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Northeast Forest Conservation Director

August 1, 2023

Jim Innes, District Ranger
USDA Forest Service
Saco Ranger District
33 Kancamagus Highway
Conway, NH 03818

Re: White Mountain National Forest Saco Ranger District Sandwich Vegetation Management Project

Dear Mr. Innes:

Thank you for allowing us to submit comments on the draft Environmental Assessment (EA) and Preliminary Finding of No Significant Impact for the Sandwich Vegetation Management Project.

RGS & AWS 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 Saco 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 Sandwich Vegetation Management proposal 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 Sandwich Vegetation Management 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. The Draft Environmental Assessment (EA) report's Page 7 Paragraphs 2 & 3 note that *"Site assessments and other data indicate that existing conditions in the Sandwich Habitat Management Unit do not meet Management Area 2.1 Habitat Composition and age class objectives described in the forest plan (pp. 1-20 to 1-21). Approximately 24 percent of the habitat management unit comprises a young age class, 76 percent is mature forest, and regeneration-age stands are limited or absent"*.

Page 10, Paragraph 2 states *"Commercial and non-commercial silvicultural treatments would occur within approximately 1,325 gross acres of forested stands on National Forest System lands in the Sandwich Habitat Management Unit (table 1; figure 2, figure 3, and figure 4), all within Management Area 2.1 lands. Of this area, approximately 648 acres would be treated"*. Ruffed Grouse Society & American Woodcock Society supports the Saco Ranger District's efforts to conduct a variety of even and uneven-aged silviculture treatments to work toward the Forest Plan's goals for natural range of variation (NRV) for a variety of species and age classes.

Page 11, last 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 Saco Ranger District's commercial and non-commercial silvicultural work associated with the Sandwich Vegetation Management 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. We would like to schedule a conversation soon to clarify how we can help the Saco Ranger District implement the Sandwich Vegetation Management Project.

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 Sandwich Vegetation Management 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

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For more information visit the RGS & AWS website at RuffedGrouseSociety.org. Follow us on Facebook and Instagram @RuffedGrouseSociety.