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Director, Ecosystem Management Coordination  
USDA Forest Service  
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September 16, 2024

Dear Director:

Great Lakes Timber Professionals Association (GLTPA), a non-profit, two state organization representing over 1,000 members and their 14,000 employees in Michigan and Wisconsin, appreciates the opportunity to provide comments to the Draft Environmental Impact Statement (DEIS) for the **Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System**.

Our thorough review of this extensive document sees little to justify the direction to amend National Forest Land Management Plans to address old-growth forests at this time across the entire National Forest system. As such we recommend the selection of the No Action Alternative (Alternative 1) allowing each Forest to address old-growth forest issues during upcoming Plan revisions.

We find it a bit confusing that, as stated on page S -4 in the Forest Service's Threat Analysis "*that mortality from wildfires is currently the leading threat to mature and old-growth forests, followed by insects and disease*". The analysis also found that "*tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects, and disease*". Yet despite being a "*minor threat*" the impact of timber harvests on old growth forests was listed as two of the three concerns/issues that drove alternative development.

We are concerned that no cost analysis to implement any of the alternatives was included in the DEIS. This should be a major decision factor especially for an agency (and administration) that has repeatedly touted a shortage of staff and funding to implement existing Forest Plans. Even the cost to prepare this DEIS would be staggering (but is not openly expressed). The Interdisciplinary Team for this DEIS consisted of 76 Forest Service staff (the majority with many years of experience and most likely above average salary levels) and 7 outside contractors. Now expand that to incorporate this on 120 National Forests outside of scheduled Forest Plan revisions. The vast majority of National Forest Plans have already included old growth analysis and designation during development of their current Plans. Clearly the time and \$50 million in funding set aside by the Executive Order could be better used to implement Forest Plans far behind Plan goals in this Region, and we suspect, across the country.

Greater emphasis on management targeted for old growth forests in the Great Lakes Region is unnecessary at this time. 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).

There would be greater justification to amend Forest Plans to address the continued decline in early seral forests occurring across the entire National Forest system. This is resulting in significant declines in wildlife species that utilize these habitats for some or all of their needs. Unlike mature and old growth forests that are actually increasing on National Forests, early seral forests are being lost at ever increasing rates as management is restricted or significantly delayed on public and private lands.

Also of concern is the unsubstantiated determination that ***“the old-growth amendment is unlikely to have major effects on timber supplied from the National Forest System, no effects are expected on traditional timber industry jobs in logging, wood product manufacturing, and pulp production”*** (Page S-14). To the contrary, policy changes from any of the action alternatives in this amendment will most likely lead to detrimental cumulative impacts to local economies. We are not aware of any Forest in the country that has met current Forest Plan goals for timber harvest and have consistently heard the excuse of the agency not having enough staff or funding. Forcing 120 National Forests to amend individual Forest Plans to address additional old growth issues take up considerable staff time and funding diverting staff from Plan implementation, therefore, delaying important management activities. In addition, we note a reference that current ***“project areas characterized by old-growth forest may need a survey for old-growth”*** (Page 121-122) adding to potential costs and delays. We have no doubt delaying harvests even further through the policy guidance in this amendment can and will impact local economies as well as forest sustainability.

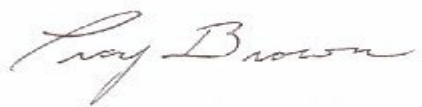
To justify a determination of no effects the DEIS goes on to state ***“Forest industry in the U.S. shifted away from old-growth logging and milling in the 1990s in all U.S. regions other than Alaska.”*** (Page S-14). While we admit there has been a decline, especially in the West, of large tree logging and mills to handle this wood, we see a different story in the Eastern part of the country. Second growth forests are maturing, most with the assistance of scientifically based forest management activities, increasing the size and number of large logs available. In Wisconsin alone, 31 sawmills and veneer mills rely on the availability of large logs for their operations. Many have been in operation for decades with some being the primary business in their local communities, including at least 15 in close proximity of the Chequamegon/Nicolet National Forest. Any potential reduction in reliable timber sources in their area can have negative impacts to these local businesses, economies and livelihoods of citizens of the area.

Wisconsin’s forest products industry is a \$ 37 billion dollar industry supporting 130,000 jobs. Any potential increase in acreage of set aside on national forest lands will do nothing to ***“promote sustainable local economic development”*** in the Lake States Region.

While we do agree with the premise that older forests/trees store large amounts of carbon over long time periods (page 59) we do have a concern with the inference that old-growth forest ecosystems are carbon stable. Old growth forests by designation include significant levels of dead and dying trees, periodically releasing stored carbon back into the atmosphere while sequestering much less carbon than younger forests. Old-growth forests, like all forests, are dynamic and impacted, as noted elsewhere in this document by wildfire, winds, insects and diseases as well as other factors. 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 carbon concerns?

Thank you for the opportunity to comment on this DEIS. GLTPA membership includes loggers, log truckers, foresters, landowners, sawmills, oriented strand board mills, pulp and paper mills, sportsmen and women, equipment sales/manufacturers, and school districts throughout Michigan and Wisconsin. They share a vested interest in forest resources as our mission is to “Enhancing 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. 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.

Sincerely,

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

Troy Brown, President

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

Henry Schienebeck, Executive Director