

Greenville, ME February 2, 2024

Northampton, MA  
Alexandria, NH  
Bretton Woods, NH  
Director, Ecosystem Management Coordination  
201 14th Street SW, Mailstop 1108,  
Washington, DC 20250–1124

Gorham, NH  
Blairstown, NJ  
Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Haverstraw, NY  
New York, NY  
Bethlehem, PA  
Director –

These comments on the initial scoping period for the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System are submitted by the Appalachian Mountain Club (AMC). We understand that this scoping period is in advance of the preparation of an environmental impact statement to evaluate the effects of amending the 128 land management plans of the US Department of Agriculture – Forest Service.

The AMC is the oldest conservation and recreation organization in the country, with close to 90,000 members from Maine to Virginia. As a partner of the US Forest Service, we have an interest in protecting and enhancing both the recreation and conservation values of the White Mountain National Forest (WMNF) and other areas of the Appalachian region. The AMC was an active participant in the development of the 2005 Land and Resource Management Plan for the White Mountain National Forest and has supported the Plan since its adoption. The AMC also has practical experience in actively managing 130,000 acres of our own forested lands in northern Maine aimed at restoring late-successional conditions through a combination of reserves and conservative timber management. We strongly support the general intent of the preliminary proposed action and believe that restoring natural old growth forest conditions should be a priority for National Forest management.

Preliminary proposed actions outlined within the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System recognize the unique forest conditions and management objectives for each of the 128 land management plans within the United States Forest Service. Given the wide range of conditions across the country, AMC supports this forest-by-forest approach versus “one size fits all” approach. Regional plan adaptability, public outreach, and local planning feedback from Forest Service partners will allow for the individual assessment of management plans and for the best adoption of proposed amendments to allow for the retention and development of old growth and mature forest conditions. The adaptability of this order is crucial for developing climate resilient old growth or mature forests across our National Forest system.

Our comments address several areas of the preliminary proposed action as pertaining to the White Mountain National Forest (WMNF) including:

- 65% of WMNF lands are already set aside from timber harvesting and are moving toward late-successional and old growth conditions through natural forest succession.



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- Timber management on the WMNF aims towards developing and maintaining mature forest conditions, though some areas of younger forest are created for wildlife or silvicultural purposes. The current management direction is generally consistent with the proposed new rule. These forest type distinctions are critical as some types---such as the northern hardwoods and spruce-fir on the WMNF---are very amenable to active management for restoration and maintenance as “managed late-successional” and old forest conditions. Other forest types may require some level of active management to restore resilient conditions, and some may best achieve old forest status by being left alone.
- Sustainably harvested wood products from the WMNF supply needed products to the region and contribute to the local forest economy’s contractors and mills. AMC has experience with forest management and timber harvesting on our ownership in northern Maine and recognizes the value of wood products as a renewable resource and economic driver in rural northern New England.
- AMC believes the amendment should allow for the continuation of the current level of harvesting on the WMNF, while maintaining or enhancing the focus on managing for mature forest conditions. The WMNF is one of the land managers practicing the type of ecological forestry that AMC would like to see more widely adopted.
- Current forest management of the WMNF provides regional ecological benefits by increasing carbon storage through conservative timber management while retaining large sections of the forest as natural areas. AMC believes this directive should allow for the balance to be maintained in future management.
- AMC recognizes that ecological restoration and old-forest management will often conflict with economically efficient timber production. In its approach to this tension, the US Forest Service should prioritize ecological restoration and mature forest conditions to provide broad public benefits.

Thank you for the opportunity to provide these AMC comments on this preliminary proposed action.

Sincerely,

Heather Clish  
Vice-President for Conservation & Recreation Advocacy  
Appalachian Mountain Club