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Comments: Appointed by the Governor, the Wisconsin Council on Forestry is a diverse group of forestry community leaders who support Wisconsin's efforts to achieve sustainable forestry. We are taking this opportunity to comment in response to Federal Register Notice No. 243 88042 - 88048 regarding Land Management Direction for Old Growth Forest Conditions Across the National Forest System to emphasize the need for local adaptation.

The Chequamegon-Nicolet National Forest is a critical and valued partner of the Wisconsin forestry community covering more than 1.5 million acres of Wisconsin's northern forestlands. Managed for multiple uses including wildlife habitat, recreation, forest products, fisheries, wilderness and natural areas, these lands are essential to our state's economy and the prosperity of our northern rural communities as well as the overall health and well-being of our residents and visitors to our state.

Our northern forestlands are comprised of primarily second growth forests that have rebounded from extensive cutting, and subsequent fires, in the late 1800s and early 1900s. Following this era, active sustainable forest planning and management has allowed our forests to recover and now are on a trajectory to be vigorous, resilient, and able to provide all the amenities of a multi-use public forest. Timber harvests are a crucial tool used by our local foresters to achieve these results.

The Council is concerned that a one-size-fits-all approach to managing the National Forests, could ignore the important local-level social, economic and ecologic nuances that forests have in each state. For example, an increase in a hands-off tactic to managing our local national forest lands could jeopardize our state's forest industry, our local economies, and our ability to maintain vigorous, resilient forest ecosystems in light of threats from insects, diseases, altered wildfire dynamics, and shifts in temperature and precipitation patterns.

The Council recognizes the ecosystem value of a diverse forest including a variety of upland and lowland cover, and forest and habitat types, including both young and old forests. We believe that the unique characteristics of mature and older forests that contribute to this diversity can be achieved through active management as well as passive management. The concept that any natural ecosystem can be preserved as a snapshot in time ignores the understanding that all living things, including forests, change and evolve.

The concept of the role that active management can be consistent with objectives to promote old-growth forest characteristics is understood here in Wisconsin. The Wisconsin Department of Natural Resources is studying this through their Managed Old Growth Silvicultural Study on state and national forest lands. The overall objective of this study is to investigate refinements to forest management techniques to use active forest management to restore structural and compositional complexity in second-growth forests while also allowing for ecologically sustainable timber product outputs.

For over 100 years, our Wisconsin forestry community has worked diligently to nurture our forest ecosystems to be what we have today: diverse and resilient forests that provide clean air and water, recreational opportunities, wildlife habitat, and forest products that support our \$37 billion dollar forest industry that is critical to our rural communities. We are concerned that seeking a nationwide forest plan amendment for old growth forests will be a significant burden on federal staff and resources already stretched quite thin. The Notice of Intent did not sufficiently clarify the balance of national consistency and local adaptation in plan amendments. We hope to see further clarification in the draft Environmental Impact Statement with an emphasis on adaptive capacity for local conditions. We value the relationship we have with our local national forest team and want to stress that any type of old growth plan amendment should be done with coordination at the Forest level with input from local staff, organizations, and individuals.

Attachment: WI CoF USDA Old-Growth Comments Final.pdf - is letter text above.