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Comments: Christopher French

Deputy Chief

National Forest System

US Forest Service

Tracy Stone-Manning

Director

Bureau of Land Management

SUBJECT: NCWRC input on USFS and BLM ROI on Federal Old-growth and Mature Forests

Dear Deputy Chief French and Director Stone-Manning:

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the US Forest Service (USFS)'s and Bureau of Land Management (BLM)'s request for information (ROI) on federal old growth and mature forests. The NCWRC is charged by statute with management, regulation, protection and conservation of wildlife resources and inland fisheries in North Carolina (General Statute 113-132). The NCWRC's mission includes conserving North Carolina's wildlife resources and their habitats.

NCWRC staff assists the USFS in assessing and managing wildlife resources on Forest lands and are familiar with the ecology, structure, and composition of old growth forests in North Carolina. We offer the following input on specific questions outlined in the ROI:

1. What criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for planning and adaptive management?

[bull] Structural and compositional characteristics are representative of the forest type (ecozone) for which the forest occurs

[bull] Occurs at amounts and distributions within its Natural Range of Variation

[bull] Is subject to regular disturbances indicative of the disturbance regime for the forest type (ecozone) in which it occurs

[bull] Is capable of regenerating/ growing trees and other vegetative strata indicative of the forest type (ecozone) in which it occurs

[bull] The presence/ abundance of species that utilize habitats provided by [ldquo]old growth[rdquo] forest structures

2. What are the overarching old-growth and mature forest characteristics that belong in a definition framework?

[bull] Occurs in amounts and distributions in line with Natural Range of Variation

[bull] Quality conditions including structure, composition, forest health, and juxtaposition

[bull] Cohorts of older/ mature age classes of trees

[bull] Functionality/ Resiliency

[bull] Provides a diversity of structure, composition, and juxtaposition across the landscape as a whole

[bull] Un-even aged classes

3. How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site productivity and geographic region?

[bull] There is an inordinate need for forest type (ecozone)-specific criteria or parameters for [ldquo]old growth[rdquo] classification. These criteria should account for age, disturbance regimes, structure, composition, and juxtaposition.

[bull] Recognition that conditions are spatially temporal and not a static or an end state.

4. How can a definition be durable but also accommodate and reflect changes in climate and forest composition?

[bull] Climate change does not occur in a vacuum and affects different forest types (ecozones) differently. Therefore, flexibility to manage and classify [ldquo]old growth[rdquo] by forest type is greatly needed. Over-arching [ldquo]old growth[rdquo] guidance can fail to include the nuances of management within the context of a diverse landscape.

5. What, if any, forest characteristics should a definition exclude?

[bull] Vegetation size and height

Thank you for the opportunity to provide input on the federal definition of old growth and mature forests. Please contact me at (919) 707-4055 or david.cox@ncwildlife.org if I can provide any further assistance. Sincerely,

David R. Cox, Supervisor

Habitat Conservation Division