

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM
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Title: Deputy Director, Forest Policy and PNW Programs
Comments: September 20, 2024

Jennifer McRae

Attn: National Old Growth Amendment

United States Department of Agriculture-Forest Service

1400 Independence Ave., SW

Washington, DC 20250-0003

Dear Jennifer McRae,

On behalf of undersigned 1247 members of the Theodore Roosevelt Conservation Partnership, thank you for the opportunity to comment on the National Old Growth Amendment Draft Environmental Impact Statement. As hunters and anglers who enjoy the vast acres of the National Forest System, we appreciate and support the USFS proposed action that includes management approaches that are complementary to wildrft e risk reduction eorff ts, active restoration, and vegetation management projects while maintaining and restoring older forests on our National Forest System lands. As the agency develops a final policy, there are several key priorities and considerations below that we believe are crucial for the final policy to be both durable and eeff ctive.

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 wildrft e, optimize carbon outcomes, improve sfi h 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 adapted 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 we 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 NOGA process 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 the USFS should conduct vegetation management at much larger geographic scales 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 NOGA 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 growth, 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.

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 stand to benefit from the proactive stewardship and other management approaches outlined in this alternative.

Thank you for your consideration.

Respectfully,

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Cairo, NE Gainesville, VA

Kyle Brazil Josiah Hunter

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Troy, MO Hillman, MI

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Severna Park, MD Rock Springs, WY

Theodore Carski Bill Christie

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Virginia Beach, VA Norwalk, CT

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Edward Contreras Edward Grimm

Azusa, CA Rockville Centre, NY

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