

Feb. 2, 2024

Ms. Linda Walker, Acting Director
Ecosystem Management Coordination
United States Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC. 20250-1124

RE: Hunt-Fish Comments on Notice of Intent on USFS “Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System”.

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

Dear Ms. Walker:

The below signed hunting, fishing, and wildlife conservation organizations work to advance the interests of millions of American hunters and anglers. Please consider our comments and recommendations related to the proposed USFS old growth amendment, which is intended, *“to create a consistent approach to manage for old-growth forest conditions with sufficient distribution, abundance, and ecological integrity to be persistent over the long term, in the context of climate amplified stressors.”*

The abundant public lands that make up our national forests and grasslands are of utmost importance to our community for providing habitat for numerous fish and wildlife species and abundant recreational opportunities valued by America’s 40 million hunters and anglers. Responsible forest management is necessary to sustain and support fish and wildlife populations across varied landscapes. Shifting climate conditions are contributing to more frequent and extreme weather events, uncharacteristic wildfires, invasive species, prolonged drought, floods, disease proliferation, and creating other challenges across America’s 193 million acres of National Forests and Grasslands.

Resilient, functioning forest ecosystems provide clean air, quality water, viable plant and animal populations, and a range of cultural values to society. Old growth trees and forests are important components of these ecosystems, and we appreciate the USFS effort to create a consistent approach to conserving and managing old growth trees across our national forest system. As a community, young, early seral, forests are also important, and we encourage the USFS to ensure that the value of early seral forests is recognized during National Forest plan amendment processes, where appropriate.

For many forest types, having stands with both diverse age classes and a diversity of species often means fewer invasives and disease, and reduced fuel loads, making them less susceptible to catastrophic loss from wildfire, often leading to more carbon storage than seen in less diverse, unhealthy forests. However, many forest types are at risk of becoming carbon sources rather than carbon sinks. Landscape- and ecosystem-appropriate management based on the best available science is necessary to adapt to changing climatic conditions while optimizing carbon storage. Without appropriate management responses, these climatic changes will fundamentally affect our outdoor heritage and the annual \$200 billion hunting and fishing economy and [\\$1.1 trillion-dollar outdoor recreation economy](#) in the U.S.

Our recommendations acknowledge and support the need for both protection and management of old growth forests, as well as the need for management by forest-type, all while planning for overall ecological and societal sustainability. There is no one-size-fits-all forest management strategy, but effective site-specific strategies can range from increasing carbon sequestration through active management that emphasizes reforestation and forest restoration, to stewarding late successional forests with long-term historic disturbance frequencies that store large volumes of carbon in soils and trees. Please consider our recommendations to ensure that vital habitats for a diversity of fish and wildlife species are maintained and improved over time—supporting ecosystem resilience and opportunities for future generations to enjoy our public lands.

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

- Promote forest diversity. A shifting mosaic of young, middle-aged, and old growth forests across landscapes is imperative to manage for climate resilience. To do so, we must view forests as dynamic collections of important seral states. Climate resilience, carbon optimization, and biodiversity are maximized when varying forest ages are interspersed across landscapes, from young forests to old growth.
- There is broad agreement that active forest management is necessary to reduce risks of uncharacteristic wildfire, optimize carbon outcomes, improve fish and wildlife habitat, safely restore forests to a fire-adapted forest condition, and restore impaired ecosystem function. The challenge is how to manage these landscapes at the scope and scale to address the increasing need.
 - As a tool, active management is not a universal replacement for natural disturbances and neither active management nor passive management are appropriate in all situations. Additionally, many active management actions, such as thinning or harvesting, must be accompanied by maintenance activities at regular intervals, such as reforestation or prescribed fire to maintain the effectiveness of a thinning project.
 - “Protection” or maintenance of old growth forests doesn’t necessarily mean hands-off. Many old growth conditions can be accelerated and/or maintained through active management, including, but not limited to, selective harvesting of trees and prescribed fire.
- Healthy forests play a huge role in carbon storage and sequestration. One of the primary values of old growth forests is carbon storage, as large trees store significant amounts of carbon. When old trees die or burn, they emit carbon through decomposition and smoke. Smaller, fast growing trees sequester carbon at a faster rate and are also important for long-term carbon storage. Future forest management must account for the full carbon cycle and diverse forests across all age and size classes.
- A single, one-size-fits-all approach to managing mature and old growth forests cannot conserve mature and old growth forests given the ecological variables in play and the heterogeneity of the resource at issue. For example, the approach to managing western red cedar must be different than the management approach for eastern hemlock. The USFS should ensure that

management policies allow for the best available science for the wide variety of forest types and landscapes that are our National Forests.

- The health of our forests and the sustainability of old growth forests requires flexibility and a variety of management practices and tools. The addition of this amendment into forest plans should not negatively affect the ability of the USFS to use the tools at their disposal to address the forest management crisis facing our country, specifically uncharacteristically severe wildfires in our Western forests.
- Per the science from USFS Research Stations, the Forest Service must conduct vegetation management at much larger geographic scales (4 to 5 times greater) to restore forest health and promote resilience, which includes an ecologically appropriate abundance and distribution of mature and old growth forests as well as young, regenerating forests where those traits are not yet developed.
- 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 across different forest types.
- As the forest service amends all 128 land use plans, we believe addressing each plan at the unit level and utilizing other step-down processes will strengthen local decision-making authority for each National Forest unit as they develop site specific, scientifically sound, proposed standards and guidelines as directed through this national plan amendment process. For example, old growth stands on the coast of Oregon tend to need less active management than an old growth giant sequoia stand located in California. Addressing these plans at each unit level and considering the unique ecological values of each forest across the country will enable the best outcomes for the associated standards, guidelines, adaptive management strategy, and monitoring plan proposed within this Notice of Intent. Importantly, within this nation-wide framework, decisions about projects—and specifically management of areas that include old growth—should be made at the National Forest unit level.
- We support the intent of this amendment process to complement the USFS focus on wildfire rather than hinder it. As stated in the Notice of Intent, *“Given the key threat that rapidly changing wildfire disturbance pose to national forest ecosystems and watersheds and the old growth forests therein, this proposed action is intended to complement the departments continued focus on, funding, and implementation of the USFS Wildfire Crisis Strategy.”* We believe this national forest plan amendment process provides an opportunity to increase the pace and scale to actively manage for healthy forests and complement USFS watershed restoration work, as well as work outlined in the Wildfire Crisis Strategy and other strategic plans.
- The old growth inventory and analysis of threats completed by the USFS found that mortality from wildfires is currently the leading threat to mature and old growth forests, followed by insects and disease. We support management efforts focused on science-based restoration and wildfire treatments that reduce the risk of uncharacteristic wildfire in mature and old growth as well as other forest types.

- 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 (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 improve our scientific understanding of holistic forest health, save countless hours, and millions of dollars which are important components to reverse the declines for Species of Greatest Conservation Need.
- We support the USFS plan to establish a 'National Old-Growth Monitoring Network' to inform, evaluate, and implement the effectiveness of the plan amendments that result from this process. We encourage the USFS to carefully evaluate how to adaptively manage old growth and other forest types across dynamic landscapes where stand level replacement events are increasingly common. Stand replacement disturbance events in old growth can create wildlife habitat, and efforts should be made through adaptive management to recruit old growth in different areas of the forest.
- We support the recent advancements and expanded federal authorities and funding for the USFS to work closely with conservation partners, states and private landowners to restore forest and watershed health through programs such as Keystone Agreements/Shared Stewardship Authority, Good Neighbor Authority, the Water Source Protection Program, Permit Streamlining opportunities in the 2018 Farm Bill as well as opportunities provided through both the Inflation Reduction Act and the Bipartisan Infrastructure Law. These programs should be utilized and expanded to help fund and implement Forest Plan goals and the goals of these plan amendments.

Conclusion:

Thank you for the opportunity for the sporting community to provide these comments in response to the Forest Service's proposed national old growth forest plan amendments. 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 rulemaking process.

Sincerely,

American Fly-Fishing Trade Association

American Woodcock Society

Angler Action Foundation

Archery Trade Association

Association of Fish and Wildlife Agencies

Backcountry Hunters & Anglers

Boone and Crockett Club
Delta Waterfowl
Fly Fishers International
Izaak Walton League of America
Montana Wildlife Federation
Mule Deer Foundation
National Bobwhite and Grassland Initiative
National Deer Association
National Wild Turkey Federation
National Wildlife Federation
New Mexico Wildlife Federation
New York State Conservation Council
North American Falconers Association
North American Grouse Partnership
North Carolina Wildlife Federation
Orion: The Hunter's Institute
Pheasants Forever
Pope & Young
Quail Forever
Ruffed Grouse Society
Theodore Roosevelt Conservation Partnership
Trout Unlimited
Union Sportsmen's Alliance
Wildlife Management Institute
Wildlife Mississippi
Whitetails Unlimited