

**Center for Biological Diversity \* Clean Wisconsin  
Environmental Law & Policy Center \* Midwest Environmental Advocates  
Sierra Club – Wisconsin Chapter**

August 31, 2021

Chief Randy Moore  
United States Forest Service  
1400 Independence Ave SW  
Washington, D.C.

Re: Request to Suspend and Review Trump Administration’s Fourmile Vegetation Management Project

Dear Chief Moore:

Pursuant to several Executive Orders issued by President Biden, we request that the US Forest Service take immediate steps to suspend and review the Fourmile Vegetation Management Project in the Chequamegon-Nicolet National Forest in northern Wisconsin.

This request is fully in keeping with the President’s January 20, 2021 Executive Order 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, requiring the heads of all agencies to “immediately review all existing regulations, orders, guidance documents, policies or any other similar agency actions (agency actions) promulgated, issued, or adopted between January 20, 2017 and January 20, 2021.” The President’s January 27<sup>th</sup> Executive Order, 14008, *Tackling the Climate Crisis at Home and Abroad*, provided that we must “listen to science” and act to confront the climate crisis and protect biodiversity.

### ***Fourmile Meets the President’s Chronological Criteria for Review***

The Fourmile logging project is an agency action that meets the criteria for review in Executive Order 13990: “actions during the last 4 years that conflict with these important national objectives, and to immediately commence work to confront the climate crisis.” Fourmile was developed entirely under Trump Administration policies to rapidly increase logging, by 72% in 5 years, with restricted environmental review and no requirement for analysis of greenhouse gas effects.

Consider the chronology of key actions, all during the prior four years:

- **May 30, 2019.** USFS issues the Fourmile Draft Environmental Assessment, claiming without analysis that the project would not create a “net increase in greenhouse gas emissions.”
- **March 23, 2020.** USFS issues “Draft Decision Notice and Finding of No Significant Impact” (FONSI). The USFS does not address climate, with one exception which claims no responsibility to analyze effects, citing Executive Order 13783.
- **May 13, 2020.** ELPC files a Notice of Objection to the Draft FONSI, citing scientific controversy based on a pattern of the USFS using inadequate methods and outdated science.
- **September 23, 2020.** USFS rejects the ELPC et al. objection to the draft FONSI.

- **November 13, 2020.** USFS issues final decision and FONSI on the Fourmile logging project.

Without action to suspend and review Fourmile, the Biden Forest Service may implement timber sales developed under Trump forest policies.

### ***Fourmile Conflicts with National Objectives on the Climate Crisis***

Fourmile was created under Trump Administration policies that did not consider climate change impacts. If allowed to stand, the Fourmile decision will allow timber cutting with harmful climate effects for many years to come. The 55,000-acre project calls for 12,000 acres of logging and over 1,000 acres of clearcutting. Consistent with the President’s executive orders, USFS should reconsider the Fourmile project with the best available science to consider climate, habitat and other ecological and public health consequences via a full Environmental Impact Study (EIS).

Northern temperate forests like the Chequamegon-Nicolet National Forest are critical carbon sinks and reservoirs. Remaining mature and older-growth tree stands maximize carbon sequestration and storage and should be protected to avoid increased carbon pollution. But the Fourmile Project would cut many of those stands.

#### **Fourmile Project**

##### **Stands by Management Area, Decade of origin**

<b>Decade of Origin</b>	<b>Number of Stands</b>	<b>Total Acres</b>
Undetermined	57	1,714
1860	2	61
1870	1	4
1880	4	141
1890	15	221
1900	33	758
1910	29	958
1920	66	1,697
1930	89	2,520
1940	67	1,300
1950	23	304
1960	32	462
1970	47	874
1980	35	599
1990	5	84
<b>Grand Total</b>	<b>505</b>	<b>11,700</b>

The USFS failed to heed the best available climate change science in assessing and planning Fourmile, and even ignored their own research. In 2014 the USFS Northern Research Station, based in Wisconsin, released the authoritative and fully reviewed General Technical Report titled *Past and prospective carbon stocks in forests of northern Wisconsin: a report from the Chequamegon-Nicolet National Forest Climate Change Response Framework* (Birdsey et al. 2014). USFS staff and others have published clear findings on climate change impacts that contradict USFS claims that the proposed logging in

Fourmile is “not expected to result in a net increase in greenhouse gas emissions.” As the Birdsey report found:

- “Likely causes for the declining sequestration rate are continuing high rates of harvesting for wood products, which result in large areas of forest recovering from intensive disturbance”
- “For all forest types in northern Wisconsin, there is potential to increase (carbon) stocking by allowing more of the forest area to reach older age classes.”
- “Increasing the interval between harvests . . . can increase overall carbon storage. The no-management scenario had significantly higher mean carbon stocks than all other scenarios.”

While the USFS mentioned the Birdsey et al. study when they briefly discussed climate change in the environmental assessment, they ignored that report’s important findings on reduced carbon sequestration due to logging practices. The Birdsey study reflected other scientific findings in the forestry field that mature stands of trees sequester and store the most carbon<sup>1</sup>.

The USFS made their opposition to considering climate impacts very plain in their response to Fourmile public comments. In “Appendix C 30 Day Comments and Responses,” the USFS cites Executive Order 13783, issued **March 28, 2017**, as the reason they are not “required to address the effects of individual projects on climate change, such as a logging sale.” (p. 101)

The USFS comment response ignored 12 years of climate science developed prior to 2020. The latest forest climate study they cite was from 2009. The USFS cited the *Fourth* Assessment Report from the Intergovernmental Panel on Climate Change (IPCC), issued in 2007, but not the (then) more current *Fifth* Assessment Report from the IPCC issued in 2014. Climate and forest management has been the subject of much scientific investigation since 2009. It’s clear that the USFS did not use the most current and accurate scientific findings in their assessment.

### ***Fourmile Conflicts with National Objectives in Executive Orders***

Fourmile conflicts with other national objectives prioritized by President Biden in his January 27<sup>th</sup> Executive Order. The Fourmile logging project will reduce biodiversity, such as by harming populations of wood turtle and American pine marten. Creating large clearcuts will increase populations of deer that harm plant diversity by harming regeneration of forest tree species (northern white cedar, eastern hemlock, yellow birch, white pine, and northern red oak) and understory plant diversity. Harmful impacts on water resources from clearcutting, such as increased snowmelt and storm flow peaks, have been scientifically confirmed and appear likely to occur if the Fourmile project continues.

In his orders, President Biden addresses the impact of our actions on foreign relations. Importantly, how the U.S. manages public forests affects foreign policy related to climate change. To persuade other nations to reform forest stewardship practices, the U.S. should lead by example. Reversing Fourmile would also support the president’s 30x30 initiative to conserve 30% of public lands by 2030.

### ***Conclusion***

In conclusion, the Fourmile project meets criteria in the Biden executive orders for suspension and review based on the dates of key agency actions, actions on other Trump administration policies,

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<sup>1</sup> Moomaw W.R, et al. 2019. [Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good.](#) *Frontiers in Forests and Global Change.*

failure to “listen to the science,” and the significant harm to public objectives such as climate change, human health, biodiversity and foreign policy.

Confronting the climate crisis requires confronting and changing injurious forest management practices. We, the undersigned groups, call on the USFS to act promptly to suspend and fully review the Fourmile project, including undertaking an EIS and consideration of climate change, biodiversity and public health. The Forest Service should protect remaining mature and older growth stands.

We would greatly appreciate meeting with you or your staff as soon as possible to discuss in more detail. To follow up you may contact Andy Olsen, ELPC Senior Policy Advocate at 608-334-1456 or [AOLsen@elpc.org](mailto:AOLsen@elpc.org).

Signed,

Andy Olsen, Senior Policy Advocate  
Environmental Law & Policy Center

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