>11</sup> Congressional Research Service, Wildfire Statistics, June 1, 2023  
<https://crsreports.congress.gov/product/pdf/IF/IF10244>