

September 20, 2024

Mrs. Jennifer McRae, NOGA Planning Team Leader  
United States Forest Service  
201 14th Street SW, Mailstop 1108  
Washington, DC. 20250-1124

**RE: Hunt-Fish comments on Draft Environmental Impact Statement to guide old growth management on national forests**

*Submitted via comment portal:* <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

Dear Mrs. McRae:

The below signed hunting, fishing, and wildlife conservation organizations have been actively engaged in the Forest Service's National Old Growth Amendment process since its inception to ensure this proposal works for sportsmen and women. We're glad to see many of our recommendations and comments included in the agency's current approach and largely support the proposed action (Alternative 2) as developed by the U.S. Forest Service (USFS) in the Draft Environmental Impact Statement (DEIS) that intertwines active stewardship as a key tool to provide consistent direction and restoration management approaches to maintain and restore our nation's oldest forests.

As stated in the socio-economic report of the DEIS (pg. 59), the public lands managed by the Forest Service "*in the lower 48 states provide habitat for 80 percent of elk, mountain goat, and bighorn sheep, 12 million acres of waterfowl habitat, and 28 million acres of wild turkey habitat. Forest Service lands boast approximately 220,000 miles of fishable streams and rivers and more than 10 million acres of fishable lakes and reservoirs.*" In short, our National Forests are invaluable to America's 40 million hunters and anglers by providing all of us a place to pursue our passions. The proposed action balances the need to provide consistent management direction for our nation's oldest forests while maintaining active management and other tools needed to restore and maintain healthy forest habitats for a diversity of fish and wildlife species for future generations to enjoy our public lands.

We support the agency's assessment in the proposed action that active restoration through proactive stewardship provides benefits and enhances older forests in many places on the landscape, especially in fire-adapted ecosystems and appreciate the recognition that other forest types, such as younger forests, are also important. We agree with the proposed action's approach that would allow for commercial timber sale funding to meet restoration objectives and work facilitated through existing authorities such as the Good Neighbor Authority and other stewardship contracts and agreements that accounted for over 40 percent of the entire agency USFS timber program in 2023 (3.1 billion board feet of volume sold, DEIS pg. 36).

**Principles and Statements of Support:** Specifically, we believe that any forthcoming forest management policies for our national forests should support the following outcomes:

1. **Recognition of Active Forest Management:** There is broad agreement that active forest management is necessary in many forests across the country to reduce risks of uncharacteristic wildfire, optimize carbon outcomes, improve fish and wildlife habitat, and restore impaired ecosystem function. As a tool, active management is not a universal replacement for natural disturbances and neither active nor passive

management are appropriate in all situations. For example, some temperate rainforests in the Pacific Northwest and Alaska that are not fire prone forests may benefit from passive stewardship.

2. **Flexibility in Management Practices, Local Decision Making:** The importance of flexibility within management practices must be emphasized, and a diverse suite of management tools should be utilized to ensure the health and sustainability of old-growth forests. Local decision-making input is key for successful implementation, and our organizations support the agency's management approach to develop locally driven and stakeholder-involved adaptive management plans at the forest unit level to best implement projects that enhance old-growth and other forest types.
3. **Complementing Wildfire Management Efforts:** we support the alignment of the National Old Growth Amendment with the USFS Wildfire Crisis Strategy, recognizing the critical threat that wildfires pose to national forest ecosystems.
4. **Increase the Pace and Scale of Forest Restoration and Reduce Litigation:** Data from USFS Research Stations has found that vegetation management at much larger geographic scales is needed to restore forest health and promote resilience of old forests as well as young, regenerating forests. Programs and agreements such as Keystone Agreements, Shared Stewardship Authority, Good Neighbor Authority, and the Water Source Protection Program have been instrumental in enhancing the pace and scale of managing healthy forest stands, benefiting wildlife habitat, and reducing fire risk to communities. The National Old Growth Amendment should complement programs such as these and should be designed in a way that will not create opportunities for additional litigation across our forests.
5. **Recognize the importance of other forest types:** Wildlife research documents how wildlife diversity is greatest where diverse forest types and ages are interspersed across landscapes, including young, middle-aged, mature, and old-growth forests. We support policy and actions that recognize the importance of all forest successional states, young and old, and facilitate forest management to optimize carbon stewardship, wildlife habitat, and all co-benefits. Natural Range of Variation and Historical Range of Variation are useful forest planning tools to help managers understand old-growth and mature forest characteristics and their variation across community types and geographic regions and should be included as a tool in the development of the *Adaptive Strategies for Old Growth Forest Conservation*.

**Conclusion:**

In conclusion, the USFS Proposed Action offers a balanced and scientifically grounded approach to managing our nation's old-growth forests. It ensures that these forests remain resilient and sustainable for future generations while addressing current and future environmental challenges. The hunting, fishing, and conservation communities will remain engaged and encourage the agency to develop a durable and science-based plan that sustains our nation's forests and enhances the invaluable hunting, fishing, and other recreational opportunities these landscapes provide. We look forward to working with you to conserve and manage old-growth forests and other forest types to enhance ecological integrity across the National Forest System. Many of the undersigned organizations are additionally submitting their own comments that reflect their specific knowledge in these areas. We encourage you to incorporate their input and utilize their expertise through this process.

Sincerely,

American Fly Fishing Trade Association

American Woodcock Society

Archery Trade Association

Association of Fish & Wildlife Agencies

Backcountry Hunters & Anglers

Boone and Crockett Club

International Game Fish Association

Izaak Walton League of America

Mule Deer Foundation

National Alliance of Forest Owners

National Deer Association

National Wildlife Federation

National Wild Turkey Federation

North American Falconers Association

Orion: The Hunter's Institute

Pheasants Forever

Quail Forever

Ruffed Grouse Society

Theodore Roosevelt Conservation Partnership

Trout Unlimited

Whitetails Unlimited

Wild Sheep Foundation