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Organization: Michigan Association of Timbermen

Title: Executive Director

Comments: I am writing on behalf of the Michigan Association of Timbermen to express our concerns about the proposed amendment for Old-Growth Forest Conditions Across the National Forest System. While recognizing the importance of ecologically appropriate management, we believe that certain aspects of the amendment may negatively impact Michigan's timber industry, as well as the health of our forests.

First, we are of course concerned about the economic impact of this effort on Michigan's timber industry. Any restrictions, loss of formerly managed acreage, or other inefficiencies created as a result of the old-growth forest amendment will have a negative impact that could lead to job losses and economic downturns in regions dependent on forestry-related activities.

Second, I have concerns about the national scale and uniformity of the proposed amendment. Forest ecosystems vary significantly across regions, and a one-size-fits-all approach m not adequately address the diverse challenges and opportunities present in different landscapes. Many of Michigan's tree species have comparatively short lifespans, and a simple wind event can lay waste to an old-growth forest that is in the process of dying. Sustainable harvesting and management leads to healthier, larger, and older trees.

Third, there seems to have been limited input from and collaboration with those in the timber industry. The exclusion of industry expertise can result in impractical or ineffective strategies that fail to balance conservation goals with economic considerations.

Thank you for your attention.

Sincerely,

Justin Knepper