



*Porcupine Mountains State Park; Photo Credit: Linda Sarmento*

# 2024 Michigan Forest Management Plan

## Background

On September 5 the Michigan Department of Natural Resources (DNR) released the 2024 State Forest Management Plan for public review. The management plan, renewed every 10 years, is intended to provide the long-term framework by which the DNR will ensure sustainable management of state forest lands for the duration of the plan period. Unlike previous 10-year plans, the 2024 draft combines data and strategic direction from regional forest plans into a single, comprehensive document.

At the time of release, the DNR offered 30 days for public review and three public hearings, all taking place less than a week later. However, following significant public pressure in response to the brief period to review the more than 1700-page plan, the DNR revised the public review period to remain open until December 31, 2024. Despite initial consternation related to the brief public comment period, the DNR has taken action to help restore transparency and public confidence in the process by offering an appropriate opportunity for in depth public review. The following notes identify observations related to key National Wildlife Federation (NWF) priorities aligned with the Great Northwoods Initiative.

## General Strengths

- » **Anticipating the impacts of climate change.** As recently as 2022, the DNR failed to address climate change in its forest action plans. The integration of relevant climate change data and associated impacts for each management priority within the plan demonstrates growth in the DNR's approach to the scientific management of Michigan forest lands.
- » **Consolidating and clear organizing of Michigan forest management strategies.** The DNR is responsible for managing a wide array of forest lands and associated land uses. For the first time, the 2024 plan provides a comprehensive view of all current forest management priorities in a format that is easily accessible for non-expert review. Specifically, the plan is organized in a manner that allows a reader to identify the management

priorities, outcome goals, and climate impacts for each discrete management responsibility that can be understood without needing to review the entire plan.

## NWF Priority Aligned Content Observations

### Biodiversity and rare habitats

- » The overarching principle of section 3.2 “Biological Diversity” is “The state forest is managed to conserve or enhance biological diversity.” Management priorities include the Conservation Area Network, rare species, and tree taxonomic diversity. Of these, only tree taxonomic diversity includes any metrics of biodiversity in its objectives.
- » This section focuses on conserving and enhancing ecosystem diversity, referring to diverse habitat types, such as mature forest, nonforested openings, and vernal pools, as management priorities, suggesting that the DNR is interested in maintaining a variety of forest types for the benefit of wildlife, including several specific bird, mammal, and insect species named in the plan.
- » The section on the Conservation Area Network identifies the desired future state of the Network as it comprises 10 percent of the state forest area, represents the range of natural diversity and ecological reference conditions historically present, and is resilient to climate change. The objectives in this section represent steps forward in managing these areas to promote biodiversity in the state forests.
- » Several management priorities in this section include actions, such as surveys, that are resource intensive. **It is not clear from the plan how these actions will be accomplished or prioritized, given the DNR’s finite resources and many competing priorities.**

### Rare and trailing-edge species

- » The plan acknowledges that rare wildlife species, especially boreal species, are at high risk from climate change, and suggests that improved habitat connectivity could help conserve these species. **It does not include any metrics of habitat connectivity or a plan to increase or maintain migration corridors.**
- » Three wildlife species with habitats instate forests are listed in the plan as both rare and highly vulnerable to climate change: lynx, moose, and common loon. **The plan does not include or reference species-specific management guidance for any of these species. While management actions may or may not result in a stable population of Michigan moose over the long term, action should be taken to conserve the genetic diversity in this relatively isolated, trailing-edge population.**
- » The plan does not include information on trailing-edge plant populations—although there are certainly many in Michigan—or **plans for managing entire trailing-edge ecosystems, such as boreal forest, as they transition away from their current state into more heat-tolerant systems.**

### Climate change mitigation

#### Carbon capture and sequestration

- » Carbon capture and sequestration (CCS) is identified as an area within which the DNR needs more data to understand emerging trends in energy development but acknowledges that the 2022 Michigan Healthy Climate Plan goal of economy wide decarbonization by 2050 and federal funding to spur CCS technologies will likely increase pressure for CCS developments on state forest lands.

- » The DNR's stated CCS objective is to lease and permit appropriate sites on state forest lands. Its objectives of conducting comprehensive reviews of applications and measuring the number of permits is predicated on external actions and do not demonstrate a proactive approach to CCS exploration and deployment on state forest lands.
- » Beginning in 2020, Michigan was the first state in the nation to develop a carbon credit program on state forest land which now includes three project areas (Pigeon River, Jordan River Valley, Keweenaw). The program is designed to allow carbon emitting businesses to purchase carbon offset credits representative of managed state forest lands. **The plan indicates that the DNR will explore expansion of the carbon credit program throughout the 10-year plan period but does not address any urgency to coordination with the Michigan Department of Environment, Great Lakes, and Energy to align with the Michigan Healthy Climate Plan decarbonization goals.**

### Energy production

- » The renewable energy section of the plan indicates that it is a priority for the DNR to develop siting guidance and management best practices for the deployment of utility-scale renewable energy on state forest lands. As the siting of utility scale renewables on private property remains highly contentious, and often expensive for developers and utilities, the path of least resistance could potentially be through engagement with the DNR to access state forest lands. The challenge will be in the implementation of future renewable energy developments. **Utility scale generation facilities should be developed in a manner that coordinates associated infrastructure corridors to align with wildlife migration goals and mitigate the introduction of invasive species. These issues are not outlined in this plan but may be included in the best practices to be developed in the future.**

### Invasive species

Many of the actions identified in this section are likely to be resource intensive, especially as the plan recognizes that nonnative pests and pathogens could become more common as the climate changes. The plan does not have a framework for how these actions could be accomplished or prioritized. Some actions, like maintaining diverse forest types and diversity within stands, promote overall forest resilience, which is beneficial for a number of reasons and should be prioritized regardless. Other actions, such as thinning or adjusting rotation length for species that are more vulnerable to pathogens or insects as they mature, might conflict with other management goals.

- » Non-native insects and diseases are a management priority in the plan. Several of these species have their own management guidance or strategies that are not included in this document; for others, management strategies are less detailed. The objectives and actions in this section are concrete and realistic, focusing on treating outbreaks in specific stands, along with management of host species and monitoring more broadly.
- » Throughout the sections on forest habitat management and biological diversity, invasive species are repeatedly mentioned as threats to Michigan forest diversity and health, and the plan states that promoting overall diversity in species, community types, and age classes is a way to help forests be more resilient to these species. **It does not specify how these actions dovetail with the role of state forests as a source of timber, which is often achieved by planting even-aged stands of a single species.**
- » Invasive plants are listed as a management priority and are recognized as a threat to forest diversity and function. The actions under the objectives in this section are focused on improved monitoring and decontamination; **however, one suggested action is to maintain closed-canopy conditions to reduce**

establishment of invasive plants. This action conflicts with the stated goal of maintaining a mosaic of forest types, including early-successional forest, nonforested openings, and oak-dominated systems.

- » The final part of the management objective dealing with invasive plants acknowledges that climate change will likely make the problem worse and identifies several metrics for monitoring progress in this area. **The metrics are focused on treatment and management rather than prevention of new invasions.**

## Public access

- » The plan appears to strike a positive balance between management practices for different types of state forest recreation activities. It places a high priority on strategic land acquisition to combat fragmentation and consolidate state managed forest lands and facilitate dispersed recreation activities. Additionally, it states a commitment to preserving hunting access in the face of declining hunter participation by proactively communicating hunting opportunities to non-traditional audiences and maintaining roads and trails that ensure hunter access to state game areas.
- » Parity between motorized and nonmotorized trail access and use is not directly addressed. Sections discussing the management of both trail types indicate that the DNR is emphasizing public engagement, particularly as it pertains to permanent trail closures that result from climate impacts (e.g., flooding) as well as planned logging or forest treatments. However, the nonmotorized section indicates that the priority is quality over quantity driven by the Michigan DNR Trails Plan (planning period 2022-2032). The plan prioritizes the increase of volunteer maintenance programs for nonmotorized trails and indicates the use of multiple engagement strategies to gain feedback from nonmotorized trail users. **The DNR Trails Plan already identifies funding as a primary constraint for nonmotorized trail construction and maintenance. Beyond increasing volunteer participation (over the entire 10-year period), it is not clear in the plan how engagement efforts will be funded and result in quality improvements for the nonmotorized trail network. Despite indicating the management goal of nonmotorized trail quality, the only metrics identified for the nonmotorized trail section are related to tracking trail mileage.**

## Tribal Consultation

- » The plan states a specific intent to increase Tribal participation in Michigan's forest management decisions through a combination new direct engagement protocols and future staff training on culturally appropriate communication expectations and indigenous knowledge of natural resources. It further articulates a priority of partnering with Tribal communities to respond to the climate crisis in a manner that protects sensitive cultural knowledge while leveraging Tribal expertise to manage culturally significant sites and species, particularly those most vulnerable to climate change.
- » The DNR commits to developing a Tribal engagement framework built on the International Association for Public Participation's [IAP2 Spectrum of Public Participation](#). The spectrum includes five levels of engagement beginning with the lowest impact to the highest impact on management decisions including: inform, consult, involve, collaborate, and empower. Additionally, the plan points to the DNR's obligation to follow Governor Whitmer's executive directive ([2019-17](#)) to ensure executive agencies appropriately consult with Michigan's Tribal nations on all issues impacting the health, safety, and welfare of shared communities.
- » **The metrics identified for measuring tribal engagement do not appear to offer much, if any, clarity on the quality and authenticity of the DNR's future engagement with Michigan's Tribal nations. The three identified**

metrics measure the number and type of engagements with Tribal partners and the number of DNR staff trainings on Tribal matters.

## **Conclusion**

The 2024 Forest Management Plan demonstrates growth in the DNR's acknowledgement of the climate crisis and consistent integration of climate-based forest management considerations. Though very large, the current plan format consolidates numerous DNR priorities into a single document that allows for easier public reference in the future. However, the challenge will be in the implementation details. While the plan cannot address every priority in a granular manner, it relies on many future engagement and planning processes over the next decade. Considering the release challenges associated with the forest management plan, the public and other management stakeholders may question if the DNR has the resources and commitment to offer the public a fair opportunity for participation in issue specific planning processes.