

July 20, 2023

Christopher French, Deputy Chief  
United States Forest Service  
1400 Independence Ave  
Washington, DC 20250

**RE: Hunt-Fish Comments USDA ANPR on USFS Climate Resilience Management**

Dear Deputy Chief French:

The below signed hunting, fishing, and wildlife conservation organizations and professional societies work to advance the interests of millions of American hunter and anglers. We write to provide input on the U.S. Forest Service Advance Notice of Proposed Rulemaking (ANPR) to inform potential agency actions to “adapt current policies to protect, conserve, and manage the national forests and grasslands” for climate resilience, ecological integrity, and social and economic sustainability.

The nation’s 193 million acres of national forests and grasslands are of utmost importance for providing habitat for numerous fish and wildlife species 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. We encourage you to consider our recommendations to ensure that vital habitats for these species are maintained and improved over time—supporting ecosystem resilience and opportunities for future generations to enjoy our public lands.

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

- Promoting forest diversity—a shifting mosaic of young, middle-aged, and old forest across landscapes—is imperative to manage for climate resilience. To do so, we must view forests as dynamic collections of equally important seral states. Climate resilience, carbon optimization, and biodiversity are maximized when many forest ages are interspersed across landscapes, from young forests to old growth. Humans are major ecological players and have been for thousands of years. Science and professional experience tell us that humans must continue to play an active role in stewarding many natural systems.
- There is broad agreement that forest management is necessary to reduce risks posed by wildfire, optimize carbon outcomes, improve wildlife habitat, safely restore fire to fire-adapted forests, and restore impaired ecosystems. The challenge is how to manage these landscapes at the scope and scale to address the increasing need. Most of the forest projects undertaken today are restoration projects that address climate resilience by design. However, the environmental review processes can take years, and often is plagued by litigation. We encourage the Forest Service to exercise its existing NEPA authority to identify categories of restoration actions that do not individually or cumulatively have a significant, deleterious effect on the human environment and therefore do not require either an environmental assessment, or environmental impact statement. Doing so will help avoid multi-year NEPA processes, avoid litigation, and realize advancement toward climate resilience.
- Accomplishing climate resilience in our forests also requires local capacity to do the work. Many national forests exist within a matrix of underserved communities (Climate and Economic Justice

Screening Tool). A restoration economy could strengthen these same communities by creating family-supporting jobs in the forestry, forest products, and restoration sectors. The Forest Service can facilitate social and economic stability by investing in projects that improve forest and watershed resiliency while also ensuring a steady supply of wood fiber from national forests. Failure to do so results in the loss of workforce capacity, mill closures, and stressed economic conditions that hit rural communities especially hard. Fortunately, unprecedented funding is available to invest in workforce development, watershed and forest health, and mill infrastructure, connecting these vital aspects with the need to harvest wood from restoration projects. The Forest Legacy Program, wood innovation grants, etc. should be laser focused on bridging the gaps between forest restoration for climate resilience and local economies.

- Close collaboration with partners and formal agreements (i.e., Challenge Cost Share, Shared Stewardship, Good Neighbor Authority, etc.) are necessary to expand unit capacity. Policy and guidance should reflect the importance of such partnerships with output metrics reflecting the number and scope of co-stewardship agreements that support climate resilience both within and across national forest boundaries.

- Policy and processes are necessary that recognize and facilitate forest management to optimize forest and watershed resilience, carbon stewardship, fish and wildlife habitat, and all co-benefits. The framework basis exists. The 2012 Planning Rule provided an adaptive process and mandated an ecological reference model to evaluate ecological integrity. Natural Range of Variation (NRV) establishes ecozone (i.e., forest type) specific ranges of forest seral classes based on the best available science of forest conditions as a baseline. The NRV framework establishes spatial and temporal variation in those conditions based on natural disturbance, within a period of time and geographic area appropriate to a stated goal. A related concept, Historical Range of Variation (HRV), also incorporates historic human disturbance (i.e., Indigenous land-use) with ecological characteristics appropriate for a given management application.

Combined, the NRV and HRV provide a useful baseline for understanding forest characteristics *and* their variation across community types, site productivity, and geographic regions. Because NRV and HRV are adaptive to spatial and temporal variation, they can accommodate changes in forest composition over time whether from climate, disturbance events, or management. Further, NRV and HRV can capture this information for every seral stage. NRV and HRV help establish ecozone-specific desired conditions for forest seral stages on National Forests to maintain ecological integrity, including for young, middle-aged, open, late-seral, and old-growth forest conditions. Establishing these desired conditions based on the best available science ensures that our forests have a balanced portfolio of seral classes, and that one condition is not managed at the expense of others.

- There are many stressors that will make Eastern forests more vulnerable over time to climate change. These include invasive species, forest pests, changes in precipitation patterns, growing season fluctuations, changes in snowpack, reduced windows for frozen ground conditions and increased exposure to flooding and drought. The vulnerabilities, exposure and impacts on adaptive capacity will vary across forest types, ecosystems, and geographies. As such, there must be prioritization of ecosystem restoration work along with wildfire mitigation. Planning tools are available for forest managers. Time is of the essence and transitioning to the implementation phase is necessary. In the East, climate resilience has been incorporated into many State Forest Action Plans and State Wildlife Action Plans providing regional and cross-jurisdictional insights. Where climate resilient management approaches are

incomplete, the Forest Service should work with state agencies to incorporate current information available through the Forest Service R&D (i.e., Hoover and Smith 2023). We also recommend aligning and incorporating adaptation and climate-smart forestry tools and resources with the objectives and targets established in Forest Plans, State Forest Action Plans, State Wildlife Action Plans and State Climate Action Plans. These tools and resources include the Northern Institute of Applied Climate Science Adaptation Workbook, Research Station Tools (NIACS), USDA Forest Service Climate Adaptation Plan, USDA Action Plan for Climate Adaptation and Resilience (Adaptation #3), Tree Atlas (NRS), FVS climate extensions, SILVAH, REGEN 3, and Forest Plans.

- Ecologically appropriate management and restoration practices should promote diversity of forest stand ages across the landscape, including late and early successional forests that are representative of both short and long-term historical disturbance frequencies. 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. Implementing science-based, landscape appropriate strategies will optimize both the carbon storage and carbon sequestration potential of millions of acres of the nation's federal forests.
- Some National Forests are already appropriately using NRV to manage and conserve old-growth and mature forests as well as other important seral stages and forest structural conditions. For example, as part of its proposed Forest Plan revision, the Nantahala and Pisgah National Forests use NRV to quantify the desired extent of old-growth and mature (late) seral stages as well as young and open seral stages and structures. The NRV framework provides a floor and ceiling of the desired extent of seral classes to attain and maintain ecological integrity for a National Forest unit. The Forest Plan for the Nantahala and Pisgah National Forests established Forest-wide targets of 6-9% young forests, 36-48% open forests, and 57-73% mature forests (including 43-56% old growth forests) as terrestrial wildlife habitat conditions across ecozones. We support USFS guidance indicating all Forest Plans incorporate NRV, and as indicated above HRV, in the management of forest health, old-growth and mature stands, and other important seral stages within a forest unit.
- Wildlife connectivity, especially as it pertains to ungulate migration corridors and other seasonal ranges, is of utmost importance to our community. Recent advancements in GPS technology have enabled wildlife professionals to pinpoint the locations of migrating wildlife within feet. Given the fidelity of ungulates in their seasonal migrations, researchers have been able to map the exact locations of migratory corridors and associated winter and summer ranges necessary for maintaining wildlife abundance. Maintaining these migratory habitats and connectivity on the landscape—in close partnership with states and Tribes—is critically important in supporting the ability of wildlife to adapt to changing conditions on the landscape, including drought, wildfire, and increased human recreation.
- The USFS should continue to utilize the Watershed Condition Framework (WCF) to identify, prioritize, and implement habitat conservation and restoration activities that enhance climate resilience, including aquatic ecosystems. The USFS launched the WCF in 2010 to establish a nationally consistent approach to assessing watershed conditions and prioritizing watershed restoration on national forests and grasslands. The WCF process involves classification of watershed conditions/stressors, development of a watershed

restoration plan, and implementation, which includes monitoring and tracking accomplishments. By many accounts, the WCF has been a successful tool to support implementation of priority watershed restoration activities. However, more work is needed to strengthen WCF and integrate the restoration planning process with broader USFS programming and priorities. We encourage the USFS to take steps to strengthen WCF as a climate resilience tool, including supporting additional engagement with partners on the development and implementation of restoration action plans; directing local units to utilize WCF to prioritize climate-resilience projects such as wet meadow restoration in priority watersheds; further integrating watershed restoration action plans as components of broader-scale Collaborative Forest Restoration Landscape and Joint Chief project proposals; and setting aside more internal resources and capacity to scale implementation of the WCF.

- Forest Health and watershed health are inextricably connected. Activities to restore forest health should also be accompanied by actions that improve the resiliency of aquatic habitat. Increasing connectivity (e.g., replacing undersized culverts) and addressing existing aquatic habitat degradation and impairments will help to mitigate the short-term effects of forest management activities, lessen wildfire impacts, and help to build long-term resiliency of fish populations. Moreover, in watersheds with healthy, intact habitat, the benefits of treatment must be weighed against the risk of introducing new habitat stressors (e.g., erosion from roads, invasive species).

Thank you for your consideration of our input on the management of national forests and grasslands. We hope that these recommendations help the agency as it considers future management direction of public lands.

Sincerely,

American Woodcock Society

Angler Action Foundation

Archery Trade Association

Backcountry Hunters & Anglers

Fly Fishers International

Izaak Walton League of America

Minority Outdoor Alliance

Mule Deer Foundation

National Bobwhite and Grassland Initiative

National Deer Association

National Wild Turkey Federation

North American Grouse Partnership

Orion, the Hunter's Institute

Pheasants Forever

The Property and Environment Research Center

Quail Forever

Ruffed Grouse Society

Theodore Roosevelt Conservation Partnership

Trout Unlimited

Whitetails Unlimited

Wild Salmon Center

Wildlife Management Institute