

Data Submitted (UTC 11): 1/26/2024 5:00:00 AM

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

Acting Director Linda WalkerEcosystem Management Coordination201 14th Street SWWashington, D.C.

20250SUBJECT: Scoping Notice for Land Management Plan Direction for Old Growth ForestConditions across the National Forest SystemDear Director Walker:Biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewedthe US Forest Service (USFS)'s scoping notice for Land Management Plan Direction for OldGrowth Forest Conditions across the National Forest System. The NCWRC is charged bystatute with management, regulation, protection and conservation of wildlife resources andinland fisheries in North Carolina (General Statute 113-132). The NCWRC's mission includesconserving North Carolina's wildlife resources and their habitats.NCWRC staff assists the USFS in assessing and managing wildlife resources on Forest landsthroughout North Carolina and are adeptly familiar with the ecology, structure, and compositionof old growth forests in the state. We previously provided input on the Request for Informationon federal old growth and mature forests in 2022.In the current proposal, the US Department of Agriculture (USDA) proposes to amend all landmanagement plans to establish consistent direction for old growth forest conditions acrossNational Forest system lands. Each land management plan would be amended to include astatement of roles and contributions, one goal, one management approach, four desiredconditions, one objective, four standards, one guideline, and plan monitoring requirements. Theintent of the proposal is to support long-term resilience of old growth conditions. We offer thefollowing input on the current proposal:The development of a national direction for old growth forest management runs the risk ofboxing 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, oldgrowth forest should occur in amounts and distributions across the landscape which are in linewith its Natural Range of Variation. Old growth should contribute to and occur in considerationof the diversity of forested conditions across not only federal lands but in context to otheradjacent lands as well. This includes considerations of their structural and compositionalcharacteristics 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 toensure forest function, continued resilience, and contribution to the diversity of available habitatconditions 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 theCroatan National Forest (NF), to the rolling piedmont forests of the Uwharrie NF, to thesprawling 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 verydifferent 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 foreach of these NFs would need to be so general and over-arching that it would limit or removecurrent plan specificity and threaten to make plan direction less applicable and appropriate. Thisissue is compounded if considering that a common set of plan components could be developedfor all NFs across the National Forest system. Considering the immense diversity of forest typesand settings, we are concerned that a common set of plan components would be either overlyrestrictive or so general that they would provide no meaningful direction for local decisions orbe effectively incorporated at the project level.The Nantahala-Pisgah Forest Plan (NPFP) was finalized in 2023 and was developed through anextensive collaborative process involving a broad range of stakeholders, resulting in a plan thatbalances the interests of many users. NCWRC was an active participant in this collaborativeprocess for nearly 10 years, and we worked closely with the USFS to share data and ideas forplan elements and direction. This plan provides distinct ecological restoration goals, such as torestore woodland, young forest, and aquatic habitats, to bring more prescribed fire onto thelandscape, and to protect and restore rare habitats and species. The plan's approach to oldgrowth forest management is broadly integrated throughout the entire plan and spelled outthrough a robust set of plan components and long-term targets for old growth forest which areinformed by Natural Range of Variation. The plan proposes a strategy to foster and balanceforest 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 NPFP'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 NPFP'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 NPFP 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 NPFP. 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.