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Title: Asst. State Forester-Forest Mngt. & Development

Comments: Re: North Carolina Forest Service Comments on proposed Old Growth Management

Directive Documentation Citation: 88 FR 88042; Document Number: 2023-27875 Notice of Intent to prepare an environmental impact statement

Dear Sir or Madam: The North Carolina Forest Service (NCFS) appreciates the opportunity to respond to the United States Department of Agriculture (USDA) Forest Service Notice of Intent (NOI) to prepare an environmental impact statement (EIS) to amend all land management plans for units of the National Forest System to include consistent direction to conserve steward and recruit future old-growth forest conditions. Although the NCFS does not manage National Forest woodlands, our organization has very close working ties with our North Carolina-based U.S. Forest Service leadership and staff. We have a history of positive collaboration on natural resource matters such as but not limited to wildfire control; water quality protection; invasive species control; storm response; and staff training. North Carolina has had successful Good Neighbor Authority agreements; Joint Chiefs project implementation; and North Carolina Forest Action Plan partner discussions. We are very invested in how North Carolina's National Forests are managed, as they have significant impacts on our citizens, environment, economy, and lands beyond their property lines. We respectfully offer the following comments as they relate to the old growth directive being considered:

A. Recognition of old growth importance: The North Carolina Forest Service recognizes the value of old growth forests, and in particular, the role that our National Forests play in ensuring these forest age classes are part of our landscape. We agree that special consideration should be given to this topic during the management planning process. National Forests should not be managed with old growth class maintenance and recruitment objectives as the only/over-riding criteria, but we believe it should carry weight when developing a balanced management approach. This is particularly true in states where adjacent private woodlands tend to have notably younger stand classes as the norm.

B. Importance of local & state-level stakeholder collaboration: Our National Forests are the source of numerous environmental and societal benefits. Balanced, scientifically based management is often challenging as meeting some resource objectives may directly conflict with meeting other objectives. Diverse local and state-level stakeholder input and collaboration is a critical component in the management planning process. North Carolina has four National Forests (Nantahala; Pisgah; Uwharrie; and Croatan). The Nantahala and Pisgah National Forests make up a large percentage of western North Carolina. The North Carolina Forest Service and many other stakeholders worked diligently between 2014 -2023 to provide input and advice as the Nantahala - Pisgah National Forest Management Plan was revised. Reference the four attached letters (dated 2014; 2020; and 2022) from the North Carolina Forest Service and North Carolina Department of Agriculture & Consumer Services that accompany this comment letter. These outline detailed inputs and recommendations for the revised National Forest Management Plan. A large number of additional diverse stakeholders were also "at the table". This stakeholder process took a very long time to finalize, but we believe the revised Nantahala - Pisgah National Forest Management Plan offers a balanced approach in meeting the many multiple resources objectives. This includes the identification and intentional management of an old growth network across the Forests that should ensure sustainable age class management moving forward. This is only one example of a National Forest Management process and plan potentially affected by this directive, but it is a very applicable and notable example for our State.

C. Use of top-down organizational directives: We understand and respect the need for occasional "top-down directives". There are times when North Carolina Forest Service leadership provides such guidance in order to communicate points of emphasis and ensure consistency. That being said, we recommend the proposed old growth directive be used to "steer" the management of our National Forests but that they not replace or supersede National Forest Management Plans that already address old growth management in a responsible and proactive manner. Federal directives that replace local and state-level partnership approaches will likely undermine balanced approaches that work for that National Forest in that particular State, resulting in diminished stakeholder trust and undesirable forest conditions. Our final comment associated with Washington, DC-based Administration Directives is they have the potential to create a "see saw" environment that makes responsible management of our National Forest lands even more difficult. The scenario

of ever-shifting mandates with each new Administration could wreak havoc with the implementation of long-term National Forest Management Plans. In the case of old growth management, we recommend sustainable, still be "living with the Forest" long after the current Administration leaves office. This would also help create reasonable management of our old growth that complements the Forests' other resource objectives ... vs. one that shifts from "little protection" to "absolute protection" as Administrations come and go. D. Need for balanced active forest management: Maintenance and recruitment of old growth stands is an important resource objective for our National Forests. There may be other significant resource objectives that may need to be considered, ultimately calling for some compromises. Examples could include but are not limited to increasing forest health and resiliency; replacing certain species in order to restore species of concern on the landscape; and diversifying overall Forest stand age class inventories. In the previously-cited example of the Nantahala - Pisgah National Forest, one of the primary challenges is the overall lack of early successional habitat. Active forest management to address and meet such objectives that are not old growth-centric may be warranted and reasonable components to factor in when determining the future conditions of a given stand. E. Inventory & resource assessment: In order to responsibly manage our old growth forests, National Forest staff must first accurately understand forest inventories. We recommend robust resources (ex. funding; staff; use of technology) be provided to U.S. Forest Service managers so the foundation of their decisions originate from current and scientifically based data. We recognize the complexity and importance of old growth stand management on our National Forests, and appreciate the attention being given to the subject. Our hope is that National Forest staff have the ability to manage these lands in a balanced manner. This should include decision-making resulting in sustainable forest conditions that meet numerous resource needs that are not solely based on and limited by old growth criteria. Respectfully,

ATTACHMENT: NCFCS Comments-Old Growth Forest Directive 2-2-24 final signed.pdf - Comments copy/pasted to text box; coded/completed.

ATTACHMENT: 2020-6-23-NCFSCComments-NanPisgahForestPlans-final.pdf - N.C. Forest Service leadership comments on draft Nantahala and Pisgah National Forest Plan.

ATTACHMENT: Comments Nantahala and Pisgah National Forests Plan Revisions_4-28-14_Troxler.pdf - Comments regarding the Notice of Intent, the Preliminary Need for Change and the Proposed Action, published in the Federal Register on March 12, 2014 for the plan revisions for the Nantahala and Pisgah National Forests.

ATTACHMENT: NCFCS Comments Nantahala and Pisgah National Forests Revision Plans 4-28-14 Final.pdf - North Carolina Department of Agriculture and Consumer Services comments during the scoping phase of revisions to the Nantahala and Pisgah National Forest Plan.

ATTACHMENT: NCFCS Feedback-Nant Pisgah Proposed Plan 3-21-22.pdf - North Carolina Department of Agriculture and Consumer Services feedback as it relates to the proposed Nantahala & Pisgah National Forest Management Plan.