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Comments: Thank you for the opportunity to comment on the Amendments to Land Management Plans to Address Old-growth Forests Across the National Forest System - Draft Environmental Impact Statement. I am sharing these comments on behalf of the Wisconsin Department of Natural Resources, Division of Forestry.

Management Approach 1.a vi.

Are "transition" approaches consistent with other goals of this amendment? Transition may entail more drastic changes in vegetation composition, that may not be consistent with conserving native old-growth. Suggest changing to more general wording, such as "Engage in appropriate climate adaptation approaches."

Management Approach 1.a viii.

Expand on this point to also recognize the role of natural disturbance patterns and landscape level heterogeneity.

Management Approach 1.b

Wisconsin's CNNF contains a significant proportion of "mature" forest that developed after the cutover of the last century. It will be critical to set clear expectations in this approach to avoid potential litigation of the decisions on what acres/areas to manage for future old-growth. Suggest clarifying the intent is not to manage all acres of mature forest for potential future old-growth, but rather the Adaptive Strategy should target key areas that provide additionality, such as connective corridors, climate refugia, critical watersheds, areas with limited OG, etc. For example, one could argue that all northern hardwood forests have the "inherent capability" to become old-growth given enough time. If the intent is to not move all these acres towards old-growth, but rather give managers the flexibility to make decisions that make sense locally, this intent needs to be more clearly articulated.

Desired Condition 2

Unclear what "inherent capability" means. Does this refer to site capability to grow old trees and develop structure? Add definition and clarity to this statement.

Objective 4

A DFC for old-growth forest first needs to be established to determine if an

"increasing trend" is appropriate in the plan area. Also recognize in objective that factors outside the control of managers (e.g., fire, windstorms, climate change) may impact trends.

Standard 2a.

Add the qualifier "appropriate for the forest type" to sections v., vi., and vii. to recognize these attributes vary by forest ecosystem and disturbance regime.

Standard 3

Add qualifier "sole purpose of timber production" to still allow for commercial practices that meet the intent of proactive stewardship.

Guideline 3

Legacy tree definitions like this are very subjective and a potential litigation risk. If this guideline is kept, recommend adding language that better assists the forest manager in determining what trees to retain. For example, define "old trees" to include individual trees that are typically past rotation age, may represent a remnant from a previous stand, and provide unique functional, structural, and cultural benefits. Recognize in the guideline that legacy trees may not be present in all stands and that decisions on what trees meet these criteria are somewhat subjective and based on professional judgement.