



September 20, 2024

Linda Walker, Director
Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System; Draft Environmental Impact Statement

Dear Director Walker,

On behalf of the Congressional Sportsmen's Foundation, we encourage the U.S. Forest Service to adopt Alternative 1, the no action alternative. Alternative 1 will avoid the further diversion of limited agency resources away from desperately needed science-based restoration work to address declining fish and wildlife habitat and forest health across the 193-million acres of National Forest System lands on which sportsmen and women rely for recreational access.

Founded in 1989, the Congressional Sportsmen's Foundation (CSF) is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus (CSC), the Governors Sportsmen's Caucus (GSC), and the National Assembly of Sportsmen's Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

America's more than 53 million sportsmen and women spend more than \$93.7 billion, support over 1.6 million jobs, and contribute \$119 billion to the U.S. Gross Domestic Product. Hunters and anglers depend on the National Forest System for recreational access to pursue their outdoor pastimes, and their use of federal public lands and economic contributions are dependent on healthy forests and productive fish and wildlife habitat, which should include a diversity of habitats and seral classes. Additionally, sportsmen and women in 2023 alone generated more than \$3.49 billion for conservation funding through the "user pays – public benefits" American System of

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Conservation Funding, which includes revenue generated from sporting licenses sold and manufacturer-level excise tax revenue through the Wildlife and Sport Fish Restoration Program. This funding supports, among other things, habitat stewardship and conservation management for game and nongame species carried out by state fish and wildlife agencies on National Forest System lands across the country through cooperating agreements.

In addition to our concern that this cumbersome process attempting to amend 121 land management plans in a short time frame will further constrain limited U.S. Forest Service staff and funding resources at a time when the agency is facing significant budget challenges, we have specific and significant concerns with all the other alternatives, including:

- Old-growth management and recruitment of mature forests to old-growth will be prioritized over other habitat needs, specifically young forests and other early seral habitats, to the detriment of wildlife, game and nongame. While old-growth has value, it is critically important for a range of forest age classes and habitats to be represented on the landscape to enhance biodiversity and support a wider range of species. Even if Alternative 2 is selected with the modified proposed action to develop an *Adaptive Strategy for Old-Growth Forest Conservation Strategy*, which would “recognize the role of other successional stages that are important for ecological integrity,” there is no assurance in the alternative to actively manage for a diversity of habitats. Instead, this seems only to attempt to satisfy the ecological integrity requirement of the 2012 Planning Rule without incorporating substantive requirements for restoration work.
- National Forest System units will continue to fail to meet the minimum goals for early successional habitats identified in their respective land management plans, which contributes to declining populations of a wide range of game and nongame species across the National Forest System. For sportsmen and women, this is particularly concerning because one, we are conservationists and invest in the stewardship of fish and wildlife resources, and two, angler and hunter experiences and the recruitment of the next generations of sportsmen and women is supported by quality habitat and healthy fish and wildlife populations.
- The National Forest System will continue to trend towards a predominately older age class distribution. Given the 24.7 million acres old-growth and 68.1 million acres of mature forests identified in the report, *Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management*, combined with the more than half of the National Forest System already in no or limited management areas – Wilderness, Wilderness Study Areas, Inventoried Roadless Areas, National Monuments, National Scenic Areas, etc. and plan-level

restrictive designations and management areas – our concern is with the lack of diversity of habitats.

- Resource managers will lose management flexibility and be unable to meet habitat diversity goals. Even with the allowances in Alternative 2 for proactive stewardship of old-growth, we are concerned that those projects will be stymied by objections and litigation, as we regularly see with proposed vegetation management projects even in management areas identified in land management plans for active stewardship, let alone in a management area adjacent to or in the viewscape of old-growth or reported old-growth or potential future old-growth.
- A top-down management approach is inconsistent with the local collaborative input intent of the 2012 Planning Rule. Specifically, we encourage you to consult with state fish and wildlife agencies as the primary managers of fish and wildlife resources and their respective State Wildlife Action Plans and state forestry agencies and their respective State Forest Action Plans.
- Several National Forests have recently revised their land management plans or are in the process of revising their land management plans. Initiating an amendment process would therefore be duplicative, and a waste of resources. It is not in the best interest of taxpayer dollars or partner resources to spend ten years revising a forest plan to then turn around and amend the same plan. We encourage the U.S. Forest Service to instead initiate land management plan revisions for the National Forest System units (the majority) that have not updated their forest plans since the adoption of the 2012 Planning Rule, in due consideration of the National Forest Management Act requirement to update forest plans at least every fifteen years.
- Recently approved habitat restoration projects or projects working through the NEPA process towards implementation will be held up. Moving forward with the proposed alternatives will likely lead the U.S. Forest Service to being bogged down with project objections and litigation further constraining limited resources and delaying much needed habitat restoration work.
- While the *Mature and Old-Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management* report identified wildfire, insects, and disease as the leading threats to old-growth forests, not timber management, the U.S. Forest Service is ignoring their own data and the on-the-ground resource needs to increase the pace and scale of restoration and invest in wildfire prevention efforts and is conversely undertaking the enormous task of amending 121 land management plans. Instead, we encourage the U.S. Forest Service to prioritize implementing the Wildlife Crisis Strategy,

increase the use of existing authorities, leverage partner resources, and support policy reforms to improve the health of the National Forest System.

In closing, CSF urges the U.S. Forest Service to adopt the no action alternative to conserve limited staff and funding resources. We encourage you to instead prioritize the restoration work needed to increase forest resiliency, reduce catastrophic wildfire risk, and improve fish and wildlife habitat and access for sportsmen and women. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "JWC", with a long, sweeping horizontal stroke extending to the right.

John Culclasure
Director, Forest Policy
Congressional Sportsmen's Foundation