

# **ADDENDUM 2**

CA-2

## **Key Participants and Letters of Acknowledgment and Support**

### **Key Participants**

#### **WAP Coordinator**

Cindy Simpson, Habitat Conservation Division, NCWRC

#### **Partners**

Misty Buchanan, Director, NC Natural Heritage Program  
Lesley Starke, Program Manager, NC Plant Conservation Program

#### **WAP Steering Committee**

David Cobb, Research Program, NCWRC  
Shannon Deaton, Habitat Conservation Division, NCWRC  
Todd Ewing, Aquatic Diversity Program, NCWRC  
Lane Sauls, VHB Engineering and NCWRC Nongame Wildlife Advisory Committee  
Sara Schweitzer, Wildlife Diversity Program, NCWRC

## WAP Technical Team

NCWRC staff responsible for developing the technical contents of the Wildlife Action Plan, with a focus on priority species, priority habitats, threats, integrating climate change impacts, and recommended conservation actions. The Team convened work groups as needed.

Greg Batts  
Chris Dawes  
Kevin Dockendorf  
Luke Etchison  
Michael Fisk  
Joe Fuller  
Chris Goudreau  
Jeff Hall  
Brena Jones  
Chris Jordan

Philip Lucas  
Jeremy McCargo  
Allison Medford  
Jake Rash  
TR Russ  
Nick Shaver  
Vann Stancil  
Kendrick Weeks  
Brent Wilson



# ◊ North Carolina Wildlife Resources Commission ◊

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Cameron Ingram, Executive Director

August 24, 2022

Paul Wilkes, Chief  
USFWS Division of Federal Assistance  
1875 Century Boulevard, Room 240  
Atlanta, Georgia 30345  
[paul\\_wilkes@fws.gov](mailto:paul_wilkes@fws.gov)

Dear Mr. Wilkes:

As you are aware, the North Carolina Wildlife Resources Commission (Commission) began working on an interim major revision to create and add a list of plant Species of Greatest Conservation Need to the 2015 N.C. Wildlife Action Plan (Plan) as Addendum 2 in July 2021. We undertook this revision in partnership with two of our sister agencies, the N.C. Department of Agriculture and Consumer Services-Plant Protection Program (PCP) and the N.C. Department of Natural and Cultural Resources-Natural Heritage Program (NHP).

The Plan recognizes and identifies ecologically important landscapes and recommends conservation actions, such as partnerships, to further enhance North Carolina's habitat and species resiliency. Adding the list of NC SGCN plants actively supports the conservation of more North Carolina habitats and represents the high level of collaboration and partnerships the NCWRC routinely uses to implement conservation priorities which are core to the agency's mission.

Addendum 2 was presented to our board of commissioners in their July Committee of the Whole meeting, where commissioners unanimously expressing their strong endorsement of the revision. Please consider this letter as both the board and the agency's request for full approval of Addendum 2 to the 2015 North Carolina Wildlife Action Plan.

Sincerely,

Cameron N. Ingram  
Executive Director

cc: Kyle Briggs, Chief Deputy Director  
Shannon Deaton, Chief, Habitat Conservation Division  
Cindy Simpson, Wildlife Action Plan Coordinator

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☒ NORTH CAROLINA WILDLIFE RESOURCES COMMISSION ☒

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Cameron Ingram, Executive Director

**MEMORANDUM**

TO: Cam Ingram, Executive Director

FROM: Shannon Deaton, Chief, Habitat Conservation Division  
*Shannon Deaton*

DATE: August 22, 2022

SUBJECT: Addendum 2 Plant SGCN  
2015 NC Wildlife Action Plan Major Revision

A notification letter dated July 7, 2021 was sent to the U.S. Fish and Wildlife Service (Service) to inform them of our intent to prepare a major revision of the 2015 N.C. Wildlife Action Plan (Plan). Commission staff have worked in partnership with the N.C. Department of Agriculture and Consumer Services, Plant Protection Program (PCP), and the N.C. Department of Natural and Cultural Resources, Natural Heritage Program (NHP), to develop this revision. Staff and our partners have followed current Plan revision guidance and the Eight Required Elements provided by the Service in developing Addendum 2 Plant SGCN revision to the 2015 Plan.

The attached revision to the 2015 Plan is ready for submittal to the Service for review and approval. A summary of the significant changes is provided in this memorandum and a roadmap to the location where revision content will be incorporated into the 2015 Plan is provided in Chapter 1, Table A2-1 of the addendum.

If you have any questions or concerns, please contact me or Cindy Simpson, email or 984-439-9059.

cc: Cindy Simpson, NC Wildlife Action Plan Coordinator, NCWRC  
LeAnne Bonner, Federal Aid Coordinator, USFWS  
Kyle Briggs, Chief Deputy Director, NCWRC  
Kate Pipkin, Operations Manager, NCWRC

**Chapter 1: Introduction** – *adds new Section 1.4 Addendum 2*

- Section 1.4 provides information on the guidelines for submitting a minor or major revision to a state's Plan, a summary of the contents of this addendum, and the public review process used to capture public input about Addendum 2. A road map to the revisions made by this addendum and where the updated/revised information will be inserted within the 2015 Plan is included as Table A2-1 in Chapter 1.

**Chapter 3: Species** - *adds new Section 3.15 Plants*

- Section 3.15 introduces plants as a taxonomic group and describes the rare plant list published by the NHP biennially as a tool for documenting native species for which there is high conservation concern. Regulations and monitoring relevant to plant protection are described and the state regulation that establishes authority for plant protection is identified. The N.C. Plant Conservation Board Scientific Committee (Committee) leads efforts for creating a state list of protected species and their methodology is introduced as Appendix R. Conservation concerns and threats, knowledge gaps, management needs, and recommendations for priority conservation actions are provided in Section 3.15, following the same format used for other taxonomic groups described in the Plan.
- This information satisfies requirements of Elements 1 (species), 3 (threats/stressors), 4 (actions), 5 (monitoring), 7 (partner involvement), and 8 (public involvement). Element 6 (review and revision) is addressed in the 2015 Plan and is incorporated by reference. Additional support for these required elements is provided by the appendices.

**Chapter 4: Habitats** - *adds new Section 4.4.19 Piedmont and Coastal Plain Oak Forest natural community description*

- Section 4.4.19 adds a new natural community and describes eight different community types associated with the community based on composition and landscape position. Problems affecting the habitat, including an assessment of climate change impacts compared to other threats, and impacts to wildlife are discussed in this section. Recommendations for priority conservation actions are provided and follows the same format used for other communities described in the Plan.
- This information satisfies requirements of Elements 2 (habitat), 3 (threats/stressors), 4 (actions), 5 (monitoring), 7 (partner involvement), and 8 (public involvement). Element 6 (review and revision) is addressed in the 2015 Plan and is incorporated by reference. Additional support for these required elements is provided by the appendices.

**Appendix CA-2** – *adds list of key participants and letters of acknowledgement and support*

- Lists the names and organizations of key participants involved in developing Addendum 2 and includes copies of notification and support letters for this major revision.

**Appendix PA-2** – *adds a list of all plant SGCN*

- This appendix is a table providing scientific name, common name, federal and state protection status, and NatureServe global and state ranks for all plant SGCN. This information is included as both printed material and an electronic Excel file.

**Appendix R** – *adds new North Carolina Protected Plant Species and Plant SGCN Evaluation Methodology*

- A white paper to document the methodology used by the PCP Scientific Committee to evaluate native plant species to identify those for which there is conservation concern and a need to assign a protection status under North Carolina law. The PCP and NHP have determined the methodology is appropriate for identifying plant SGCN for inclusion in this revision to the 2015 Plan.

**Appendix S** – *adds new Public Review Comments*

- Provides a copy of the 30-day public review announcement and the survey questions used to request and collect public comments. A list of all public comments submitted during the review period are included in this appendix.

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Roy Cooper  
Governor

D. Reid Wilson  
Secretary, Department of Natural and Cultural Resources

Will Summer  
Director, Division of Land and Water Stewardship  
Executive Director, NC Land and Water Fund

March 11, 2022

Ms. Cindy Simpson  
North Carolina Wildlife Resources Commission  
1721 Mail Service Center  
Raleigh, NC 27699-1721  
RE: NC Wildlife Action Plan Addendum 2 - Plant SGCN

Dear Ms. Simpson:

North Carolina's Natural Heritage Program supports all of the 2022 revisions to the NC Wildlife Action Plan included in Addendum 2, related to adding plants to the list of Species of Greatest Conservation Need (SGCN). Including plants and plant habitat in North Carolina's Wildlife Action Plan will help inform and support conservation strategies, decision-making, and sustainable action for rare and threatened plants and their habitats.

The plant species included in Addendum 2 are listed in the NC Protected Plant List, with a status of Endangered, Threatened, Special Concern-Vulnerable, or Special Concern-Historical. These designations were developed by the North Carolina Department of Agriculture & Consumer Services' Plant Conservation Program (NCPCP) staff, working closely with North Carolina's Natural Heritage Program, the NCPCP Scientific Committee, and published in the NC Administrative code (02 NCAC 48F .0300), amended effective May 1, 2021. These represent the most imperiled plant species in North Carolina, with verifiable data demonstrating threats and trends.

Including plants as SGCN will increase awareness of plant conservation; provide more consistent information for planning, conservation, and land management across state agencies; and help inform conservation and inventory priorities. We believe it will also encourage research, restoration, outreach, and leadership efforts for plant conservation. We appreciate and support this opportunity to collaborate with the NC Wildlife Resources Commission, NC Plant Conservation Program, and US Fish and Wildlife Service for conservation of wildlife, plants, and habitat in North Carolina.

Sincerely,

Misty Buchanan, Deputy Director for Natural Heritage  
Division of Land and Water Stewardship

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**Steven W. Troxler**  
Commissioner

**North Carolina Department of Agriculture  
and Consumer Services**  
*Plant Industry Division*

**Dr. Bill Foote**  
Director

**Joy A. Goforth**  
Plant Pest Administrator

**Brian D. Bowers**  
Seed and Fertilizer  
Administrator

March 11, 2022

Ms. Cindy Simpson  
North Carolina Wildlife Resources Commission  
1721 Mail Service Center  
Raleigh, NC 27699-1721  
RE: NC Wildlife Action Plan Addendum 2—Plant SGCN

Dear Ms. Simpson,

The NC Plant Conservation Program is in full support of the 2022 major revision to the NC Wildlife Action Plan (Addendum 2) to include plants as Species of Greatest Conservation Need. This document is a critical conservation strategy for our state and the inclusion of plant species and plant habitats will be of benefit to the conservation and planning efforts across North Carolina.

The species list put forward in this major revision are listed under the NC Protected Plant List and have been vetted by the NC Plant Conservation Program and NC Natural Heritage Program and carefully reviewed by the NC Plant Conservation Program's Scientific Committee and NC Plant Conservation Board. This list was last updated in May 2021 and represents our best understanding of the plant species in the state which are in the greatest need of conservation action.

Each plant species included in this list represents an important part of our state's natural heritage. The interactions these species have with wildlife and other plants is critical to the overall health and resilience of the natural communities they reside in. Including plants in the overall conservation strategy for North Carolina will not only broaden the scope of conservation decision-making, we believe it will lead to improved conservation outcomes and strengthen partnerships among conservation organizations. Thank you for the opportunity to work on this project with you.

Sincerely,

Lesley Starke  
NC Plant Conservation Program Administrator

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## ◊ North Carolina Wildlife Resources Commission ◊

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Cameron Ingram, Executive Director

July 7, 2021

Paul Wilkes, Chief  
Division of Federal Assistance  
U.S. Fish and Wildlife Service  
1875 Century Boulevard, Room 240  
Atlanta, Georgia 30345  
[paul\\_wilkes@fws.gov](mailto:paul_wilkes@fws.gov)

Dear Mr. Wilkes:

The North Carolina Wildlife Resources Commission (Commission) is working in partnership with the N.C. Department of Agriculture and Consumer Services, Plant Protection Program (PCP), and the N.C. Department of Natural and Cultural Resources, Natural Heritage Program (NHP), to develop a plant list of Species of Greatest Conservation Need (SGCN). This letter is to notify you of the intent of the Commission to undertake an interim major revision to add the plant SGCN list to the 2015 N.C. Wildlife Action Plan (Plan) as Addendum 2.

This interim major revision will follow the guidance in the December 2017 U.S. Fish and Wildlife Service's (Service) memorandum for all States on Plan review and revision. The guidance defines a major revision as a significant change to the methods, criteria, or processes used to address any of the Eight Required Elements described in the approved Plan. We understand this Addendum 2 will require a formal review by a Regional Review Team (RRT) convened by the Service and a recommendation from the RRT for approval. You will recall that we submitted an Addendum 1 to your office and received approval in September 2020 and included minor revisions to 4 chapters.

Commission staff began working with the PCP and NHP on this major revision as of June 1, 2021 and anticipate submitting Addendum 2 of the 2015 Plan to the Service by January 2022. North Carolina's Addendum 2 will include the following additions and revisions:

- **Chapter 3: Species** - add a new Section 3.13 Plant SGCN  
Section 3.13 will include the methodology used to evaluate and identify protected plants, which are now considered plant SGCN in North Carolina. Priority conservation actions will also be provided in Section 3.13, following the same format for other taxonomic groups described in Chapter 3. The PCP manages the evaluation process and publishes

the list of protected plant species biannually. The N.C. Plant Conservation Board Scientific Committee and N.C. botanists have followed an established evaluation method to assess rarity, trends, and threats to native plant species found statewide and created a list of plant species for which there is the highest conservation concern. The protected plants evaluation includes public outreach and offers stakeholders an opportunity to contribute and comment on the results. The final list is approved by the N.C. State Legislature and is published in the N.C. Administrative Code (02 NCAC 48F.0300). The most recent list of plant SGCN was amended effective May 1, 2021.

- **Chapter 4: Habitats** - add plant SGCN associations as appropriate to each natural community  
This chapter provides information about important habitats for fish and wildlife. All plants listed as SGCN will be associated with one of the natural communities described in Chapter 4. Section 4.1.3 Species and Habitat Associations will also be revised to provide information about other natural communities and to introduce appropriate references for descriptions of natural plant communities found in the State. A table providing habitat associations for all plant SGCN will be added to a new Appendix HA2-1.
- Add a new **Appendix HA2-1** - All Plant SGCN Habitat Associations that provide natural community associations
- Add a new **Appendix PA-2** - a list of all Plant SGCN
- Add a new **Appendix R** - the North Carolina Protected Plant Species and Species of Greatest Conservation Need Evaluation Methodology white paper.

If you have any questions, please contact Cindy Simpson [cindy.simpson@ncwildlife.org](mailto:cindy.simpson@ncwildlife.org) or Shannon Deaton [shannon.deaton@ncwildlife.org](mailto:shannon.deaton@ncwildlife.org).

Sincerely,



Cameron Ingram  
Executive Director

cc: LeAnne Bonner, Federal Aid Coordinator, USFWS  
Kyle Briggs, Chief Deputy Director, NCWRC  
Shannon Deaton, Chief, Habitat Conservation Division, NCWRC  
Kate Pipkin, Operations Manager, NCWRC



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1875 Century Blvd  
Atlanta, Georgia 30345



In Reply Refer To:  
FWS/WSFR/NC Plan

Mr. Cameron Ingram  
Executive Director  
North Carolina Wildlife Resources Commission  
1701 Mail Service Center  
Raleigh, North Carolina 27699-1701

Dear Mr. Ingram:

This letter is in response to your letter dated July 7, 2021 seeking U.S. Fish and Wildlife Service concurrence for the North Carolina Wildlife Resources Commission to begin a process of review to revise the North Carolina Wildlife Action Plan (Plan) by January 2022.

The Service appreciates your continued willingness to critically evaluate the current Plan, add plant species as Species of Greatest Conservation Need following a specified process, and revise associated sections in your Plan. You have proposed that this revision and related changes to the Plan should be considered a major revision. Based upon the current Plan revision guidance, the "Major Plan Revision" process involves seven steps:

- (1) The State Director notifies the Service Region by letter or email of intent to conduct a Major Revision.
- (2) The Service Region responds to the State via letter or email confirming or denying the Major Revision request. Appeals of the determination may be made in writing by a State Director to the Regional Director.
- (3) The State Director submits the modified Plan package to the Service Region. The package must include the following information as separate documents or as one combined document:
  - Summary of significant changes.
  - A "Road Map" that provides the locations of the Elements in the Plan, and describes how the current version of the Plan adequately addresses the Elements.
- (4) The Regional Review Team (RRT) reviews the Major Revision with input from WSFR and State staff and, following any dialogue between the parties, determines whether it meets the criteria to be approved or conditionally approved.
- (5) Upon recommendation of approval of a Major Revision by the RRT, the Regional Director or designee approves the Major Revision via letter or email to the State Director or designee.
- (6) The Service Region tracks and maintains an administrative record of Plan approvals.
- (7) Each State is encouraged to post an electronic version of its most recent Plan on its agency website with the summary of significant changes and the "Road Map."

We appreciate you notifying us early in this process and concur with your request. Please contact me at (404) 679-4154 or LeAnne Bonner at (404) 679-7357 if you have any questions.

Sincerely yours,

Digitally signed by PAUL WILKES  
Date: 2021.07.08 09:35:05 -04'00'

Paul A. Wilkes, Manager  
Wildlife and Sport Fish Restoration Program

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