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Organization: Ruffed Grouse Society & American Woodcock Society

Title: Northeast Forest Conservation Director

Comments: Dear District Ranger Brown:

Thank you for allowing us to submit comments on the scoping letter for the Lost River Integrated Resource Project.

Ruffed Grouse Society & American Woodcock Society unites conservationists to improve wildlife habitat and forest health for Ruffed grouse, American woodcock, and all forest wildlife. We promote forest stewardship for our forests, our wildlife, and our future. We envision landscapes of diverse, functioning forest ecosystems that provide homes for wildlife and opportunities for people to experience them. Ruffed grouse and American woodcock are bellwethers of forest condition; they can only persist in healthy, diverse forests. These same forests clean the air, filter water, and support local communities. Together with the American Woodcock Society (established in 2014), we work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices.

Overall, RGS & AWS applauds the White Mountain National Forest's Pemigewasset Ranger District team for your efforts to promote forest resiliency and improve habitat diversity and other co-benefits associated with healthy, diverse forest landscapes. We strongly support science-based vegetative management activities like those incorporated in the Lost River Integrated Resource Project scoping letter and RGS & AWS is available as a conservation partner to help the Forest Service move these projects forward.

Numerous bird and wildlife species require forest habitat diversity and are declining. These species that are identified in New Hampshire's Wildlife Action Plan as Species of Greatest Conservation Need include Ruffed grouse, American woodcock, Golden-winged warbler, Spruce grouse and New England cottontail. New Hampshire's State Wildlife Action Plan's Chapter 5 Conservation Actions section identifies habitat management as one of several important tools to address this challenge. Recommended actions include incorporating young forest habitat conditions across landscapes (Section 1402) and promoting sustainable forestry (Section 1410) which when coupled with other outlined strategies promote resilient forest landscape conditions with a spectrum of forest ages and robust species composition diversity.

Our technical comments regarding the proposed vegetative management activities follow below:

The Lost River Integrated Resource Project is aligned with the White Mountain National Forest Land and Resource Management Plan's (LRMP) Chapter 1, page 20, Objective 4, which is to "provide regeneration age forest and open habitats to sustain biological diversity and support species that prefer those habitats". These activities also are consistent with the allowable forest management activities within MA 2.1 lands which work toward multiple use management and diverse co-benefits, including wildlife habitat and sustainable forest products.

White Mountain National Forest's LRMP Chapter 2 Table 1-04: Age Class Objectives establishes MA 2.1 guidelines for age class diversity by forest type, which targets 3-4% of the WMNF in young forest age groups for Northern Hardwoods and 12-15% in young forest conditions for Aspen-Birch types.

Page 3 of the Lost River IRP Scoping Letter (Vegetation & Habitat Management) states "This project is needed to improve wildlife habitat diversity within the Lost River and Franconia Notch HMUs, thereby helping to achieve the desired future conditions for wildlife and vegetation described in Chapter 1 of the forest plan. An analysis of the current habitat conditions indicates that the Lost River and Franconia Notch HMUs are not meeting the MA 2.1 habitat composition and age class objectives (forest plan, pp. 1-20 to 1-21). No regeneration-

age (0-9 years old) forest habitat occurs except for two permanent wildlife openings which are managed to maintain valuable grassy and shrubby habitat".

Page 4 (Proposed Activities) explains "The WMNF proposes to conduct commercial and non-commercial vegetation treatments on about 1880 acres (within about 2746 gross acres) of forest stands on National Forest System lands in the Elbow Pond and Franconia Notch HMUs (Table 1; Figure 2). Proposed units and treatment acres are provided in Appendix A. All silvicultural treatments would occur on MA 2.1 lands. All stands proposed for timber harvesting have site-specific objectives and corresponding silvicultural prescriptions to meet the design conditions for vegetation and/or wildlife habitat". This work includes a range of even and uneven-aged silvicultural activities, which among providing other ecosystem-oriented outcomes will increase age-class diversity and promote regeneration-aged habitat. Ruffed Grouse Society & American Woodcock Society supports the recommended vegetation management treatments.

Page 6, second paragraph states "In addition to commercial timber harvesting, non-commercial site preparation and release treatments would occur in units proposed for commercial treatments within three years following harvest. These and other proposed silvicultural treatments are described in the following section". We are available to support WMNF Pemigewasset Ranger District's commercial and non-commercial silvicultural work associated with the Lost River Integrated Resource Project. RGS & AWS is currently partnering with National Forests across the country via a range of agreements - USFS Region 9 agreement, shared stewardship agreements, challenge cost share agreements, contribution agreements, and other agreements related to BIL and IRA funding.

Ruffed Grouse Society & American Woodcock Society supports science-based sustainable forestry, promotes diverse forest landscape mosaics, and applauds the positive impacts this diversity has on resilience, climate, people, forests, and wildlife. We are a supporter of the Lost River Integrated Resource Project and applaud your efforts and work. As a national and regional conservation partner with members and a chapter in the Granite State, we support the Forest Service's efforts to initiate this project and we look forward to working with the agency as a key partner and stakeholder.

On behalf of our members and supporters, we thank you for your careful consideration and action to support healthy forests, abundant wildlife, climate solutions and promoting a conservation ethic in New Hampshire. RGS & AWS would be happy to comment further or address questions on these considerations in your future deliberations.

Respectfully submitted,

Todd H. Waldron

Northeast Forest Conservation Director