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First name: Benjamin

Last name: Jones

Organization: Ruffed Grouse Society

Title: President and CEO

Comments: Dear Ms. McRae and the NOGA Planning Team:

The Ruffed Grouse Society & American Woodcock Society is devoted to forest wildlife conservation. We envision landscapes of diverse, functioning forest ecosystems that provide homes for wildlife and opportunities for people to experience them. Grouse and woodcock are bellwethers of forest condition; they, and many species, can only persist in healthy, diverse forests. These same forests clean the air, filter water, and support local communities.

In partnership with you, the professional land stewards of the U.S. Forest Service, we support and advocate for science-based forest management. With you, we strive to be part of pragmatic solutions, not part of the problem. The latter including a steady stream of litigation, misleading communications and reference to faux-science. We stand strong with the Forest Service on Pinchot-style conservation.

We understand why a policy relevant to old growth forest was needed. Our hope (and input along the way) was that such a policy might help the Forest Service combat baseless litigation while still providing for active management - the very actions that are necessary to sustain old growth and overall forest health. Our greatest concern was that such a policy would preclude stewardship and be applied in an overly broad manner to all forest types and age classes. We believe you have effectively threaded the needle. But ultimately, the proof will be in how the policy is applied across the National Forest System.

Again, the comments here come from a partner who is actively engaged with you on stewarding these lands. They indicate our preferred DEIS Alternative and insights to facilitate sound planning and stewardship into the future.

These comments represent over 10,000 Ruffed Grouse Society & American Woodcock Society members who care deeply about forests and wildlife. Thank you for this opportunity.

Sincerely,

President & CEO, Ruffed Grouse Society & American Woodcock Society

1. Our comments focus on Preferred Alternative 2. This alternative, within the scope and scale of the amendment, is intended to further land management plans toward ecological integrity for old-growth forests and is anticipated to have a net-positive effect on the extent of old-growth forests and upon associated species, habitats, and ecosystem services. Given the combination of NOGAFW[1]STD-03 and the continuance of all management tools that could help implement proactive stewardship activities, including commercial timber harvest, Alternative 2 is anticipated to lead to achieving desired conditions in a manner that leads to overall forest health, provided that policy implementation considers the following important considerations.

2. Promoting forest diversity - a shifting mosaic of young, middle-aged, and old forest across landscapes is imperative to manage for forest health, wildlife and climate resilience. To do so, we must view forests as dynamic collections of equally important seral states, not just old growth, and everything else. Climate resilience, carbon

optimization, and biodiversity are maximized when many forest ages are interspersed across landscapes. Proactive management is essential.

During the Old Growth Proposal process, it was inappropriately suggested that, "The amount and distribution of mature forests across the National Forest System suggest that these lands have the inherent capability to sustain old growth forest conditions into the future." Rather, the amount and distribution of mature forest presents an opportunity to diversify forest structure, optimizing carbon and wildlife outcomes. Repeating the false assumption that swaths of forest can "inherently" become functional old growth hinders our ability to adapt and diversify the unnaturally single-aged mature forest matrix, especially in Eastern Forest ecosystems. In this way, policy implementation could limit the Forest Service's ability to promote resilience.

3. Policy implementation guidelines must recognize and facilitate forest management to optimize carbon stewardship, wildlife habitat, and all co-benefits. Forests are dynamic collections of equally important seral states, not just old growth, and everything else. Climate resilience, carbon optimization, and biodiversity are maximized when many forest ages are interspersed across landscapes. Proactive management is essential.

Accelerating the pace and scale of restoration work identified in existing Forest Plans and proposed Plan revisions is the adaptive process most rapidly leading to resilience. Policy implementation should establish more natural diversity in stand age and structure resulting in increased resilience. A forest mosaic of young, middle-aged, and old stands optimizes biodiversity and carbon outcomes, resists catastrophic disturbance, and recovers from unforeseen stresses most readily. The focus on single seral states (i.e., mature and old growth) and overarching policies of passive approaches inhibit adaptive capacity for climate resilience.

4. Policy implementation should not hinder managers' ability to promote forest resilience. There is broad agreement that increased forest management is necessary to curtail wildfire, optimize carbon outcomes, improve wildlife habitat, and restore impaired ecosystems. The challenge is how to increase the scope and scale of management, not how to inherently let everything older than an arbitrary age (i.e., mature) progress toward old growth.

Humans are major ecological players and have been for thousands of years. Forest science and professional experience tell us that humans must continue to play an active role in stewarding many natural systems. Adding acreage under "protection from management" limits USFS ability to respond to climate change and lead to loss of wildlife habitat, forest resilience and carbon optimization. Adding more acres under broad umbrellas of "mature" is concerning and limits our ability to steward and manage forests and navigate the climate crisis.

5. We support 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 (NRV) and Historical Range of Variation (HRV) are useful forest planning tools to help managers understand old growth and mature forest characteristics and their variation across community types and geographic regions. Because NRV and HRV are adaptive to variability over time, they can accommodate forest changes caused by climate, disturbance, and/or management. Using, and continually improving this existing system will save thousands of staff hours, millions of dollars, and time, the latter being of utmost importance in reversing declines for Species of Greatest Conservation Need.

Policy implementation should not inhibit the Forest Service's ability to strive for NRV as identified in Forest Plans.

Nor should policy implementation impact local managers' ability to achieve Natural and Historic Range of Variation. Striving to close the ecological departure gaps identified by NRV is key to forest and wildlife resilience.

6. Forest age diversity is imperative to manage for wildlife, forest health, and climate resilience. To do so, we must view forests as dynamic collections of equally important seral states, not just old growth, and everything else. Climate resilience, carbon optimization, and biodiversity are maximized when many forest ages are interspersed across landscapes. Old forest is essential (and lacking). Young forest is essential (and lacking).

The focus on a limited seral range (i.e., mature and old growth) is cause for concern. Especially when science tells us that forest age diversity is imperative and that we are lacking on both "tails" of the forest age curve, young and old. Given the importance of diversity and the precedent set with old growth policy focus over the past 22 months, we believe it is appropriate to have a proportional and commensurate policy focusing on young forest.

Managing our National Forest System as true conservation working lands provides capacity for ecosystem and infrastructure resilience. When we manage forests for ecosystem restoration, resilience, and diversity, commodity products (wood products) are put on the market. The result is much needed funding, funding that is vital to local communities and to repair and upgrade infrastructure and expand ecosystem restoration. Innovative frameworks are in place and working. There is no better way to ensure recovery and resilience than active management. This concept is inherent in the term "conservation" coined by Gifford Pinchot in establishing the National Forest System. "Protection through use." This was vitally important as the system was being established, and it remains so today.

We thank you again for this opportunity to engage with the Forest Service as a conservation partner.

Attachment - Old Growth DEIS Comments RGS & AWS 20240920.docx is the letter text above.