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Comments: Dear Director:

Thank you for the opportunity to comment on the notice of intent to prepare an environmental impact statement for mature and old-growth forests across the National Forest system. I am sharing these comments on behalf of the Wisconsin Department of Natural Resources, Division of Forestry. Please note that we are interested in participating as a cooperating agency.

The 1.5-million-acre Chequamegon-Nicolet National Forest (CNNF) is a significant and important part of Wisconsin's forested land base. The WDNR is also a close partner with CNNF on forest management issues, forming the first Good Neighbor Authority (GNA) Agreement in the nation. We are pleased that the Forest Service is taking steps to proactively manage for mature and old-growth forests, and we wish to support that effort and ensure the ecological, economic, and social vitality of these forestlands. Based on the current notice of intent, we wish to offer these preliminary comments to help inform the process.

1. Wisconsin's forests are primarily middle-aged and second-growth, with 11% of our acreage 20 years old or less and only 7% greater than 100 years old. Moving forward it will be important to manage for a balanced age-class distribution of both young and old forest to maintain diversity and resilience across the landscape, as well as providing continued support to forest products industries.

2. Given the preponderance second-growth forests, it will be critical to allow a diverse spectrum of vegetation management treatments and intensities that enhance mature and old-growth characteristics in both even-aged and uneven-aged systems. This includes various levels of retention that mimic natural disturbance models found in this landscape. We have found through Wisconsin's Managed Old-Growth Silvicultural Study (MOSS) that there are a number of silvicultural techniques that can be used to accelerate the development of structural and compositional complexity, in an effective and economic manner. The proposed Standard 2a will help realize the benefits of this proactive stewardship of mature and old-growth forests.

3. We are unsure how Standard 1 will be interpreted. Do early successional forest management treatments "impair the composition, structure, and ecological processes?" Again, a broad silvicultural toolbox must be maintained so that managers can mimic natural disturbance patterns and provide a balanced approach to forest management. Some clarification of this Standard may be warranted.

We look forward to working with our partners at CNNF and all stakeholders in the National Forest system as we develop better ways to maintain the diversity and resilience of our forests. Thank you for the opportunity to comment on this issue. We would be happy to answer any additional questions or provide additional information, if requested.

Sincerely,

Greg Edge

Forest Ecologist / Silviculturist

Wisconsin Department of Natural Resources, Division of Forestry