

**Michigan Environmental Council * Michigan League of Conservation Voters *
Upper Peninsula Environmental Coalition * Chicken Trampler Ultralight Gear *
Environmental Law & Policy Center * Keweenaw Charter Fishing Co. *
Keweenaw Youth for Climate Action**

June 23, 2025

Reviewing Officer
Attn: PAL-LSC Objections
USDA Forest Service, Eastern Region
626 E. Wisconsin Ave., Suite 700
Milwaukee, WI 53202
Email: objections-eastern-region@usda.gov.

Cc: Amber Tembreull <amber.tembreull@usda.gov>
Christopher Kovala <christopher.kovala@usda.gov>

RE: North Victoria Vegetation Management Project, #63753

Dear Reviewing Officer,

As members of the Keep the U.P. Wild coalition, we appreciate the opportunity to file this objection to the Ottawa National Forest's Draft Decision, issued May 23, 2025, for the North Victoria Vegetation Management Project located in the Bergland and Ontonagon Ranger Districts. See <https://www.fs.usda.gov/r09/ottawa/projects/63753>

The Forest Service is aware that we submitted written comments on June 10, 2024, and June 18, 2024, on the Project's Environmental Assessment and Draft Finding of No Significant Impact. In those comments, we requested that the acreage in the Project's overlap (see map below) with the Trap Hills be removed from the Project, and that if any logging does proceed in the overlap during the Project's 30-year implementation, that it not impair the possibility of a Wilderness designation, which is the goal of the Keep the U.P. Wild coalition and its hundreds of member organizations and businesses.¹

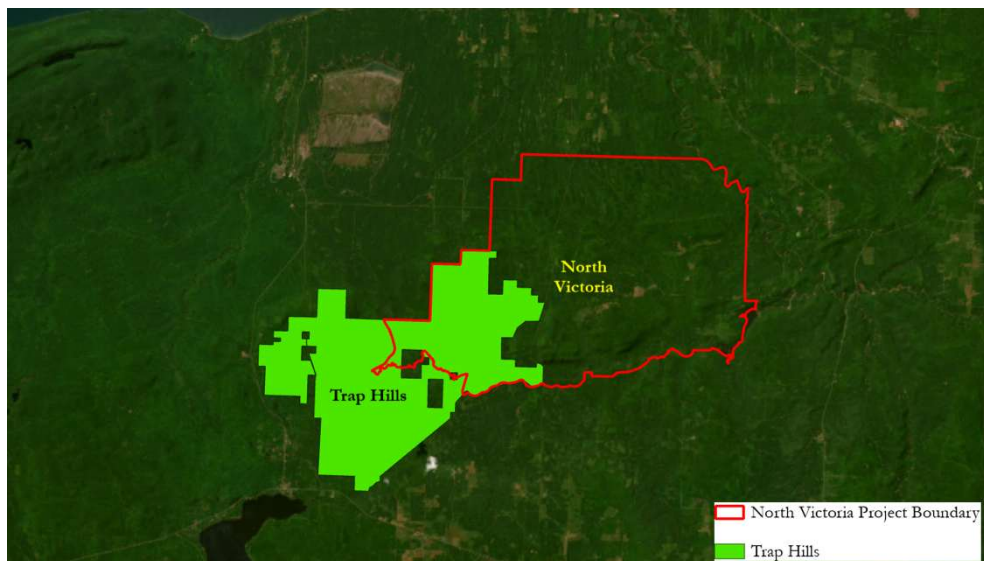
If, as the Ottawa National Forest indicated in its written response to our prior comments, the Project does nonetheless proceed to allow some logging in the Trap Hills area, **we specifically request that you use your authority to delay implementation of selection-cut and clear-cut logging for at least 10 years for the 6,137 acres in which the proposed Wilderness area overlaps with the Trap Hills in order to preserve the opportunity for future Wilderness designation of the area by Congress.**

That 6,137 acres amounts to about 20% of the proposed Project's overall 30,000+ acres.

¹ The Keep the UP Wild coalition supports Wilderness designation for the 25,000-acre Trap Hills, along with an additional 26,000 acres of the national forest across the Ehlco Area, Norwich Plains, and a proposed Sturgeon River Gorge Wilderness addition. Learn more at www.KeepTheUPWild.com.

Delaying the Project's logging is important to protect the larger aspen, birch, and other hardwoods that dominate the area. Nearly 70% of the tree-stand acreage to be logged in the North Victoria Vegetation Management Project's overlap with the Trap Hills has a year of origin that is 75 to 125 years old, indicating the presence of mature forest and likely some old growth trees, too, as we explain in detail in the maps and tables below.

North Victoria Logging Project's Overlap with the Trap Hills Proposed Wilderness



Map of Proposed Wilderness²: The map above depicts the overlap between the proposed Trap Hills Wilderness and the North Victoria Vegetation Management Project.

The Public Supports Protecting the Wilderness Characteristics of the Trap Hills

The North Victoria Vegetation Management Project, as described in the Draft Decision, is inconsistent, as you understand, with the proposal by the Keep the U.P. Wild coalition—which includes more than 350 Michigan organizations and businesses and their thousands of members and supporters—to designate the 25,000-acre Trap Hills area of the Ottawa National Forest as Wilderness. Support for this designation is growing and comes from environmental, business, outdoor-recreation, hunting, fishing, student, political, veterans, outdoor-advocacy, and faith groups, including more than 70 Upper Peninsula-based organizations and businesses.³ The current Wilderness campaign is rooted in similar local efforts tracing back to the mid-1980s.

The Keep the U.P. Wild coalition's comments on the Environmental Assessment requested that the Project's overlap with the Trap Hills be removed from the logging proposal to allow Congress

² An interactive map of the Ottawa National Forest lands that Keep the U.P. Wild is proposing that Congress designate as Wilderness lands can be found here: <https://www.arcgis.com/apps/mapviewer/index.html?webmap=3917fb38d92e424189ad98de010b4fdd>.

³ Please note that in addition to this objection, we have included a letter signed by dozens of Keep the U.P. Wild's supporters calling for the Ottawa National Forest to protect the Wilderness characteristics of the Trap Hills.

more time to act through the federal Farm Bill or otherwise to designate the Trap Hills as Wilderness. The Ottawa National Forest's written response said that the Project is "aligned with actions identified and allowable in the 2006 Ottawa National Forest Land and Resource Management Plan." We note, however, that the 2006 Forest Plan⁴ is almost 20 years old, which is contrary to the federal requirement that "a plan must be revised at least every 15 years."⁵ As a result, the Forest Plan may not reflect the current conditions found in the Trap Hills.

During the Ottawa National Forest's public process to develop the 2006 Forest Plan⁶, and replace the 1986 Forest Plan, nearly 200 people submitted comments related to Wilderness protection, with many requesting that the Trap Hills be designated as Wilderness and that Wilderness characteristics be protected in additional areas as well.⁷ The Forest Service, however, evaluated only the Ehlco area for Wilderness protection, not the Trap Hills, which the agency declared was "not considered suitable due to its established transportation routes and small core size."⁸

The Trap Hills deserves renewed consideration as Wilderness, however, given the maturation of the forest in the last two decades and the sustained and growing public interest in protecting the area as Wilderness. We also note that the "established transportation routes" in the Trap Hills primarily consist of lightly traveled, unpaved forest roads used by hunters, recreationalists, and North County Trail volunteers to maintain their segment of the trail. In addition, Keep the U.P. Wild's Wilderness proposal for the Trap Hills includes the designation of "non-wilderness corridors" for the forest roads, Old M-64, railroad, and the trails, including snowmobile trails, the Pioneer Trail, the North Country Trail (NCT), and other hiking trails.

A recent example of the use of non-wilderness corridors as a management tool is found in the May 2024 bill introduced by then-Sen. Mike Braun: the Benjamin Harrison National Recreation Area and Wilderness Establishment Act of 2024.⁹ This bill defined a non-wilderness corridor as the "land 100 feet in width from either side of the centerline of the existing trails and roads ... which is not included as part of the 'Proposed Wilderness.'" Keep the U.P. Wild's adoption of the non-wilderness corridors should alleviate the Ottawa National Forest's concerns regarding "established transportation routes" and allow for a comprehensive Wilderness evaluation for the entire 25,000-acre Trap Hills, rather than the Ottawa National Forest considering only a "small core size" of the area, as it did in 2006.

The 2006 Forest Plan did recognize some of the unique characteristics of the Trap Hills by designating two portions as Special Interest Areas, offering this description:

The ID team reached consensus that the main values associated with the "Trap Hills" include rock walls, outcrops, cliffs, and talus; vistas and outstanding scenic

⁴ See the Ottawa National Forest's 2006 Forest Plan at <https://www.fs.usda.gov/r09/ottawa/planning>.

⁵ See 36 CFR § 219.7 New plan development or plan revision at <https://www.ecfr.gov/current/title-36/chapter-II/part-219/subpart-A/section-219.7>.

⁶ See the Ottawa National Forest's 2006 Forest Plan at <https://www.fs.usda.gov/r09/ottawa/planning>.

⁷ See the 2006 Ottawa National Forest Final Environmental Impact Statement, Appendix C - Wilderness Evaluation, p. C-17 at <https://usfs-public.app.box.com/s/wp7q81251rkzdg285uhyqvrbuv6q8pk>.

⁸ See the 2006 Ottawa National Forest Final Environmental Impact Statement, Appendix C - Wilderness Evaluation, p. C-17 at <https://usfs-public.app.box.com/s/wp7q81251rkzdg285uhyqvrbuv6q8pk>.

⁹ See <https://www.congress.gov/bill/118th-congress/senate-bill/4402/text>.

values; historic sites associated with mining and a fire tower; rare and listed plant species; hiking opportunities (North Country National Scenic Trail). These values mean the area could be designated under any or all of these SIA categories in the FSM: geologic, scenic, historic, botanic, or recreational. ... It is mostly northern hardwood forest types, with small areas of black ash drainages. This core area is almost all under federal ownership. This is the area many people think of when they hear “Trap Hills.”¹⁰

We agree with the Forest Service’s view that the Trap Hills are “comprised of large tracts of undisturbed forest, rugged slopes and ridges, streams, waterfalls and ponds, [and they offer] solitude and [a] sense of remoteness that is unique in the Great Lakes area.” In addition, the highest sheer cliff in Michigan is found in the Trap Hills, boasting visibility of up to 40 miles and views of some of Michigan’s most spectacular scenery.



Image: Cascade Creek and Michigan’s highest sheer cliff

Overall, the area is largely pristine and includes nearly undisturbed habitat for a diverse wildlife population. Common species like black bear, white-tailed deer, beaver, and raccoon, as well as rarer species like timber wolf, peregrine falcon, northern goshawk, and wood turtle, call the Trap Hills their home. The area also features a diverse array of flora, such as boreal and northern hardwood forests, cedar swamps, and lichen-encrusted cliffs, along with less common plant species like Braun’s holly fern and fairy bells (*Prosartes hookeri*)—the latter of which Michigan lists as “threatened” and, east of the Rocky Mountains, is found *only* in Gogebic and Ontonagon Counties in the Western U.P.

Implementation of the North Victoria Vegetation Management Project would involve substantial logging of older, larger trees in Management Areas 3.1A, and 6.1, and would include investments in new road construction or reconstruction of existing roads, which could impair potential Wilderness designation. It is our understanding that the Ottawa National Forest vegetative

¹⁰ See 2006 Ottawa National Forest Final Environmental Impact Statement, p. D-4.

composition is very close to or even within the 2006 Forest Plan's targets, even in the MA 3.1A areas with narrower desired condition ranges. Therefore, even if the overlap with the Trap Hills is not removed from inclusion in the Project, by at least delaying any logging or other Project activities in the 6,137 acres of Trap Hills for 10 years, would help to allow the Trap Hills to remain in alignment with the targets in the 2006 Forest Plan and preserve the Wilderness values and characteristics of the area.

Most of the Project Involves Logging Mature Trees That Contribute Ecological and Economic Benefits

As highlighted above, nearly 70% of the tree-stand acreage to be logged in the North Victoria Vegetation Management Project's overlap with the Trap Hills has a year of origin that is 75 to 125 years old, indicating the presence of mature forest and likely some old growth trees, too. Mature trees provide valuable ecosystem services in the national forest, such as water filtration and storage, carbon sequestration, and food and habitat for native plant and wildlife species. The mature black ash and mixed conifer swamps and northern hardwood forests also provide some natural resistance to wildfire, disease, and pests.

The mature forest of the Trap Hills has earned a reputation not only throughout Michigan but nationally¹¹ for the hiking and other outdoor recreational opportunities it provides to backpackers, deer and bear hunters, anglers, backwoods campers, and birdwatchers alike. Seventeen miles of the North Country National Scenic Trail wind through the Trap Hills, offering well-marked access and ridge-top views of largely unbroken forest for 40 miles on a clear day. Delaying logging in the Project's overlap with the Trap Hills for at least 10 years would preserve its Wilderness characteristics and bolster the Western Upper Peninsula's \$360 million-a-year recreation and tourism economy¹² by preserving the opportunity to enshrine all of these special forms of recreation.

Michigan's outdoor recreation economy contributed \$12.4 billion in value-add in 2022¹³, supporting 119,000 jobs and providing \$5.6 billion in compensation to employee households. A notable example regionally is Chicken Trampler Ultralight Gear¹⁴ in Hancock, a backpacking gear design company founded in 2018 by two Michigan Tech engineering graduates who are building a business based on the region's protected lands. They now sell gear across the U.S. and lead clients on multi-day group camping trips on Isle Royale and other portions of the Western Upper Peninsula.

¹¹ See "Out of Sight: Hiking Michigan's Trap Hills In Michigan's Trap Hills," May 1, 2002, *Backpacker Magazine*, at <https://www.backpacker.com/stories/out-of-sight-hiking-michigan-s-trap-hills/>.

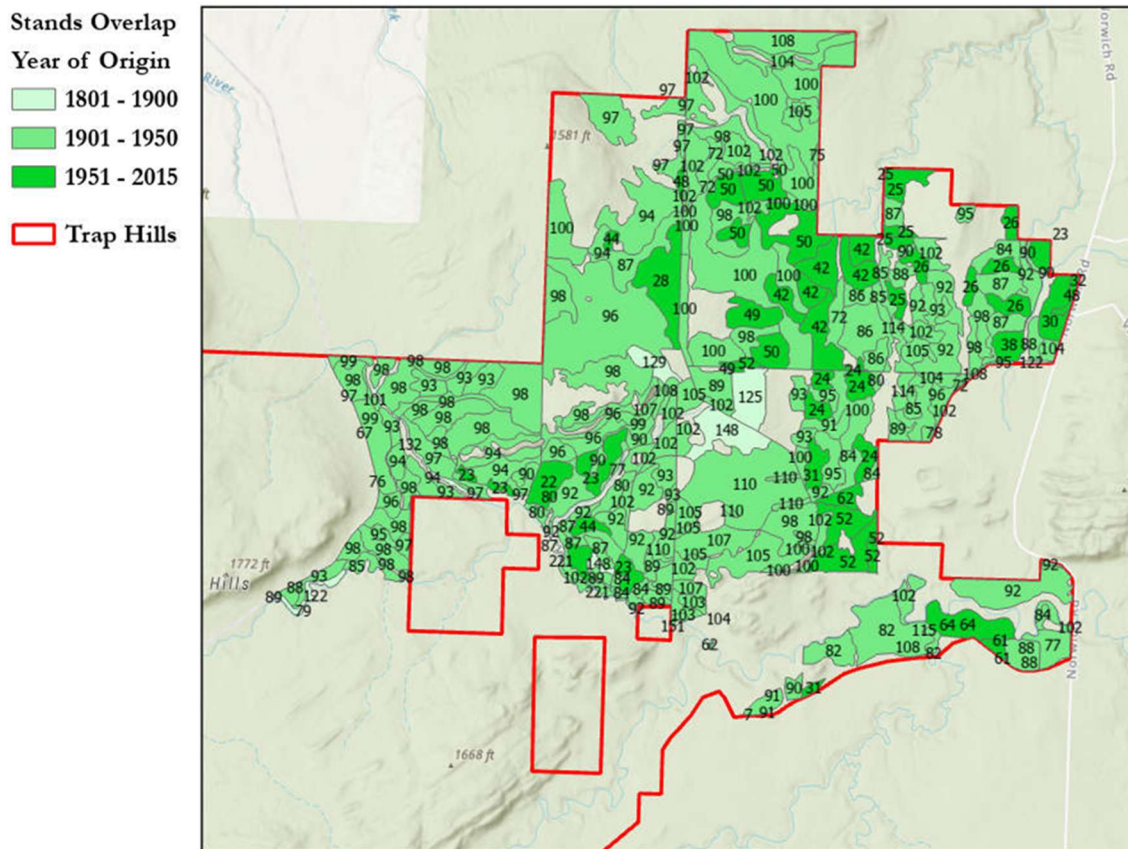
¹² See "Report details tourism patterns, \$360 million in economic benefits" | The Mining Gazette -- April 18, 2024, at <https://www.mininggazette.com/news/local-news/2024/04/report-details-tourism-patterns-economic-benefits/>.

¹³ See "Outdoor economy hits new high in Michigan; diverse industry demonstrates growth and resilience," by Kathleen Achtenberg, Michigan Economic Development Corp., November 27, 2023, at <https://www.michiganbusiness.org/news/2023/11/outdoor-economy-hits-new-high-michigan-diverse-industry-demonstrates-growth-resilience/>.

¹⁴ See "The story behind Chicken Trampler, the U.P. outdoor gear company with the unusual name," by Rich Jenkins, UpWord, Jan. 24, 2024, at <https://www.secondwavemedia.com/upword/features/chickentramp.aspx>.

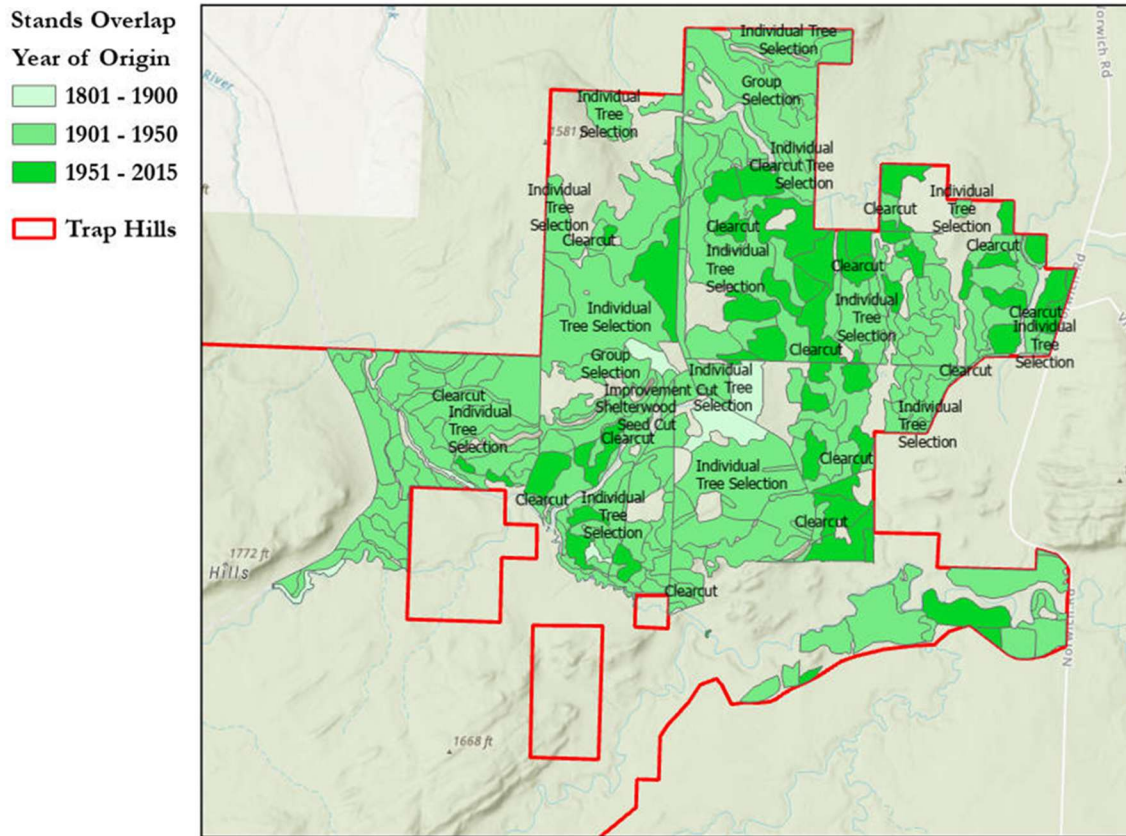
Promoting outdoor recreation in the Ottawa National Forest is consistent with the intent of Congress, which in 1960 passed the Multiple-Use Sustained-Yield Act (MUSY). Multiple-use is defined as “the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of American people” and redefined the primary purposes of the national forest as “outdoor recreation, range, timber, watershed, and wildlife and fish purposes” equally.

North Victoria Logging Project Overlap Area: Stand Year of Origin



Map of Stand Year of Origin: The map above of the Project’s overlap of the proposed Trap Hills Wilderness displays tree stand year of origin, based on U.S. Forest Service data in groupings of Pre-1900, 1900-1950, and 1951-2015, using the lightest green hue for the oldest trees. Most of the tree stands originated from 1901-1950 and are 75 to 125 years old. In general, much of the aspen and short-lived conifers and some of the hardwoods, including mature trees, would be clear-cut, and while the rest of the trees in the Project’s Trap Hills overlap area would be selectively cut or thinned.

North Victoria Logging Project Overlap Area: Stand Year of Origin & Proposed Stand Treatment



Map of Stand Year of Origin & Proposed Treatment: The map above of the Project's overlap of the proposed Trap Hills Wilderness displays the stand year of origin in lighter hues for the older trees, and proposed treatment. In general, much of the aspen and short-lived conifers and some of the hardwoods, including mature trees, would be clear-cut and the rest selectively cut or thinned.

North Victoria Logging Project & Overlap Area: Stand Year of Origin

	All NVVMP		Overlap		Non-Overlap		Percent Overlap stands	Percent Overlap Acres
	Stand count - ALL	Total acres - ALL	Stand count	Total acres	Stand count	Total acres		
Origin decade								
Pre-1900	10	340	3	168	7	171	30%	50%
1900-1940s	348	11,110	131	4,184	217	6,926	38%	38%
1950s-2010s	92	3,164	26	784	66	2,380	28%	25%

Based on USFS data, Year of Origin. Excludes stands where Year of Origin data is not available.
Stands with planned logging treatments only

Table of Stand Year of Origin: This table indicates that about 3% of the tree stand acreage in the Project's overlap of the proposed Trap Hills Wilderness had a year of origin before 1900, 68% with a year of origin between 1900-1940s, and 13% between the 1950s-2010s. Note that 1,001 acres to be logged have tree stands with an unknown year of origin. Nearly 70% of the stand acreage to be logged in the overlap area is thus 75 to 125 years old.

North Victoria Logging Project's Overlap Area: Vegetation Type and Stand Year of Origin

Vegetation type	Total Acres													
	Unknown Origin	1870	1890	1900	1910	1920	1930	1940	1950	1960	1970	1980	1990	Grand Total
Aspen-white spruce/balsam fir						9	126							135
Balsam fir-aspen/paper birch	1			34	12	13	45	3						107
Hemlock	7													7
Mixed upland hardwoods	116	76	93	13	22	253	206	9	21				106	914
Northern hardwoods-hemlock	24													24
Northern red oak						15								15
Quaking aspen	7				12	201	160				363	223	50	1,017
Red maple (dry site)						66								66
Sugar maple	165				67	33								265
Sugar maple-basswood					22		26	23						71
Sugar maple-beech/yellow birch	681				509	2,061	205	36		21				3,514
Sugar maple-northern red oak							4							4
Grand Total	1,001	76	93	47	644	2,651	772	70	21	21	363	223	156	6,137

Note: Data shown is only for stands to be logged.

Table of Vegetation Type & Stand Year of Origin: This table presents the vegetation type by stand year of origin and stand count. The largest group by vegetation type is sugar maple-beech/yellow birch, which comprises about 57% of the stand counts, followed by quaking aspen making up about 17% of stands, and mixed upland hardwoods at about 15%. In general, the pre-1920 stands (some over 150 years old) consist mainly of sugar maple-beech/yellow birch, mixed upland hardwoods, sugar maple, and balsam-fir-aspen/paper birch.

North Victoria Project & Overlap Area: Vegetation Type by Stand Count & Acres

Vegetation type	All		Overlap		Non-Overlap		Percent Overlap stands	Percent Overlap Acres
	Stand count - ALL	Total acres - ALL	Stand count	Total acres	Stand count	Total acres		
Aspen-white spruce/balsam fir	10	150	9	135	1	15	90%	90%
Balsam fir-aspen/paper birch	15	312	10	107	5	205	67%	34%
Black ash-American elm/red maple	4	43			4	43	0%	0%
Eastern white pine	11	272			11	272	0%	0%
Hemlock	1	7	1	7			100%	100%
Mixed lowland hardwoods	4	43			4	43	0%	0%
Mixed upland hardwoods	174	6,110	29	914	145	5,195	17%	15%
Northern hardwoods-hemlock	14	364	1	24	13	340	7%	6%
Northern red oak	3	81	1	15	2	66	33%	19%
Quaking aspen	117	3,359	41	1,017	76	2,342	35%	30%
Red maple (dry site)	3	103	1	66	2	37	33%	64%
Red maple (wet site)	2	47			2	47	0%	0%
Sugar maple	14	627	7	265	7	362	50%	42%
Sugar maple-basswood	14	685	3	71	11	615	21%	10%
Sugar maple-beech/yellow birch	108	4,264	77	3,514	31	750	71%	82%
Sugar maple-northern red oak	4	105	1	4	3	101	25%	4%
White ash	1	8			1	8	0%	0%
White spruce	1	9			1	9	0%	0%
Grand Total	500	16,588	181	6,137	319	10,451	36%	37%

Note: Data shown is only for stands to be logged.

Table of Vegetation Type, Stand Count, & Acres: The table above shows the type of vegetation that would be logged in the Project, along with the number of tree stands and acreage of that type. In total, about 181 tree stands covering 6,137 acres would be logged in the Project's overlap with the proposed Trap Hills Wilderness, with the largest portions by acres consisting of sugar maple-beech/yellow birch (about 57%), quaking aspen (about 17%), and mixed upland hardwoods (about 15%).

Conclusion: The Keep the U.P. Wild coalition members request that the Forest Service use its authority to delay implementation of selection-cut and clear-cut logging of the 6,137 acres of the overlap with the Trap Hills for at least 10 years to preserve the opportunity for future Wilderness designation of the area by Congress. Thank you for your consideration.

Respectfully submitted,

Michigan Environmental Council – Emily Smith, Land & Water Conservation Policy Manager

Michigan League of Conservation Voters – Nicholas Occhipinti, State Government Affairs
Director

Upper Peninsula Environmental Coalition – Evan Zimmermann, President

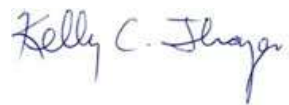
Chicken Trampler Ultralight Gear – Austin Gongos & Nathan Ackerman,
Co-founders & Co-owners

Environmental Law & Policy Center – Kelly Thayer, Senior Policy Advocate

Keweenaw Charter Fishing Co. – Captain Travis White

Keweenaw Youth for Climate Action – Elise Rosky & Gabriel Ahrendt, Co-founders

Contact and lead objector for the Keep the U.P. Wild coalition:



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Email: KThayer@elpc.org

Appendix 1: Overlap Area Between Proposed Trap Hills Wilderness Area and North Victoria Vegetation Management Project

LOCATION	STAND_ID
00030	09070100030015
00030	09070100030021
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00030	09070100030102
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