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September 20, 2024

Director, Ecosystem Management Coordination

201 14th Street SW

Washington, DC 20250

SUBJECT: Amendments to Land Management Plan to Direct Old Growth Forest across the National Forest System Draft Environmental Impact Statement

Dear Director:

The Fish and Wildlife Conservation Council (FWCC) has reviewed the draft Environmental Impact Statement for amendments to Land Management Plans to Direct Old Growth Forest across the National Forest System. Our grassroots council uses the US Forest Service in NC and the NC Wildlife Resources Commission,(NCWRC) as technical advisors on these issues. By using these professional resource managers and supplying local knowledge of forest, wildlife and traditional use cultures from our council, we consider our comments as high value.

FWCC was instrumental in helping form the Nantahala/Pisgah National Forest Plan completed in February 2023. We have been a trusted partner in these forest, supporting the goals of the Forest Service and the needs of the forest and wildlife. We continue to work closely with the agency and other partners to achieve goals for forest and wildlife health. Thank you for the opportunity to comment on this amendment.

## SCOPING :

While we appreciated the opportunity to comment in the scoping phase in early 2024, we were disappointed in the fact that it appears to have been rushed through. Clearly objectives for old growth was addressed in the Nantahala/Pisgah Forest Plan completed in 2023. The plan itself addressed the 2012 planning rule on ensuring all components of the forest was addressed. We feel that the scoping process should have identified those forest who had addressed OG under a collaborated plan and not subjected those plans to amendments. Scoping is more than just a process of moving forward but a tool to evaluate the question. Clearly any detail evaluation of the Nantahala Pisgah Forest Plan proves the plan goes much further than what the amendment offers for overall forest health. Our council feels a missed opportunity was made in the scoping process.

## Collaboration:

Our council realized in the infant stages of the Nantahala Pisgah Forest we had a generational opportunity to speak up for wildlife and the hunting culture in these forest. We participated from the beginning in assisting the Forest Service on putting together a diverse group of stakeholders representing broad range of user groups. It is our understanding this plan was unprecedented in terms of participation, length of development and probably cost.

Our concern is that the collaborative process clearly is undermined by a amendment that drastically changes this plan. Collaboration only works when trust is achieved. Our council spent 10 years as a grass roots unpaid participant. Many of the amendment changes directly effects our number one concern, wildlife habitat. As a collaborating partner after 10 years to only have 90 days, in reality a few weeks to meet with the resource managers and get our reports back out the our network built over 10 years was impossible. Voices that the Forest Service encourage to speak in building the plan are being left out during this fast tracked amendment. In turn the good will produced by the Forest Service thru its 2012 planning rule is at jeopardy.

## Partners:

Our council is part of several projects and proposed projects across both the Nantahala and Pisgah National Forest. We also recognize the other two National Forest in NC, the Croatan and Uwharrie as this makes up well over half of the public hunting land, NC Gamelands. Sportsmen and women support finically thru license and permits wildlife and habitat on these lands. The NCWRC is a cooperating agent on these forest and is funded thru license sales and the tax payers of NC. Our council and the NCWRC has invested thousands of hours and capital into a plan, projects and proposed projects on these National Forest in NC. Like collaboration, trust is essential in moving forward. In 2020, FWCC met with Seceraty of Agriculture, Chief of the USFS and Reginal Forester on just that, the importance of partnerships. Our region 8 has the most participating partners in the country. With the struggle of budgets it is partnerships that allow the USFS to do much of its work.

Our concern is that many projects on the books and time on the plan itself will be jeopardized. Partners come to the table in good faith , suddenly find the rules amended . When investments of time and money from partners are wasted , trust is quickly eroded. Trusted partners must have confidence in the USFS to value them and view how amendments effect those relationships.

Oversight:

We encourage the agency to review in house or external all the above concerns. We ask the same reviews in regards to the investments the USFS as made in the 2012 planning rule, proposed projects and other effects from this amendment. Budgets continue to be a huge issue for this agency. Many needed positions go unfunded along with projects. Capitol used to address this amendment and then the effects must be reviewed .

Closing:

We are attaching the comments from the NCWRC as our technical advisors . Our council values the science our resource managers provide and endorse their comments .

Regards,

David Whitmire

FWCC Chairman

North Carolina Wildlife Resources Commission

Cameron Ingram, Executive Director

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September 17, 2024

Director, Ecosystem Management Coordination

201 14th Street SW

Washington, D.C. 20250

SUBJECT: Amendments to Land Management Plans to Direct Old Growth Forests across the

National Forest System Draft Environmental Impact Statement

Dear Director:

Biologists and Foresters with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the US Forest Service (USFS)'s Draft Environmental Impact Statement (DEIS) for Amendments to Land Management Plans to Direct Old Growth Forests 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 work closely and assist the USFS in assessing and managing wildlife resources on National Forest lands 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 scoping notice for this effort in February 2024 and on the Request for Information on federal old growth (OG) and mature forests in 2022.

Through cooperative agreement, the NCWRC assists the USFS with the management of National Forests (NFs) in North Carolina (NC) as part of our network of public Game Lands.

The Agency's primary management objectives center on the creation and improvement of habitat for both rare and common species and providing opportunities for hunting, trapping, fishing, and other wildlife-associated recreation. Specific management actions on Game Lands that are also NF lands are informed by the NCWRC's 2015 Wildlife Action Plan, which is a comprehensive planning tool to conserve and enhance the state's aquatic and terrestrial wildlife species.

A substantial amount of the wildlife management activity that is done across the NFs of NC is implemented by the NCWRC. We coordinate closely and work with our USFS partners to achieve meaningful on-the-ground restoration and enhancement of wildlife resources. Currently it is unclear what impacts this national OG directive may have on this relationship and the important management work that the NCWRC implements for both wildlife and wildlife-based recreation.

In the current proposal, the US Department of Agriculture (USDA) proposes to amend most land management plans (LMPs) to establish consistent direction for OG forest conditions across NF system lands. Apart from seven National Grasslands, each land management plan would be amended to include a full suite of proposed plan components (goal, objective, management approach, plan monitoring, desired conditions, standards and guidelines). In addition, an Adaptive Strategy for Old Growth Forest Conservation (ASOFC) would be required, which would set quantitative goals for OG conservation, a method to measure progress toward reaching these goals, and a process to determine when or if the measurements indicate a need for change in management actions.

The NCWRC supports the conservation of OG forest conditions. We appreciate that the DEIS does not provide a prescriptive definition nor a single management strategy for OG, but instead acknowledges that there are significant differences in forest types across the US which require regional or local definitions, criteria, and management strategies. In our view, one of the biggest benefits of the NOGA may be that it provides guidance for management in OG forest, thus

promoting the use of active management where appropriate. In response to the request for comments we offer the following input:

1. NOGA (National Old Growth Amendment)

a. Concern over how the NOGA has been administered.

As a stakeholder agency with cooperating agency status, the NCWRC shares many of the concerns that other stakeholders have regarding the seemingly rushed timeline of the amendment. While the level of engagement for stakeholders to participate in the process has improved since scoping, given the significant implications such an amendment could have at a national level, it is disconcerting that there was not more targeted engagement prior to the release of the Notice of Intent (NOI). Although our agency was given the opportunity to provide input on identifying and defining OG characteristics, as was many other stakeholders, we felt excluded from discussions regarding the ecological and cultural impacts such an amendment could have on forest resources in our state.

b. Concern that a national amendment will significantly delay project implementation.

Given the projected timeline and expected implications of incorporating the NOGA, it will undoubtedly result in the postponement of planned and needed projects over the next 2-15 years. As stressors such as wildland fire and disease pose immediate threats to ecological integrity, even a few years of inaction could have drastic and significant unintended consequences on our nation's forests.

In addition, planning components related to the NOGA have not been carefully incorporated into or considered in conjunction with other existing LMP components. For this reason, we believe there is significant potential that implementing the amendment as proposed will necessitate the revision and adjustment of these plan components. This further increases the likelihood that plans will face greater incidents of stakeholder conflict, potential litigation, and increased implementation timeframes for projects.

c. Concern that the scale at which the amendment is being applied will not be nuanced enough to be effectively applied as required by the Planning Rule.

The 2012 Planning Rule specifies that the spatial scales of an assessment [ldquo]should be sufficiently large to adequately address the interrelationships between conditions in the plan area and the broader landscape, but not so large that these interrelationships lose relevance in guiding land management planning.[rdquo] The Planning Rule lists factors that can impact or influence the determination of the appropriate spatial scale that include the following: ecosystem characteristics (composition, structure, function, and connectivity), the economic value of resources and their commercial markets, disturbance regimes, as well as landform patterns or land type associations. Analyzing the effects of the NOGA at a national scale does not meet these criteria for an appropriate assessment nor does it provide a suitable rationale for doing so. Forest types across the US are immensely complex and diverse systems. In some cases, these complexities are difficult to understand and characterize at the planning level, let alone on a national level. This is demonstrated in several instances throughout the DEIS and the associated analysis. One particularly concerning example is the consolidation of the 200 identified [ldquo]Regional Old-growth Vegetation Types[rdquo] into 80 regional forest type [ldquo]groups.[rdquo] In some cases, a vegetation type itself is considered a distinct vegetative group. However, in most cases, numerous types were compiled to form a single group. While it makes sense that consolidating forest types into groups would [ldquo]allow for more robust estimates[rdquo] as the DEIS analysis states, doing so ignores the intricacies of the vast diversity of forest types across the nation and requires those intricacies to be removed at some level for the amendment to be practical and rationally analyzed.

Specific to NC and Region 8, the consolidation of 27 vegetation types into one forest [ldquo]group[rdquo] (R8- Southern Hardwoods) has resulted in them not being adequately assessed in the analysis.

For example, the associated fire regime listed for the R8-Southern Hardwoods group is

[ldquo]frequent[rdquo]. Though this may be true for some mixed upland hardwood types, most types listed in the Southern Hardwoods group have relatively low fire frequency regimes. Within this consolidation, there are even some cases where the same vegetation type spans multiple Forest Service regions but has differing fire regime frequencies listed across those regions. Another example where the oversimplification of forest groups has occurred in the analysis is where Red Spruce is included with other Region 8 conifers such as Pitch Pine and Table Mountain Pine. These two vegetation types have vastly different fire and disturbance regimes from that of Red Spruce and occur in different topographical climatic conditions. These differences influence other primary factors of disturbance that effect their potential OG characteristics, such as insects, disease, and climate change.

d. Concern that the NOGA will ultimately force Forest Service Units to delineate stands with the inherent capability to provide OG forests outside of the general management area framework.

While a separate OG designation is not a requirement of the amendment, the requirement to prioritize and identify stands with the inherent capability (defined as the ecological capacity or ecological potential of an area characterized by the interrelationship of its physical elements, its climatic regime, and natural disturbances) to produce OG character ultimately requires Forest Service Units to delineate and define areas of the forest where OG character could potentially be a realized goal.

Similarly, when developing LMPs, NFs are required to develop an assessment of Suitable Lands for Consideration as Designated Wilderness, often referred to as the [ldquo]Wilderness Inventory.[rdquo]

While these areas have no special designation or consideration within the plan, because they are deemed potentially suitable for wilderness designation, they become increasingly controversial areas for consideration of management.

Given the vast amount of lands with the inherent capability to provide OG conditions, we



anticipate an analogous controversy, where those opposed to active forest management in these areas will try to use the amendment to stall and or halt the timely implementation of projects.

e. Concern that projects needed to diversify forest conditions will shift towards those favoring OG character and ultimately constrain resources and work in other successional forest classes or for other restoration priorities.

As Forest Service Units have finite resources and limited staff capacity to implement projects, we are concerned that the increased emphasis on projects directed towards managing and moving forests towards more OG could supersede projects that address more immediate needs that require active management for ecological restoration, fire mitigation, or important wildlife habitat conditions.

f. Concern that the amendment dismisses carefully and collaboratively developed LMPs such as that of the Nantahala and Pisgah NF, which just finished a plan revision.

Our agency is particularly concerned the NOGA would have disastrous effects on the collaboratively developed LMP for Nantahala and Pisgah NFs. This Plan was identified in the DEIS as being a [ldquo]Category 3[rdquo] LMP, which is [ldquo]likely to experience noticeable change[rdquo] through

the OG amendment. The Nantahala and Pisgah NFs are two of the most visited NFs in the NF system. Plan revision efforts for the two NFs began in 2014 and took nearly 10 years of collaborative engagement and development to finally be implemented in February of 2023. The plan revision constituted a significant amount of time and resources committed not only by our agency but also of the more than 40 other state agencies, non-governmental organizations, and partner groups that collectively worked to develop the plan. Incorporation of this amendment into the LMP so soon undermines the carefully developed plan components and framework for which a considerable amount of compromise was made by a broad array of stakeholders.

g. Concern that the amendment could have disastrous effects on the timber economy of

western NC.

There is a great and immediate need for ecological restoration and forest management across the forests of NC. The NCWRC is greatly concerned over the potential economic impacts an amendment could have on the already strained timber industry in our state. In western NC, available timber markets have been devastated by the closure of the Evergreen Packaging Paper Mill in Canton, NC. Many of the few remaining loggers, mills, and wood processors in the region are dependent upon wood products supplied from public lands to remain in business. The potential loss of wood product flows from NF lands in NC during amendment implementation is very concerning for achieving ecological restoration objectives and to sustain the already strained timber economy.

## 2. DEIS

a. Concern that the DEIS does not provide adequate rationale for requiring all LMPs to be amended during a single timeframe.

The DEIS states [ldquo]developing OG forests across the NF System is prudent, warranted, and is best advanced at this time via amendment of land management plans.[rdquo] However, the DEIS provides no clear information on the purpose and need for addressing all land management plans across the country at the same time, nor why doing so through a nation-wide amendment change is the best course of action.

The DEIS states that one of the primary purposes of the amendment is to require Forest Service Units to consider [ldquo]whether current standards and guidelines (within LMPs) provide enough restrictions to protect current and future OG forests from future timber harvest.[rdquo] We find this to be a weak argument for justification, as the Environmental Impacts Analysis (EIA) contradicts this stating, [ldquo]timber harvest was determined to have a relatively inconsequential effect on future OG forests.[rdquo] The EIA also found that [ldquo]the amount and distribution of mature forests across the NF System suggest that many of these lands have the inherent capability to sustain OG forests

into the future.”]

Advancing a national OG directive through a required immediate amendment change seems entirely unnecessary and counterproductive. Considering the developmental requirements needed for forests to reach OG characteristics (in some types such as redwood forests this could take hundreds of years) against the timeframe for which LMPs are to be revised and implemented (15-20 years), the necessity of the amendment to be implemented immediately and simultaneously across all 128 LMPs seems unwarranted. In addition, the ability of active management to progress a stand towards OG characteristics is limited and unlikely to occur within the timeframe of a single LMP.

Recommendation: It is our opinion that a more appropriate approach to address the purpose and need for the NOGA is through its inclusion as a requisite part of the Planning Rule. National Forest and Bureau of Land Management (BLM) lands would then be required to incorporate such changes as LMPs are subsequently revised. We recommend that priority and emphasis be given to revising LMPs for lands which have not been updated since the implementation of the 2012 Planning Rule and/or do not currently have some type of established framework for promoting OG forest characteristics and enhancing ecological integrity.

b. The DEIS does not provide a sufficient assessment of what potential impacts the amendment will have on the flow of projects over the next few years at a forest-wide level.

Because the amendment is developed at the national level, the corresponding EIA assesses impacts in a similar fashion. While impacts to individual NFs were considered within the DEIS as it relates to the prescriptive effects at the LMP level, it does not take into consideration impacts to planned projects that have yet to have line officer approval. While we realize that analysis of this at a national scale would be intensive and time-consuming, the lack of such information in the assessment limits the ability of the public to adequately assess potential impacts to specific NFs and on-the-ground implementation.

Additionally, the lack of this information in the DEIS could have significant impacts on local communities that are characterized by high proportions of federal lands within their jurisdictions. Such is the case for several counties in western NC. Of specific concern here in NC are the potential implications on the [ldquo]G.A.P. Restoration Project[rdquo] currently scheduled to be signed and implemented early in 2025 across all three ranger districts of the Pisgah NF. This project would be the first implemented project under the collaboratively developed Pisgah Restoration Initiative as part of the USFS[rsquo]s Collaborative Forest Land Restoration Program.

Recommendation: Include a range of expected impacts to planned project implementation among NFs at a regional level in the final EIS.

c. The DEIS does not provide sufficient guidance to Forest Service Units regarding how NOGA components are to be implemented in consideration of other existing plan components and management strategies.

Plan components are generally developed in a manner in which multiple resource needs and requirements are considered in a holistic fashion. Due to the interconnectedness of all planning components at a forest-wide scale, incorporation of new components outside of a full plan revision potentially brings impacts or effects to those other plan components. While this would be an expected outcome of a plan amendment, doing so could have major implications to plan components which provide guidance for managing other structural and age class characteristics across a forest. While the NOGA provides flexibility for Forest Service Units to develop an individual Adaptive Strategy for Old-growth Forest Conservation (ASOFC), it provides little guidance on how to incorporate or prioritize those strategies in regard to other forest priorities such as the restoration of priority habitats, management of non-native invasive species, conversion from industrial forest conditions, or addressing uncharacteristic vegetation issues.

Recommendation: Incorporate more guidance and flexible strategies in the decision memo for how Forest Service Units are to incorporate changes in LMPs when NOGA changes contradict or

are in competition with other LMP plan priorities.

d. Concern that the DEIS is somewhat misleading and generally alludes to OG forests being perpetual once such conditions are realized.

OG forests are not perpetual or everlasting, but ebb and flow in abundance and distribution across landscape on an ecological timescale. Amounts and distributions of OG fluctuate with a given system's historic or Natural Range of Variation. While this is stated numerous times throughout the DEIS, planning components associated with the amendment imply otherwise.

Recommendation: Include additional guidance related to planning components, in particular for Desired Future Conditions, which emphasizes that OG forests are not perpetual but cycle as part of natural ecological processes. Components should also acknowledge that forest management does not necessarily preclude a stand's ability to undergo natural successional processes and that many mature forests (particularly in the eastern US) are shaped by land use history or human disturbance.

e. Concern that the inherent capability requirement as part of the ASOFC is too vague for Forest Service Units to adequately implement.

The term inherent capability is not specifically defined within the DEIS. However, the USFS

Handbook defines the term as [ldquo]ecological capacity[rdquo] or [ldquo]ecological potential[rdquo] (36 CFR 219.19).

This definition provides little to no context for line officers to effectively determine the reasonable scale to use when implementing the amendment and the ASOFC. As the assessment identified that most of our nation's forests have the capacity or potential to reach OG conditions, the ASOFC framework for identification of stands suitable for OG management should also consider other factors besides an area's apparent capacity. Further expanding the term will also provide more context at the planning level, as the interpretation of what constitutes such capacity can vary greatly among planning units at a national scale.

Recommendation: Include additional guidance beyond just the [ldquo]inherent capability[rdquo] requirement within the ASOFC for consideration of an area[rsquo]s potential for OG forest management. Include other considerations in addition to the interrelationship of an area[rsquo]s physical elements, its climatic regime, and its natural disturbance regime. Other relevant and integrally important factors that should be considered include existing forest type, other restoration needs, the relative abundance and distribution of OG forest in comparison to other successional stages at a landscape scale, and historic and natural range of variation.

f. Concern that the DEIS definition of proactive stewardship only allows for management of forested stands for the benefit of OG characteristics.

While we support and appreciate the inclusion of a provision that allows for active management within OG forests, we are concerned that the definition of proactive stewardship does not provide enough flexibility to manage for ecological integrity above one specific structural condition. Under Standard 2A, the DEIS states that [ldquo]where conditions meet the definitions and associated criteria of OG forest, vegetation management may only be used for the purpose of proactive stewardship.[rdquo] The DEIS also states that [ldquo]there is no requirement that these areas (current OG forests) continue to meet the definition of OG when managed for the purpose of

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proactive stewardship; however, the project-level analysis will need to demonstrate that the proactive stewardship promotes one or more of the conditions and/or characteristics listed in Standard 2.a.i-xii[rdquo]. In short, this language suggests that once a stand or [ldquo]area[rdquo] meets the regional or management unit definition of OG forest, it would be required from that point forward to be managed for the sole purpose of [ldquo]proactive stewardship[rdquo] towards OG character, regardless of whether it continues to meet the definition of OG in the future. As described in the glossary of the DEIS, [ldquo]proactive stewardship[rdquo] is defined as [ldquo]vegetation management that promotes the

quality, composition, structure, pattern, or ecological processes necessary for old-growth forests to be resilient and adaptable to stressors and likely future environments.[rdquo] Therefore, the only management tools available for use in that stand from that point forward are those that either promote or move the stand closer to OG conditions.

Recommendation: Redefine proactive stewardship to include vegetation management that promotes the quality, composition, structure, pattern, or processes necessary for maximizing ecological integrity. This acknowledges the need for appropriate distributions of OG forest conditions and will further ensure that forests will be resilient and adaptable to stressors and likely future environments.

g. Concern that the DEIS implies that OG character equates to healthier forests or forests with increased carbon sequestration capacity.

It is important to reiterate that maximizing and/or accelerating OG forest conditions does not necessarily equate to maximization of long-term sustained carbon sequestration, nor does it ensure that forests remain healthy for any period into the future. Emerging science suggests that goals for carbon sequestration in healthy forests should focus more on optimizing sequestration over long periods of time through managing for multiple successional stages, as opposed to maximizing retention within a specific age class.

No forest is static, and future processes such as succession or natural disturbances like wildfires, diseases, pests, and wind events inevitably occur. It is also important to note that old age classes of forest do not equate to resilient forests of the future, only that such forests have been resilient to changes, threats, and stressors of the past. It is equally important to consider that increased age can also correlate to increased susceptibility to disease and competition, as well as to decreases in overall fecundity and productivity. Land Management Plans best achieve long-term health and resilience of forests by maximizing ecological integrity, maintaining a diversity of age classes at appropriate levels and distributions.

Recommendation: Reiterate in the final EIS that a diversity of age classes within the natural

range of variation is critically important and should be complementary to achieving OG desired future conditions.

h. Concern over the amount of ambiguity and vagueness within the plan components for the NOGA.

While we understand the need for the amendment to be broad enough to be applicable at a national level, our concern is that doing so makes parts of the amendment open to misinterpretation, conflict, and potential litigation. Plan components within the DEIS use vague timeframes such as [ldquo]current[rdquo], [ldquo]future[rdquo], and [ldquo]long-term[rdquo], which often lack context and contribute to reader confusion. Other examples include undefined terms such as [ldquo]successional pathways[rdquo] and [ldquo]culturally significant values[rdquo].

Goals of [ldquo]resiliency[rdquo] and [ldquo]adaptability[rdquo] are also noted in numerous sections throughout the proposed plan components. It is alluded that these goals would be achieved at some ambiguous point in the future. However, the DEIS provides no context for how these factors would be measured or what metrics would be used to determine goal achievement. We are concerned that this lack of clarity will force line officers to use discretion to determine their own methods and metrics, leading to misapplication of the amendment or potential inaction due to fear of misinterpretation. While the DEIS is clear that not all areas of mature forest are suitable for prioritization to OG and establishes the components needed for Forest Service Units to develop their own management approaches, there are still many aspects of plan components that need additional guidance and clarification.

Recommendation: Provide more concrete direction where guidance is overly vague and open to interpretation within the DEIS.

i. Concern that the DEIS does not provide sufficient guidance for how OG forests are to be prioritized and managed in relation to other seral classes or restoration priorities.



It is increasingly important that LMPs consider a broad array of compositions, structures, distributions, and disturbance regimes, as NFs are essential for maximizing our nation's forest diversity, providing critical roles for forest resiliency, mitigating the effects of climate change, and providing refugia for many wildlife species. While the DEIS is clear that "the role of other successional stages are important to ecological integrity," having specific, national plan guidance for one seral class without providing accompanying planning direction for other stages inherently prioritizes OG conditions over other important seral classes. For this reason, we believe that, if there is sufficient purpose and need to develop an amendment for OG forests, accompanying national guidance containing a statement of distinctive contributions, management approaches, desired conditions, objectives, standards, and guidelines would also be prudent for early, young, and mature forests. This will be key for providing consistent direction for line officers to incorporate and prioritize management across all seral stages.

Providing additional context and clarification for how each stage interacts at scale, distribution, juxtaposition across the landscape, as well as within the context to adjoining non-federally owned lands, will be critically important for ensuring long-term sustainability of underrepresented forest conditions such as OG and young forest.

The same is true as it relates to how Forest Service Units prioritize and address forest restoration needs. While addressing OG character can be a priority restoration need, particularly here in eastern US forests, doing so should be done in conjunction and in consideration of other restoration needs. OG management should not be the goal in and of itself. A primary example of this that occurs in NC and many eastern forests is the need to address uncharacteristic vegetation or the proliferation of mesophytic tree species prior to implementing OG management strategies. Another example is the promotion of OG character in forests where natural disturbance regimes have been suppressed or excluded, such as fire in fire-adapted forest types. Prioritization of OG management ahead of addressing other ecological needs may limit or preclude other forest restoration needs and further impact ecological integrity if not applied appropriately and

achieved in conjunction with other restoration needs.

Recommendation: Develop plan components that provide guidelines for other successional stages as well as OG, so that Forest Service Units can effectively address the interconnectedness of all seral conditions at the planning level. Include language in the DEIS that states targeted management to enhance OG conditions is only to be administered in concert with and or following an assessment of other restoration needs that may need to be addressed first.

#### COMMENTS ON SPECIFIC PLAN COMPONENTS

[bull] DRC- Suggest changing the word [ldquo]support[rdquo] to enhance or improve overall. The word [ldquo]support[rdquo] implies that ecological integrity can only be provided once OG character is reached, as opposed to ecological integrity being reached through appropriately distributions of various successional stages.

[bull] MA1a- Include context for how distribution, juxtaposition, interconnectedness, and ecological relationships between OG and other seral classes will be incorporated as part of the last bullet ([ldquo]Recognize the role of other successional stages that are important for ecological integrity[rdquo]).

[bull] MA1b- Include in language that [ldquo]identify[rdquo] will be guided by a regional or NF Adaptive Management Strategy for OG.

[bull] MA1b- It appears that proactive stewardship strictly promotes OG conditions above other seral classes.

[bull] MA1bv- This bullet is too broad. It will likely encompass every acre of mature forest in eastern forests.

[bull] DC01- This DC is written in a way that assumes OG conditions equate to healthier more resilient forests. While OG forests have shown to be resilient to past stressors and changes, these conditions in no way guarantee persistence or resilience for any period into the future.

This is one of the key characteristics that intrinsically defines a forest as old. The fact that it

is late or [ldquo]old[rdquo] in its character does not equate long-lasting.

[bull] DC02- What about cases where active or past land management practices are or have been the drivers behind whether or not an area has the inherent capability to progress towards OG character? The DC notes climate and fire refugia as being inherently capable of progressing toward OG character. However, there are many cases where these refugia are results of active management. For example, multiple rotations of prescribed burns create conditions where catastrophic wildfire are unlikely to occur and thinning yellow pine forests make them less susceptible to catastrophic pest (e.g., Southern Pine Beetle) infestations.

[bull] DC04- The amendment should provide more context to what [ldquo]in concert with other successional stages[rdquo] looks like. This is specifically important if the DC for OG forests is to provide ecological integrity for terrestrial and aquatic wildlife.

[bull] O1- While a short implementation timeline is greatly appreciated, we believe that a two-year timeframe is unrealistically ambitious. This timeframe is unlikely to be met on NFs where there are many interested parties and public stakeholder groups active in planning, such as the Nantahala and Pisgah NF and other Forest Service Units where multiple LMPs would need to be updated simultaneously.

[bull] S2aiii- The term [ldquo]at-risk species[rdquo] is too limiting, as it only includes Species of Conservation Concern and federally Endangered, Threatened, and Candidate species. Many NC Wildlife Action Plan Species of Greatest Conservation Need are excluded from this list, and it is essential that they are included so we have the flexibility to manage ecological conditions needed for these species as well.

[bull] S2aviii- As it relates to enhancing current OG forest conditions, it is a bit unclear how proactive stewardship for the purpose of further promoting [ldquo]successional pathways and stand development[rdquo] would look like as part of this standard. How might this be applied?

[bull] S2c- Should include a provision for specific wildlife purposes that would be needed to

promote at-risk species persistence.

[bull] G1- The word [ldquo]compatible[rdquo] makes this guideline somewhat unspecific. The intent of the guideline is described as needed to [ldquo]constrain vegetation management projects in areas that have been identified and prioritized for the recruitment and development of future OG forests.[rdquo] However, including the word [ldquo]compatible[rdquo] here makes it sound like even if an area has not been identified or prioritized it could still be interpreted as compatible, and therefore need to be included. Areas not identified or prioritized in the ASO-GFC should not be recommended for additional consideration unnecessarily.

[bull] PM1- We suggest including this as part of the reported changes and or relationship changes of OG forest in relation to other successional stages.

[bull] ADAPTIVE STRATEGY FOR OLD GROWTH FOREST CONSERVATION- Appendix D

o Framework 1- Need to include more than just [ldquo]the role of other successional stages[rdquo] here. There is a need to expand and note the interconnectedness of other successional stages as it relates to how each stage affects the distribution and abundance of each other.

o Framework 2- The [ldquo]Evaluation and Forecast[rdquo] should also include the interconnectedness of other successional stages relative to OG conditions. This is noted and included in the [ldquo]Effective Monitoring[rdquo] section but not included or noted in the assessment section.

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,

Cameron Ingram, Executive Director

Ec: James Melonas, NFs of NC

Ryan Jacobs, Andrea Leslie, Kyle Briggs, and Brian McRae, NCWRC

ATTACHMENT: OG Comments 920.docx- this is the same content that is coded in text box, it was also included as an attachment