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Title:

Comments: I am not in favor of the current amendment as written. Local Management Plans, like the one we just finished for Pisgah and Nantahala National Forests, where I live, are a much more nuanced approach to preserving old growth forests and stewarding future ones. We have a plan in place to do so already, with YEARS of grassroots community engagement. We cannot have a national order threaten LMPs like ours that have already addressed the issue and will do so for another 10 years. I do think it is important to ensure LMPs include plans for old growth management that are scientifically sound for that region. I don't think the national level is the way to reach consensus on local biology, however. I wouldn't want foresters who were raised and worked in Oregon deciding how a far more biologically diverse Appalachian forest should be managed without intensive local input and experience, and vice versa. I think it makes sense to have some requirement for inclusion of old growth conservation and stewardship included in the next round of any forest LMP. Or provide a very clear waiver for LMPs that have undergone some level of scientific planning and local input in crafting their approach to old growth protection and cultivation. To be clear, I think forests with the degree of planning and public input akin to Pisgah and Nantahala National Forests should not be subject to this amendment at this time. However, I think there should be a broad requirement that future LMPs include a similar approach to that which Pisgah and Nantahala undertook. Furthering this example, I am personally very satisfied with the Pisgah and Nantahala plan's approach to old growth conservation and stewardship. I would hope that every forest would have a similar approach, and that is how I want the national amendment to be revised. I personally believe that the NCWRC did a great job summarizing concerns, so I have attached their comments, which largely mirror my own. Thank you for the opportunity to comment on this.

ATTACHED: NOGA draft EIS comments from the North Carolina Wildlife Resources Commission.