



June 6, 2019

Fred Souba, Wisconsin State Forester
WDNR Rhinelander Service Center
107 Sutliff Avenue
Rhinelander, WI 54501

Dear Fred,

On behalf of Wisconsin's Green Fire and our members I want to thank you for the opportunity to serve as an operational partner for the Wisconsin Forest Action Plan and to offer comments on the May 2019 Wisconsin Forest Action Plan – Draft Assessment. I've attached the Forest Action Plan Draft Assessment with our comments and suggested edits throughout. These comments reflect the input of our professional members involved with our Forestry and Public Lands Work Group.

We recognize that producing a statewide forest assessment that covers such a wide range of issues is challenging, and there is a wealth of valuable information and insights on Wisconsin forests throughout the document. Despite the good start, there are important considerations that we believe need to be better addressed in this assessment, and other issues for which the limited information provided may lead to incorrect interpretations or inappropriate selection of strategies. We believe it is important to address these issues in a revision for public comment. To complement the specific comments and suggested edits we've included in the draft document, I have listed our highest priority concerns below:

- *Sections on forest conservation and bio-diversity are incomplete and not sufficiently developed.* This gap misses the tremendous conservation value of Wisconsin's forests in supporting species and ecosystem diversity, as well as clean water and clean air. Previous forest statewide assessments have covered this ground more fully and have made the connections between forests and related natural communities and protected areas. We make specific recommendations on this in comments, including suggestions that more information be provided about forests' role in providing habitat for the large number of breeding songbirds, as well as large mammals including deer, elk, bobcat, and wolves. Forest bio-diversity is certainly not limited to these species, however they are the focus for many Wisconsin residents and visitors who use our forests and should be recognized.
- *Assessments of the condition and quality of forest types uses too few metrics and are incomplete.* The species level information derived from FIA is important, but it also lumps multiple forest and habitat types in a way that can mask important factors. Some forest types, including oak forests, hemlock hardwood forests, as well as less common types like paper birch and cedar, face critical challenges to sustainability that could be brought out by focused quantitative assessment of their condition and trajectory.

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- *The collective impacts of invasive species, white-tailed deer, and harvest patterns that increase simplification of forest structure and composition should be better emphasized.* These are well-documented trends that affect forest sustainability for all values and are arguably some of the greatest long-term threat to productivity and sustainability. There is a significant amount of research on this topics that could be referenced to help identify priority issues and help support effective strategies.
- *The assessment focuses extensively on the accumulation of older forests and older trees and their associated risks without sufficiently providing context for the current conditions or highlighting the many benefits associated with more mature forests.* In at least one section old forests and old trees are described interchangeably, which is inaccurate and can be confusing. A significant portion of age-class increase is shown to be in forests from 61-80 years old. In healthy forests with long-lived species this age class is rarely considered high-risk, and from an ecological standpoint, forests at this age are typically still in an intermediate stage. The assessment also mentions, but does not analyze, the growing extent of forests managed for multiple age classes which may have older trees but also contain many younger cohorts. We suggest the assessment be revised to reflect enough of our state's history of forest exploitation and recovery to understand the success story of Wisconsin forest management, as well as the economic and ecological benefits of older forests and larger trees when managed properly.
- *In many southern forests especially, the cost of managing invasive species and high deer numbers outweighs potential future returns from forest management.* Without subsidized investments in remedial management, the sustainability of the forest resource in a growing number of mostly smaller private ownerships is in question. Especially throughout southeastern Wisconsin counties, many forest acres are falling into an un-stocked condition as invasive shrubs and non-commercial species capture forest understories while the oak or other hardwood overstories are harvested or lost to mortality. The significance of this threat to forest management and our current forestry programs should be stressed.
- *Current and developing markets for forest carbon offsets are becoming an important revenue stream for larger private landowners.* We are glad to see the assessment address the carbon storage function of forests, however the potential associated benefits of forests as carbon sinks and potential revenue sources from forest carbon markets should be more fully developed. Strategies to extend carbon credit market access to smaller private owners and public lands is an opportunity for forest owners for which new policy strategies should be evaluated. The role of forests in offsetting greenhouse gas emissions needs to be better understood by policy makers and the public.

- *Managing forests to increase resiliency to climate-related impacts will be increasing in priority for managers.* The sections on forest pests, and on catastrophic events and climate change identify ongoing and emerging threats to forest resources. Evidence suggests that changing climate conditions (both conditions we have already experienced and predicted future conditions) may increase the severity of insect and disease outbreaks and will make management more difficult and outcomes less unpredictable. Your assessment references the Wisconsin Initiative on Climate Change Impacts – Forestry Working group. The [2011 report](#) from the [WICCI Forestry Working Group](#), which Division of Forestry Staff have contributed to, provides a significant level of detail, including strategy recommendations that should be included in this assessment. This assessment makes these points, however we emphasize the importance of considering these projections and uncertainties in detail when weighing goals and strategies around adaptive forest management future forest composition.
- On an issue directly related to climate change, *we suggest emphasizing the economic and operational impacts of winter logging seasons which are becoming increasingly shorter* – in some cases as much as three weeks shorter than they were as recently as the 1970s. This assessment notes that trend and future predictions that it will continue. We recognize there is always variability and uncertainty around future predictions, however If this trend continues it could force dramatic shifts in forest operations that would impact forest sustainability and add to forestry sector employment and economic challenges.

The Statewide Forest Assessment contains very useful information. However if it is going to be the primary reference for selecting strategies for our Statewide Forest Action Plan then we believe addressing these gaps will be critical to a successful process. I and other members of Wisconsin's Green Fire are ready to collaborate wherever you believe it would be helpful to help address the issues we have raised here. We look forward to participating in completing this assessment, and in working with the forestry community in selecting strategies and preparing the Forest Action Plan later this year.

Thanks for your leadership in managing one of our state's greatest resources.

Sincerely,



Fred Clark
Executive Director