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Comments: Please see the comment letter from North Carolina Wildlife Resources Commission.

Acting Director Linda Walker Ecosystem Management Coordination 201 14th Street SW Washington, D.C.

20250 SUBJECT: Scoping Notice for Land Management Plan Direction for Old Growth Forest Conditions across the National Forest System

Dear Director Walker: Biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the US Forest Service (USFS)'s scoping notice for Land Management Plan Direction for Old Growth Forest Conditions across the National Forest System. 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 land throughout North Carolina and are adeptly familiar with the ecology, structure, and composition of old growth forests in the state. We previously provided input on the Request for Information on federal old growth and mature forests in 2022. In the current proposal, the US Department of Agriculture (USDA) proposes to amend all land management plans to establish consistent direction for old growth forest conditions across National Forest system lands. Each land management plan would be amended to include a statement of roles and contributions, one goal, one management approach, four desired conditions, one objective, four standards, one guideline, and plan monitoring requirements. The intent of the proposal is to support long-term resilience of old growth conditions. We offer the following input on the current proposal: The development of a national direction for old growth forest management runs the risk of boxing geographically and ecologically distinct forest types into a "one size fits all" management and classification strategy. As is the case with all successional or seral classes, old growth forest should occur in amounts and distributions across the landscape which are in line with its Natural Range of Variation. Old growth should contribute to and occur in consideration of the diversity of forested conditions across not only federal lands but in context to other adjacent lands as well. This includes considerations of their structural and compositional characteristics which should be representative of the forest type (or ecozone) in which it occurs. Additionally, old growth should be subject to regular disturbances as ecologically appropriate to ensure forest function, continued resilience, and contribution to the diversity of available habitat conditions for the benefit of wildlife. The National Forests of North Carolina have experienced extensive management by humans, especially in the last 400 years. They are highly diverse - from the coastal plain forests of the Croatan National Forest (NF), to the rolling piedmont forests of the Uwharrie NF, to the sprawling 1.1 million-acres of land of the Nantahala-Pisgah NF in the Appalachian mountains. Ecologically responsible management of old growth forest in these forests requires very different approaches for each NF, given the differences in land use history, forest types, climate, soils, elevation, and more. Requiring a common set of plan components in the forest plans for each of these NFs would need to be so general and over-arching that it would limit or remove recurrent plan specificity and threaten to make plan direction less applicable and appropriate. This issue is compounded if considering that a common set of plan components could be developed for all NFs across the National Forest system. Considering the immense diversity of forest types and settings, we are concerned that a common set of plan components would be either overly restrictive or so general that they would provide no meaningful direction for local decisions or be effectively incorporated at the project level. The Nantahala-Pisgah Forest Plan (NPFP) was finalized in 2023 and was developed through an extensive collaborative process involving a broad range of stakeholders, resulting in a plan that balances the interests of many users. NCWRC was an active participant in this collaborative process for nearly 10 years, and we worked closely with the USFS to share data and ideas for plan elements and direction. This plan provides distinct ecological restoration goals, such as to restore woodland, young forest, and aquatic habitats, to bring more prescribed fire onto the landscape, and to protect and restore rare habitats and species. The plan's approach to old growth forest management is broadly integrated throughout the entire plan and spelled out through a robust set of plan components and long-term targets for old growth forest which are informed by Natural Range of Variation. The plan proposes a strategy to foster and balance forest types (determined by age classes,

composition, and structure) across the landscape so that wildlife-dependent habitats such as old growth, woodland, and young forest are present and thriving at ecologically appropriate proportions. The NFP's approach to old growth is a compromise position, achieved by balancing the needs of the Forest and the interests of stakeholders. NCWRC was supportive of the overall old growth strategy presented in the Plan. The Plan's old growth network spans all ecozones and focuses on providing for larger old growth patches over small patches. This approach allows the USFS to manage old growth on a larger scale without getting bogged down with small patch analysis at the project level, which can be very time-consuming and controversial. It is our concern that the current federal directive could unnecessarily require the USFS to revise this carefully considered strategy. For example - a laborious old growth analysis required at the project level would needlessly slow down projects and exacerbate project costs and investments of both NCWRC and USFS staff time which are already strained and limited. This also raises the major question as to whether the NFP's nuanced approach to old growth and its ecosystem-based approach to old growth management would have to be reworked in order to accommodate changes that would be required to meet federal guidelines. We are concerned that collaboratively developed plans such as the NFP will be reopened and changed to incorporate new national-level old growth direction with no benefit. Currently, it does not appear that this directive will include a broadly supported collaborative process specified by the 2012 planning rule and thus may result in changes that are not supported by stakeholders. NCWRC is not supportive of any proposal that could upend the carefully balanced approach currently in place to meet old growth needs of various ecozones within the NFP. This ultimately could be to the detriment to all forest types and condition classes where there is a dire need for expansion and/or restoration. Across North Carolina this would include conditions such as open woodland and young forest types within pine-oak heath, dry oak, shortleaf pine-oak, shortleaf pine, and longleaf pine ecosystems, to name a few. The NCWRC and the USFS have a special partnership in North Carolina. The NCWRC manages the lands of the National Forests of North Carolina within our Game Land network. Game Lands are managed for public hunting, trapping, fishing, and other wildlife-associated recreation. Management is implemented to benefit both rare and common species and habitats. NCWRC's 2015 Wildlife Action Plan, a comprehensive planning tool to conserve and enhance the state's aquatic and terrestrial wildlife species, spells out specific actions and management approaches that are needed to conserve North Carolina's wildlife; many of these actions and approaches are achieved within our Game Land network, of which the majority is comprised by National Forest lands. A substantial amount of the wildlife management activity that is done across the National Forests of North Carolina is implemented by NCWRC. We coordinate closely and work with our USFS partners to achieve meaningful on-the-ground restoration and enhancement of wildlife resources. It is unclear what impacts this national old growth directive may have on this relationship and the important management work that the NCWRC implements for both wildlife and wildlife-based recreation. Thank you for the opportunity to provide input on plan direction for old growth forest conditions on USFS lands. Please contact me at (919) 707-0089 if you have any questions about these comments. Sincerely, ATTACHMENT:  
NCWRC\_ScopingNoticeforOldGrowthForest\_USFS\_Jan26 2024.pdf is letter content.