

August 29, 2022

Mr. Jamie Barbour  
Assistant Director  
Ecosystem Management Coordination  
USDA Forest Service  
Washington, DC

Dear Mr. Barbour:

The undersigned organizations, which represent millions of America's anglers, hunters, recreational shooters, wildlife conservationists, and the industries they support, write to express our position on the Forest Service's and Bureau of Land Management's efforts to define old growth and mature forests (Fed. 87 Fed. Reg. 42493-42494, No. 2022-15185).

Old forests are one of many important successional stages. We believe that emphasizing old growth (and now adding mature forest) with a broad brush and without respect to forest type, and in a way that places priority over other forest types, may hinder the ability of the USFS to optimize carbon stewardship, resilience, and biodiversity. Therefore, as the Forest Service moves forward as directed per Executive Order 14072, we offer the below information to support stewardship of our National Forests, including active management and conservation where science supports their uses.

We support a definition framework, and resulting policy, that recognizes and facilitates forest management to optimize carbon stewardship, forest successional stage representation, wildlife habitat, and all co-benefits. We commend this Administration's recognition of forests as climate mitigation powerhouses while seeking balance among carbon, wildlife, watersheds, wood products, recreation, and planning efficiency. Through pragmatic, sustainable forest management, we can accomplish the greatest good for the greatest number over the longest period.

Biodiversity is not necessarily synonymous with old growth, and management needs vary based on forest type. However, biodiversity *is* often maximized when many forest ages are interspersed across landscapes. Promoting forest diversity – a shifting mosaic of young, middle-aged, and old forest across landscapes is imperative in many forest types. Sound active management is often essential to achieve such biodiversity, including in many old and mature forests where understory treatments and prescribed burning are needed to maintain forest health. Beyond the ecological realities of prioritizing certain seral stages of forest in management, there are innumerable economic, social, spiritual, and cultural impacts to those who depend on forested landscapes.

Existing frameworks may be utilized to accomplish these management goals. The 2012 Planning Rule mandated an ecological reference model to evaluate ecological integrity. Natural Range of Variability (NRV) was built as a framework to meet this need. A related concept, Historical Range of Variation (HRV), also incorporates historic human disturbance (i.e., Indigenous land-use) with ecological characteristics appropriate for a given management application. Combined, the NRV and HRV frameworks provide a durable, adaptive framework for understanding forest characteristics of *all* successional states (not just old growth and mature) *and* their variation across community types, site productivity, and geographic regions.

Building upon and improving the existing systems (which are in use across many National Forests) rather than reinventing them, will save thousands of staff hours, millions of dollars, and time. Time is not on our side, as urgent action is needed at landscape-scale to increase wildlife habitat diversity, connectivity, and reverse declines in Species of Greatest Conservation Need before it is too late.

Many of the undersigned organizations are submitting specific recommendations on relevant ecosystems. We encourage you to incorporate their input and utilize their expertise in this rulemaking process. We appreciate your consideration of these comments and look forward to working with the Administration throughout this rulemaking process.

Sincerely,

American Woodcock Society  
Archery Trade Association  
Association of Fish and Wildlife Agencies  
Bear Trust International  
California Waterfowl Association  
Camp Fire Club of America  
Catch-A-Dream Foundation  
Congressional Sportsmen's Foundation  
Dallas Safari Club  
Delta Waterfowl  
Houston Safari Club  
Mule Deer Foundation  
National Bobwhite & Grassland Initiative  
National Deer Association  
National Shooting Sports Foundation  
National Wild Turkey Federation  
North American Grouse Partnership  
Orion: The Hunter's Institute  
Pheasants Forever  
Public Lands Foundation  
Quail Forever  
Rocky Mountain Elk Foundation  
Ruffed Grouse Society  
Safari Club International  
Sportsmen's Alliance  
Theodore Roosevelt Conservation Partnership  
Whitetails Unlimited  
Wild Sheep Foundation  
Wildlife Forever  
Wildlife Management Institute  
Wildlife Mississippi