



June 29, 2020

Mr. Allen Nicholas
Forest Supervisor, National Forests in North Carolina
160 Zillicoa Street, Suite A
Asheville, NC 28801

Dear Mr. Nicholas,

The North Carolina Forestry Association (NCFA) appreciates the opportunity to submit comments on the Draft Revised Nantahala and Pisgah National Forests (Forest) Plan (Draft Plan) and the Draft Environmental Impact Statement (DEIS).

NCFA is a private, nonprofit partnership with over 4,000 forest managers, landowners, mill operators, loggers, furniture manufacturers, educators, and others interested parties concerned about the long-term health and productivity of North Carolina's forest resources and the industries they support.

Over 100 years ago, North Carolina became the birthplace of science-based forest management thanks to George and Edith Vanderbilt's investment in the Biltmore Estate, stewardship of their "Pisgah Forest" through Gifford Pinchot, and subsequent founding of the Biltmore Forest School through Carl Schenck. North Carolinians continue to embrace sound forest science and technology and grow more timber volume per acre per year than ever before. In fact, our state's forestland is growing 50% more softwood and 100% more hardwood than is being harvested annually. Our state's overall timber inventory has increased 45% since 1974¹. North Carolina's forests are

¹ Brown, M.J. and J.T. Vogt. 2015. [North Carolina's Forests, 2013](#). Resource Bulletin SRS-205. Asheville, NC: US Department of Agriculture Forest Service, Southern Research Station. 91 p. Accessed April 22, 2020.

healthy, robust and support a wide variety of habitats, ecosystem services, and wood fiber, used in numerous ways. Sustainability is critical for our landowners and millions of our forested acres are certified by sustainability systems like the Sustainable Forestry Initiative (SFI), American Tree Farm System (ATFS) and Forest Stewardship Council (FSC).

Our state's forest products economic sector, which includes forest management, logging, recreation, wildlife, and forest products industries, ranks third among manufacturing sector employers in the state behind food products and fabricated metal product industries. According to a recent study by North Carolina State Extension, the total economic contribution of the forest products sector was \$33.6 billion, supporting approximately 150,400 full- and part-time jobs with a payroll of \$8.3 billion. Robust forest products markets are critical for the long-term sustainability of North Carolina's forests. Clean air, clean water, abundant wildlife habitat, diverse recreational opportunities and good paying jobs are all possible thanks to healthy forests and the markets they support. Several of our members have their operations in communities within and adjacent to the Nantahala-Pisgah National Forest (herein after "The Forest") and management of these lands affects the viability of their businesses and the economic well-being of the communities themselves.

The purpose of the action is to revise the 1987 Land and Resource Management Plan for the Forest, which encompasses 1,043,000+/- acres. The Forest lies within the Blue Ridge province of the Appalachian Mountains in Western North Carolina across eighteen counties- Avery, Buncombe, Burke, Caldwell, Cherokee, Clay, Graham, Haywood, Henderson, Jackson, Macon, Madison, McDowell, Mitchell, Swain, Transylvania, Watauga and Yancey counties. The plan area also encompasses six ranger districts: Cheoah, Tusquitee, Nantahala, Pisgah, Appalachian and Grandfather.

NCFA members have been engaging in the Draft Plan revision process since the Notice of Intent to revise the forest plan was published in the Federal Register on March 12, 2014². Our members have been actively engaged in the Nantahala-Pisgah Forest Partnership and the Stakeholders Forum for the Nantahala and Pisgah Plan Revision. The comments herein reflect the recommendation brought forth by NCFA and may not reflect the proposals and recommendations considered throughout the collaborative process. Despite this potential disparity, NCFA believes the Forest Service has satisfied the collaboration required by the 2012 planning rule. NCFA's comments will focus on several elements of the Draft Plan or DEIS that are most important to our membership

² [Notice of Intent](#)

and the surrounding communities and counties that are affected by the management decisions made by the Forest.

Background

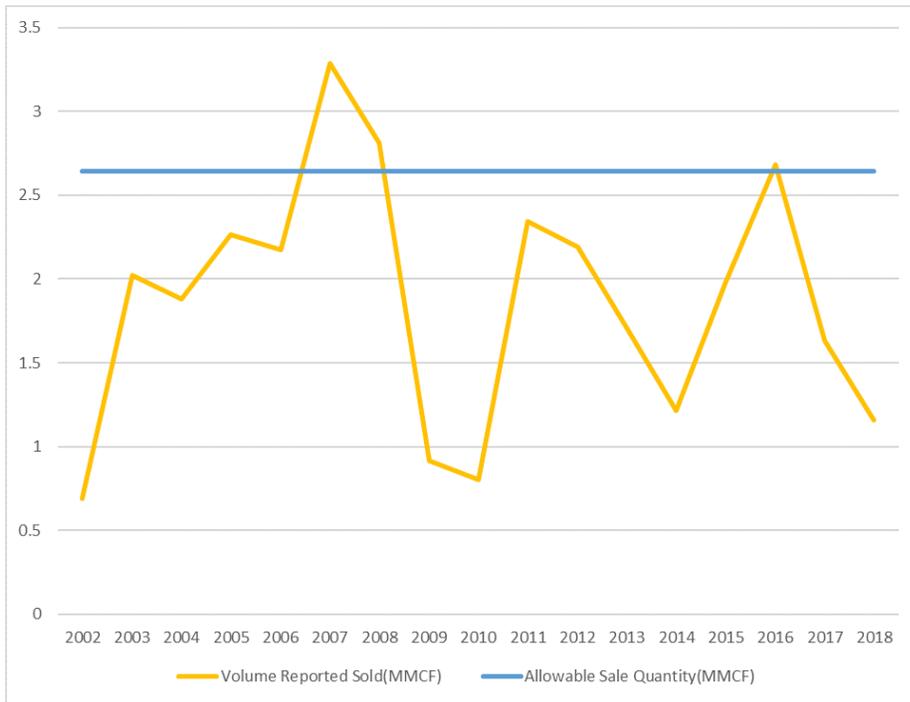
As mentioned earlier, the existing plan for the Forest was completed in 1987 and has been amended many times. Revised Forest Service policies, congressional direction, court decisions, new or updated conservation agreements and recovery plans, and new scientific findings have all highlighted that the current plans are outdated and need to be revised. The June 2014 Need for Change noted several key findings, which include:

- Update plan to conform to the 2012 Planning Rule and other recent laws and policies.
- Increase the amount of wildlife habitat throughout the Forest.
- Recognize and include plan components to guide and potentially enhance the role of the Forest's contribution to the social and economic well-being of local communities.
- Best Available Scientific Information should be used in making management decisions.

NCFA will focus most of our comments on the Forest Vegetation and Timber Issues identified in the Draft Plan and DEIS. However, these factors also affect other resource issues. The lack of quality habitat for species such as Ruffed Grouse, Turkey, Black Bear and other wildlife species as well, are all related to a departure from the Natural Range of Variation (NRV) due to lack of vegetative management .

The Long-Term Sustained Yield Limit (LTSYL) capacity calculated for the 1987 Forest Plan was 34.5 MMCF/yr. and was calculated for 275,000 acres. The allowable sale quantity (ASQ), as defined by the 1987 Forest Plan was 6.75 mmcf. The annual ASQ decreased to 6.75 mmcf after the 1994 Plan Amendment. The actual annual volume of timber products sold averaged 1.87 mmcf for the period 2002-2018. See chart below:

Figure 1. Timber product volume sold from the Nantahala and Pisgah National Forests 2002-2018.



While the ASQ for the current plan and the Projected Sale Quantity (PTSQ) is significantly lower than the LTSY for the current plan and the Sustained Yield Limit for the Draft Plan, the importance of the forest products industry remains strong in the multi-county plan area. Based on the map of primary forest product processors and the economic impact data for the forest products industry for the 18-county plan area suggest the industry is capable of handling an increase in timber supply from the Forest, as long as the timber supply remains elastic. The sustainability of the forest products industry will be a function of the availability of forest products generated from science based management of the Forest in the future.

The Draft Plan has identified landscape-level needs such as increased young forest conditions and attaining the desired Natural Range of Variation (NRV) in the various forest ecozones, as well as socio-economic needs that can be met by increasing forest restoration, wildlife habitat, recreation, timber harvest across the landscape. Moreover, the Draft Plan and DEIS emphasize the importance that timber harvest can play in ecological restoration goals. A substantial increase in timber volume from sound, silvicultural treatments, while respecting areas of high conservation value on the landscape, has broad support from diverse stakeholders such as the local collaboratives, forest products industry, and local governments.

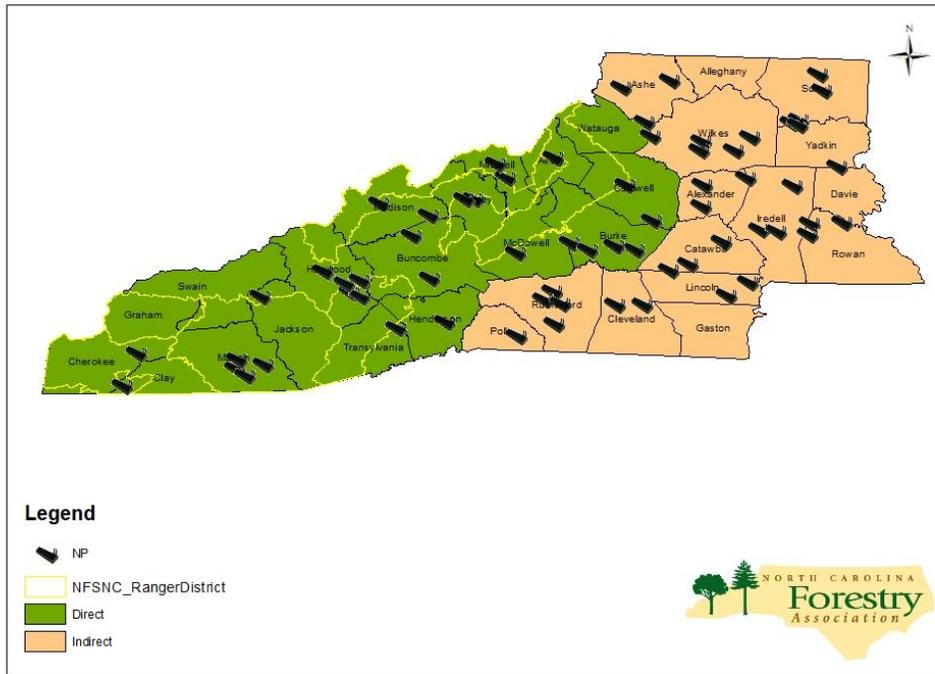
NCFA Issue #1 Socioeconomics

Timber Supply

The Forest should play a **vital** role in the forest products industry in Western North Carolina. The acquisition of these two forests was under the direction of the 1911 Weeks Act, which “provided authority to acquire lands for national forests to protect watersheds, to **provide timber**, and to regulate the flow of navigable streams.”³ Wood processing facilities depend on a predictable and economical supply of forest products in order to meet customer demands and remain profitable. Current owners cannot continue to make investments in their facilities without a predictable and economical supply of forest products. Likewise, future investors will not be interested in the purchase of such facilities without the assurance that a long-term, economical supply of raw materials is available in the immediate market area. The map below shows facilities that are affected both directly and indirectly by timber sales on the Forest. Many of the facilities located in the 18-county region surrounding the Forest do not procure timber products from the Forest due to the lack of a robust and functional timber sale program that generates US Forest Service timber sales, which in turn, puts additional strain on the wood basket in surrounding North Carolina counties.

³ Pg. 6. [Nantahala and Pisgah National Forest Plan Assessment 6.0 Economic Conditions and Trends](#)

Wood Processing Facilities Affected by the Forest in NC



The forest products industry in the multi-county area around the Forest contributes over \$3.4 billion to North Carolina's economy⁴.

⁴ [Economic Contribution of the Forest Sector in 2018.](#)

Table 1. Forest Economic Contributions for the Multi-county Area.

2018 Forestry Economic Contributions for the Nantahala & Pisgah 18-County Area				
	Employment	Labor Income (million \$)	Value Added (million \$)	Industry Output (million \$)
Forestry Operations	60	3.11	3.11	4.01
Logging	464	15.71	16.65	32.23
Primary Solid Wood Mills	686	34.18	51.79	181.53
Secondary Solid Wood Mills	5,421	255.53	344.65	1,009.36
Primary Paper Mills	1,096	107.30	221.15	815.84
Secondary Paper Mills	1,484	102.17	144.93	688.91
Total	9,211	518.00	782.28	2,731.88
Forestry Operations	69	3.23	3.85	5.36
Logging	692	21.68	25.61	48.24
Primary Solid Wood Mills	1,200	51.74	79.40	240.17
Secondary Solid Wood Mills	7,365	327.22	470.15	1,268.88
Primary Paper Mills	2,294	151.36	298.05	1,011.81
Secondary Paper Mills	2,624	144.66	218.94	842.59
Total	14,244	699.89	1,096.00	3,417.05

Regional Socioeconomics

The importance of the forest products industry extends beyond the multi-county area surrounding the Forest in western North Carolina described above in Table 1. The NCFA utilized Forisk Consulting to prepare a comprehensive Woodbasket analysis of all wood consuming production facilities in the market area whose procurement range contains the full extent and geography of the Forest. As demonstrated in Table 2 below, 34 wood consuming mills including Sawmills, Plywood, Pulp, OSB, and Pellet Mills have procurement capacities that are aligned with procuring forest products from timber sales administered by the Nantahala-Pisgah National Forest. All total, these wood consuming facilities in the region have a combined annual consumption capacity, ranging from 7.5 Million to 7.9 Million green short tons, over the time period from 2008 to 2020. Also, notable in this analysis is that this market capacity has only varied from a mean capacity of 7.7 Million tons, by 5% across the 12-year time frame analyzed. This represents a highly stable demand for the wood products produced in our region, which may be subject to cyclical market conditions, but overall is robust and healthy.

Table 2. Forest Product Facilities in the Nantahala & Pisgah Woodbasket.

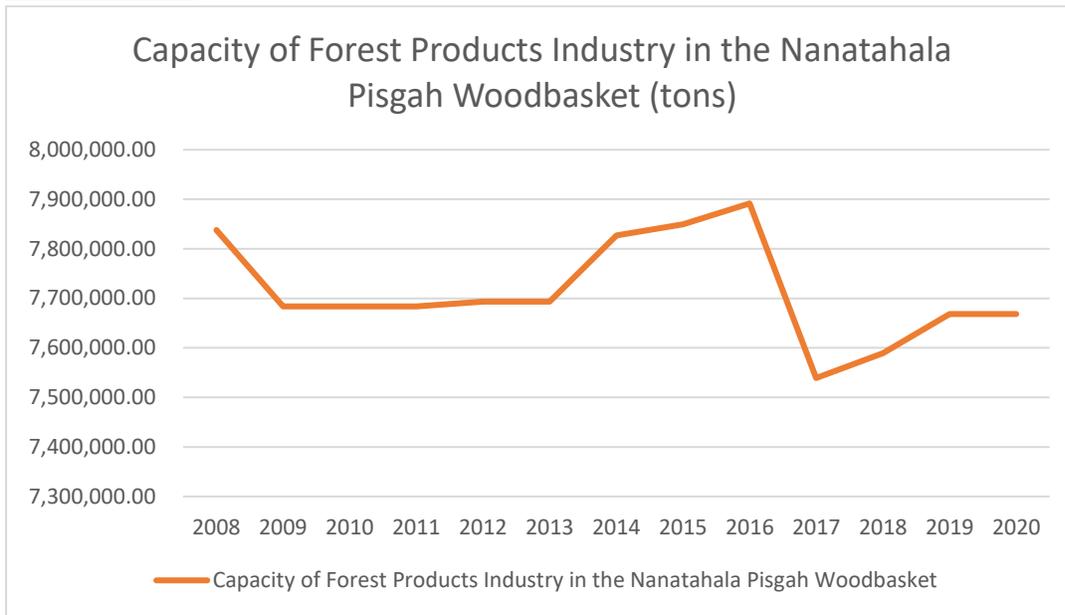
State	Forest Product Facilities by Type				
	Sawmills	Plywood	Pulp	OSB	Pellets
GA	12	0	0	1	0
NC	4	1	1	2	1
SC	5	0	2	0	0
TN	3	0	2	1	0
VA	0	0	0	1	2

While Table 2 provides an accurate count of the existing facilities, Figure 2⁵ reveals that, collectively, the forest products industry has lost capacity over the last several decades. A 2012 technical report for the Forest Service determined that **“consumption of wood products in the United States has risen in recent decades. U.S. lumber production is projected to increase through 2040.”**⁶ Competitive markets suggest the industry is capable of scaling up in the short term to meet increased national demand as long as timber supply remains elastic. This increasing demand trend for forest products is important in that it shows that there is more demand for local products if made available, because they are produced from sustainable practices, utilizing a renewable resource, resulting in recyclable products, many of which serve as a source of long-term carbon storage.

⁵ FORISK Consulting. 2020. Nantahala-Pisgah National Forest and Wood Product Facility Capacity Analysis.

⁶ Skog, Kenneth E.; McKeever, David B.; Ince, Peter J.; Howard, James L.; Spelter, Henry N.; Schuler, Albert T. 2012. Status and trends for the U.S forest products sector: A technical document supporting the Forest Service 2010 RPA assessment. General Technical Report FPL-GTR-207. Madison, WI: U.S. Department of Agriculture, Forest Service, Forest Products Laboratory. 35 p.

Figure 2. Capacity of Wood Processing Facilities in the Nantahala & Pisgah Woodbasket.



NCFA ISSUE #2: Vegetation

There is a demand for additional timber generated from the Nantahala and Pisgah National Forests as illustrated by the graphs and information above. NCFA encourages the Forest Service to treat as many appropriate acres as practical when preparing an Environmental Assessment or EIS. The same is true when drafting a Forest Plan Revision, especially as designation of timber suitability or for other compatible uses does not guarantee eventual treatment. Treating more acres for restoration purposes or wildlife habitat also increases the level of raw forest products that will be provided. The National Forests in western North Carolina are very important for providing the raw materials that wood processing facilities need to maintain their operations. The forest products provided by the Forest Service management are crucial to the health of our membership and their communities. Without the raw material sold by the Forest Service, these facilities would be unable to produce the amount of wood products that the citizens of this country demand.

NCFA ISSUE #3: Sustainable Timber Management

The NCFA believes that sustainable timber harvesting, when planned and supervised by professional foresters and other resource specialists, is a crucial tool for enhancing forest resiliency. Additionally, we believe that timber harvesting can be conducted in a

manner that supports and protects other valuable resources, including water quality and wildlife habitat.

Timber harvesting is the beginning of an economic value chain that is multiplied many times over in the local community with the production, transportation, and manufacturing of forest products. The economic engine begun by harvesting supports the livelihoods of rural communities across the state, communities that are often far removed from economic activity enjoyed by more urban areas.

Additionally, timber harvesting is an important tool that can aid in the recovery of endangered species, provide conditions that enhance the restoration of ecological communities such as the Mesic Coves, remove invasive species, and produce suitable habitat for important pollinators, game species, and songbirds.

The NCFA, like many other organizations that are committed to sound scientific management of our national forests, supports the appropriate use of both commercial and non-commercial timber harvesting on the national forests because we believe it plays a critical role in improving forest health and resiliency, improving rural economic livelihoods, and protecting and enhancing other important forest resources.

The NCFA is deeply concerned about the long-term sustainability of the timber supply on the Forest, and how the management paradigm is affecting this supply. In particular, NCFA and others in the local stakeholder collaborations have stated that significant ecosystem restoration cannot occur without congruent levels of economically viable timber harvest. The NCFA recognizes the need for significant thinning on the Forests to attain the desired conditions stated in both the Draft Plan and the DEIS, however, without incorporating regeneration harvest back into the management paradigm, much of the proposed restoration projects will not be economically viable for the forest products industry.

The restoration of mesic cove sites are great examples of the ability to utilize sustainable timber harvest to accomplish ecological restoration goals. The Draft Plan cites the Forest contains 249,000 ac of acidic cove and 199,000 of rich cove.⁷ The two ecological zones total 448,000 ac, yet in the model runs in Timber Appendix B Pages B-10 to B-12 there are no acres planned for regeneration in these ecological zones in Tier 1 under alternatives B, C and D. Based on stakeholder input, the NCFA feels it is likely economically and practically impossible to meet restoration and age class distribution goals without some level of regeneration harvests in the cove sites on the Forest. The Draft Plan “recognizes that the goal is to fall within the ranges for the ecozone

⁷ Pages 50 and 51 of the [Draft Plan](#)

structural classes.”⁸ With appropriate collaborative effort during planning and implementation, this statement should hold true to cove sites as well, thereby allowing for some level of regeneration in cove sites that is broadly supported by the community. This example holds true for other ecozones and forest types across the Forest. Therefore, the NCFCA recommends that the Plan Revision address the fact that the current levels of regeneration and thinning harvest activities projected in all plan alternatives are incongruent with achieving broadly supported Desired Conditions and forest restoration based Objectives within the life of the forest plan, and need to be revised upward wherever possible.

The difficulty that the Forest Service has had implementing any treatment that successfully regenerates a stand of heavy fuels, insect or disease infested stands, or mature timber has resulted in an unbalanced age-class distribution across the Forest, and has created a significant departure from NRV in stands in the 0-20 year age class. This departure concerns NCFCA and raises the question of where future timber products from Forest Service timber sales will come from. The NCFCA is supportive of the upper Tier 2 Objectives proposed for both thinnings and regeneration harvests to restore open woodland and create young forest conditions. The NCFCA recommends that the Forest Service recognize the importance of reaching Tier 2 Objectives, as they are broadly recognized as minimum levels of management necessary to meet Desired Conditions while providing a meaningful benefit to local economies and other habitat restoration goals.

The NCFCA recommends the USFS to clarify, ECO-S-17⁹, which limits timber harvest unit size. Harvests up to 80 acres should be allowed to accomplish stand-level goals to improve composition. For example, to remove a seed source or to make the restoration treatment economically viable. This exception should be limited to the list of priority treatments (condition-based objectives).

The NCFCA recommends the USFS to prioritize timber management objectives for the creation of young forest conditions in higher elevation ecozones (e.g. northern hardwood). Higher elevation forests that are structurally diverse provide critical habitat for grouse, woodcock, and other wildlife, especially amidst long-term projections for a changing climate. Currently, there are no timber harvest objectives for northern hardwood forests for two decades. Such lack of objectives would make future cost-effective management of these habitats difficult or impossible.

⁸ Page 46 of [Draft Plan](#)

⁹ ECO-S-16 located on page 66 in the [Draft Plan](#)

The NCFA recommends the USFS consider certifying the Forest with a third party such as the Forest Stewardship Council (FSC) or the Sustainable Forestry Initiative (SFI). Holding such certifications would likely increase the financial viability of timber sales on the Forest, and help connect forest product consumers in the general public, back to the sustainable forest management developed in the Plan. Moreover, the NCFA encourages the USFS to examine all Desired Conditions, Objectives, Guides and Standards to ensure that they do not preclude the Forest from obtaining FSC and SFI certification.

NCFA ISSUE #4: The Draft Plan is not consistent with the Multiple-Use Sustained-Yield Act of 1960 (MUSYA)

The Draft Plan defines a “desired condition” on page 5 as “a description of the goals and outcomes of forest management and the ecological, social and economic attributes that a forest can achieve over time.” The DEIS and ECO-DC-14 of the Draft Plan acknowledges that timber outputs contribute to the social and economic well-being of communities in western North Carolina. However, the Draft Plan does **NOT** explicitly define a “desired condition” for a predictable and sustained yield of timber resources from the Forest to adequately contribute to the social and economic well-being of surrounding communities. Instead, the Draft Plan and the DEIS describes timber will merely be used as a “**tool**¹⁰” for meeting other desired conditions. NCFA interprets this as an indication that the Forest Service does not view the management of any portion of the Forest, solely for the production of timber as a desired condition that allows for a predictable and sustained yield of timber resources during the life of the Plan. Moreover, neither the Draft Plan nor the DEIS include a sustained yield of timber as a “desired condition”. Therefore, the SPECTRUM model and its volume outputs are not based on sustained yield and the subsequent Projected Timber Sale Quantities (PTQs) are likely inconsistent with MUSYA.

MUSYA directs the Secretary of Agriculture to “develop and administer the renewable surface resources of the national forests for multiple use and sustained yield of the several products and services obtained therefrom.” 16 U.S.C. § 529.

MUSYA also declares that: “the national forests are established and shall be administered for outdoor recreation, range, **timber**, watershed, and wildlife and fish purposes.” 16 U.S.C. § 528 (emphasis added). “Multiple use” is defined, in part, as “the

¹⁰ ECO-S-01 located on page 61 in the [Draft Plan](#)

management of all of the various renewable surface resources of the national forest so that they are utilized in the combination that will best meet the needs of the American people” 16 U.S.C. § 531(a). Further, the Forest Service Organic Act directs that National Forests are to be established “to furnish a continuous supply of timber for the use and necessities of citizens of the United States.” 16 U.S.C. § 475.

MUSYA also defines “sustained yield of the several products and services” as “the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the national forests without impairment of the productivity of the land.” 16 U.S.C. § 531(b).

The tables in the Timber Calculations section of the DEIS (B-6), only identify a “sustained-yield limit.” The SPECTRUM models that were run for each alternative only calculated this “limit.” Moreover, the DEIS indirectly indicates that the SPECTRUM model was run not to calculate a sustained yield level, but rather to achieve desired conditions for other resources. This approach does not satisfy the intent and direction from the MUSYA, as this Act requires the Secretary to develop and administer timber resources for achievement and maintenance of regular outputs. Simply deriving an upper limit for sustained yield does not ensure that the Forest will “achieve and maintain” regular outputs.

The NCFCA recommends that the Forest Service add the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the national forests without impairment of the productivity of the lands a “desired condition” for the timber resource.

The NCFCA recommends that the Forest Service identify timber harvest as a desired condition and not merely as a “tool” to meet other desired conditions.

The NCFCA recommends that the Forest Service consider achievement and maintenance of regular outputs rather than limit its model calculations to upper limits.

The NCFCA is also concerned with ECO-S-05¹¹. We recommend the USFS amend the standard to read **Timber will be harvested using a harvesting system appropriate for the stand considering the full array of site-specific resource concerns, Objectives, Standards and Guides.**

NCFA ISSUE #5: Old Growth Network

Old Growth areas should be considered in the context of achieving Desired Conditions, as guided by NRV, across all ecozones. The NCFCA supports the most efficient and cost

¹¹ See [Draft Plan](#), Page 62

effective method for achieving Desired Conditions for Old Growth, while at the same time using adaptive management techniques, scientific approaches, and collaboration to ensure that site specific recommendations support broader landscape scale objectives regarding Old Growth Forests as contributing valuable ecosystem services. Many of our Forest Products Industry stakeholders adhere to rigorous Forest Certification Standards (FSC and SFI) that require special consideration for Old Growth Forests on the landscape. We request that the Draft Plan carefully use language in Standards and Guidelines that allows restoration in these special sites while also adhering to Forest Certification standards and protecting their inherent values on the landscape.

The NCFCA is concerned with the current inventory of old growth on the Forest. The DEIS states that 9% the Forest is in old growth but there has been no Forest Service inventory of OG so that figure needs considerably more qualification for the average public's understanding¹². A reoccurring theme in appeals on FS projects is the claim that portions of the sale are currently OG. The FS needs to provide clearer guidance around existing OG and the development of the Old Growth network to reach desired conditions related to NRV. This would include more clearly defining OG that qualifies for addition to the network and a mechanism for doing so that helps reduce project appeals.

In the DEIS, the analysis for Old Growth Trending landscape (OGT) seems to leave out consideration for significant areas. The following should be included in the final EIS:

100ft on both sides of all second order streams and above outside the designated OG and listed areas

30ft on both sides of all perennial first order streams and outside the designated OG and listed areas

15 ft. on all intermittent streams

The 1-mile Appalachian Trail corridor outside designated OG and listed areas should be OGT

Major river corridors such as the Nantahala, Cullasaja and Cheoah that are outside designated OG listed area should be OGT

At least 500 ft. for all NF bordering the Blue Ridge Parkway should be OGT and at least 300ft bordering lakes like Fontana, Chatuge, Santeela, Nantahala...etc. should be considered OGT; and

Shortleaf pine on many locations is in decline without active management or fire for reproduction. Coweeta has documented the loss of 90% of its yellow pine since the

¹² Old growth statistics discussed on Page 338 of the [DEIS](#)

1930s. The focus for shortleaf should be finding places to maintain or reestablish its ecosystem rather than designating it for OG with little or no restoration activities which would lead to further decline of the shortleaf pine ecosystem across the Forest.

NCFA ISSUE #6: State Natural Heritage Program

The North Carolina Natural Heritage Program serves forest landowners, forest industry, conservation organizations, and the public by providing valuable information on natural communities that occur throughout our state. This program is voluntary for landowners. It is not regulatory, only seeking to serve landowners and the public. The information collected and provided by the program gives forest landowners the information they need to protect and to enhance the natural areas on their properties and provides valuable information to forest managers and consulting foresters that help inform their management recommendations.

Additionally, forest certification programs require forest landowners to identify unique natural areas and to manage them in a way that takes in to account their special qualities. Identification and management of unique natural heritage areas is a condition of certification to the Sustainable Forestry Initiative Standard, the Forest Stewardship Council Standard, and the American Tree Farm Standard.

The Natural Heritage Program provides information, which fulfills these requirements. It also provides landowners with information who are developing Forest Stewardship Plans that will receive cost share funding. The North Carolina Forestry Association supports the work of the Natural Heritage Program and its important role in the identification and management of unique forest communities and its role of informing forest managers and the landowning public on the valuable natural areas across the state.

NCFA ISSUE # 7: Best Management Practices

The NCFA supports the legislatively defined forest practice guidelines and performance standards for water quality (now part of the Sedimentation Pollution Control Act). These practices represent sound, cost-effective ways of protecting water quality while allowing the continued management and harvest of forest products. The NCFA is concerned that standard SZ-S-01 located at page 42 of the Draft Plan is overly restrictive and such guidance should not be applied landscape-level. The NCFA recommends that all federal and state Best Management Practices (BMPs) be applied landscape-level.

NCFA ISSUE # 8: Herbicide Applications

The NCFA is concerned about AQS-G-02¹³, which “defines” a buffer for aerial and ground applications of pesticides and herbicides. The NCFA supports the safe and judicious use and application of pesticides in forest management. When applied under EPA-approved label instructions, pesticides used in forestry are environmentally safe. The NCFA recommends that USFS strike the standard in its current form and rewrite to read: **Herbicide and pesticide applications shall follow EPA-approved label instructions.** The EPA sets standards for herbicides and pesticides used in a forest environment. Defining standards that may exceed the standards set forth by the EPA could potentially limit ecological restoration work on some sites.

NCFA ISSUE # 9: Fire Management

The NCFA supports the continued use of fire as a management tool. Used properly, fire is an extremely cost-effective and environmentally sound practice. The NCFA supports the need for increased prescribed fire to restore open woodland conditions and fire adapted ecosystems on the Forest. We also recognize that mechanical treatments may need to supplement prescribe fire regimes in order to benefit at-risk wildlife species that depend on specific structural requirements.

The NCFA recognizes the consequences of a suboptimal prescribed fire program over the last several decades, which has been a stressor to the Forest and is a significant reason the Forest has departed from NRV. Prescribed fire can play a significant role in the regeneration of pine and oak ecozones and play an important role in the perpetuation of disturbance-dependent wildlife, pollinators, reptiles and herbaceous plants.

The NCFA recommends the USFS better align their burn objectives to meet the restoration needs of ecozones as indicated by the NRV model. The NCFA supports higher Tier 1 Objectives of Objectives of 10,000-25,000 acres per year and higher Tier 2 Objectives of 30,000 to 40,000 acres per year. The NCFA is of the opinion that the current limits for both Tier 1 and Tier 2 may constrain future Collaborative Forest Landscape Restoration projects and personnel capacity through partnerships.

NCFA ISSUE # 10: Management Area Allocation

State Natural Heritage Program

The North Carolina Natural Heritage Program serves forest landowners, forest industry, conservation organizations, and the general public by providing valuable

¹³ AQS-G-02 located on page 40 in the [Draft Plan](#).

information on natural communities that occur throughout our state. This program is voluntary for landowners. It is not regulatory, only seeking to serve landowners and the public.

The NCFCA suggests that the USFS engage in a collaborative process with stakeholders prior to the allocation of recognized SNHA's areas. We support placing state natural heritage areas that are validated and deserving of management area allocation outside of the timber base, to be managed within in the ecologically important areas (EIA) management area instead of other more restrictive management areas, because an EIA designation allows for restoration that could include timber harvest as a restoration tool.

Scenery

The forest products industry has engaged in countless timber sales on closed and open Forest Service roads where the trail system incorporates a portion of the long-term road system. When forest restoration occurs on those roads and in keeping with the history of that trail and road system, the public not only accepts it but it adds to scenic and wildlife viewing.

The Forest Service has an extensive road system and manages land accessed by a multitude of rural, state roads. The NCFCA understands that Forest Service lands are managed, in part, for aesthetics. Moreover, areas in the Forest adjacent to the Appalachian Trail and other high-traffic recreation sites and state highways may warrant the use of scenery analysis to ensure that their scenic integrity is maintained. However, we do not believe that such analysis is warranted in every project. The NCFCA recommends that the section of SC-G-03¹⁴ that reads “; and must be approved by a scenery management specialist” be amended to read, **“will be approved by the local District Ranger while recognizing the input from a scenery management specialist.”** The NCFCA believes that local District Rangers should be empowered to make the final determination whether scenic analysis is warranted.

Wilderness

The NCFCA recognizes the importance of the Wilderness Protection Act and the special role that remote and extensively managed forests play on the regional landscape. On behalf of our diverse membership it is important to clarify that some members support additional wilderness recommendations that are carefully and judiciously

¹⁴ SC-G-03 located on page 120 of the [Draft Plan](#). The last part of the guide reads”; and must be approved by a scenery management specialist”

recommended for remote areas with sound ecological integrity; some members are willing to live with additional wilderness recommendations as long as they do not negatively impact broader forest restoration or timber production goals; and some are not supportive of additional wilderness recommendations in any context.

Understanding there is a broad range of perspectives regarding additional wilderness, the NCFA is compelled to provide an informed narrative regarding areas that may be suitable for wilderness recommendation. The NCFA understands the congressional approval process for wilderness designation and we do not intend for this narrative to pre-determine any future NCFA support or opposition to any specific potential wilderness recommendation.

On the East side of the Appalachian Trail, the Southern Nantahala Wilderness should be best summarized and considered as three separate areas.

Steep terrain and ridges to the West, North and East isolate the Barkers Creek/Falls Branch drainages. Road access is feasible from the south but private land prevents public access unless condemnation is exercised. These drainages have large mature timber growing on the better soils and has not received any active management for 50-60 years. Since it adjoins the Southern Nantahala Wilderness, is highly remote with challenging access and has had decades of passive management, therefore, we have no objection for it to become a wilderness addition.

Yellow Patch/Scream Ridge area has two gated system roads that are maintained as linear wildlife openings. Moreover, several wildlife openings have been also maintained for decades. There are a number of regenerated stands that range from 15-35 years old. Grouse, deer and turkey hunters actively use the area. The gated roads provide a link and buffer to the heavily used open road FS67 to Standing Indian, Coweeta, and the rough and rugged Southern Nantahala Wilderness. There are no opportunities to actively manage for game species to the west, south and east due to its proximity to the Southern Nantahala Wilderness and Coweeta Hydrological Laboratory. Therefore, it is a very important area needed to maintain grouse populations in the southernmost tip of its range.

Big Indian area should be managed as back country and not wilderness. It is heavily used by Standing Indian campers, hikers, fishermen, hunters, fishermen and sites seers driving the open road FS67. The Big Ridge area has received a prescribed burn three to four times in the last 20 years by the Forest Service, which has improved conditions for

wildlife populations, and begun to restore the area to a more proper forest condition that would not be continued if the area becomes wilderness.

Cherry Cove Ext- The majority of this area is identified as an Inventoried Roadless Area and has been managed to maintain a road less character. The area has no NFS roads within its boundaries; however, to the west near Flea Mountain, there is a primitive road from private lands to the ridgetop, which does adversely affect the natural character of this narrow sliver of USFS land. Overall, the Cherry Cove area has had no timber or wildlife management activities in the recent past, and is natural appearing to the average forest visitor. The area has a significant infestation of Japanese Spiraea, which detracts from its natural condition. We have no objection for it to become a Wilderness addition.

Chunky Gal- The Chunky Gal Extension inventory area includes low maintenance level NFS roads, recent timber harvests, and maintained wildlife fields that detract from naturalness in their immediate vicinity. The northern boundary's shape and configuration confine recreation users to a relatively small area surrounded by a state highway. Opportunities for solitude are adversely affected in this northern area by sights and sounds of the adjacent highway and highly developed communities to the west.

The southwest portion of the area, adjacent to the Southern Nantahala Wilderness (Sharptop Ridge Inventoried Roadless Area), and the Chunky Gal Inventoried Roadless Area, have a higher degree of wilderness characteristics compared to the northern portion outside the IRA. While these areas are less than 5,000 acres, they are of sufficient size as to make practicable their preservation and use in an unimpaired condition because they are adjacent to an existing wilderness.

Tusquitee Bald- The Tusquitee Bald area is currently managed for dispersed recreation (including backcountry), scenery, wildlife, and timber. The area is a recreation destination popular with hikers, backpackers, horseback riders, hunters, and anglers. The area has two long distance hiking trails, Rim Trail and Chunky Gal Trail. Closed NFS roads in the area allow for hiking, hunting, horseback riding, and mountain biking. In addition to a recreation emphasis, parts of the area are actively managed for timber and wildlife. There are over 280 acres of timber harvests ranging from 0-20 years old and almost 770 acres, which are 21-40 years old. There are approximately 26 acres of maintained wildlife fields in the area and about 15 miles of low maintenance level NFS roads, many of which have culverts and one with a bridge.

This area should be managed as matrix and not wilderness although habitat creation through timber removal opportunities are limited, wildlife habitat could be created through prescribed burning.

Cantrell Top- The majority of this area has a natural appearance. The area has approximately 385 acres of past timber harvest ranging from 21-40 years old and there is evidence of associated skid roads; although these harvests have revegetated and are largely unnoticeable to the average visitor. Just over four miles of closed maintenance level 1 and 2 roads access maintained wildlife fields on the eastern edge of the area but impacts from these roads are confined to their immediate vicinity. The Benton MacKaye Trail is a minimally developed hiking trail along the ridgetop and does not detract from the area's naturalness.

This area should be managed as matrix and not wilderness. The opportunities for active management are important because of an emphasis on shortleaf pine restoration opportunities in the area of Wolf Ridge and Tate Gap.

Snowbird WSA- This area is an isolated area of approx. 11,000 acres. There is no opportunity for active management and there are no system roads. Until the illegal Off-Highway Vehicle problem is solved coming in from Squally Creek, it should not be moved forward as recommended wilderness.

The Wesser area has extensive steep and rugged terrain with difficult and limited access. Most of it is not suitable for active management. Even prescribed burning would be difficult due the octopus shaped land ownership pattern with adjoining landowners and development up every drainage. During the 2016 fall fires approximately 100-150 homes were evacuated. The area identified under the current plan for backcountry management should remain in the backcountry management area. As backcountry there is, a greater likely hood that the Table Mountain pine stands in the interior of Wesser will be sustained over time. It will also make management of the Appalachian Trail less complicated due to Wilderness constraints.

The Ellicott Rock extension would be an insignificant addition to an otherwise solid, compact and excellent wilderness to manage. The extension to the west towards private land would complicate forest management and prevent easy to accomplish prescribed burning on the proposed extension. Prior to National Forest ownership, private landowners had a timber harvest on two areas, which are now around 25 years old. National Forest lands around and east of Highlands have an extremely low percentage of the forest that can be managed for active management compared to the rest of the National Forest in Macon County. Factors for this are the terrain, existing abundance of

other hands-off management areas and the scattered National Forest ownership pattern. Due to the proposed extension's relatively gently and hidden terrain, elevation and history, it is vitally important for this area to receive active management for ecosystem restoration, wildlife improvement and access for hunters and be included into the matrix management area.

Overflow, better known by most locals as Blue Valley, should have a recommendation to Congress to release it as a Wilderness Study Area. It is recommended that it be placed into a backcountry Management area. Its conditions and small size does makes it an inappropriate wilderness addition under the Wilderness Act. It has FS Road 79, an open road, down the middle of it with decades long use for fishing, camping and hunting that is tied to the culture of many Macon county residents. The Area borders State Highway 106, a well-traveled truck route into Highlands and Cashiers. One can sometimes hear the Jake Break from the FS road 79. Blue Valley has intensive private development to its west and North East borders which greatly complicates wilderness management. Glenn Falls, a highly visited recreation site and trail, borders to the North East and is located only five- minutes from the Town of Highlands. A Back-Country MA designation would enhance prescribed burning limited white pine removal to improve the ecosystem health and prevent the total takeover of mature and immature white pine, which is occurring in some sections as well as allowing the Forest Service to maintain existing open and closed roads, wildlife openings and primitive campsites.

The NCFA appreciates the opportunity to comment on the Draft Plan and DEIS. In summary, the NCFA is in favor of the alternative or a modified alternative that provides for the greatest possible restoration of forest health across the landscape, while meeting the mandates of the MUSY.

The NCFA supports the acres and allocations included in Alternatives B and D, as they allow for the greatest levels of restoration and timber harvest amongst the alternatives. Regardless of allocations, we feel it necessary to clarify that the target annual harvest acres found across all alternatives, are incongruent and too low to meet the desired conditions stated for the life of the Plan. In particular, it is important to note that the thinning acres prescribed are so low that they will prevent even reaching Tier 1 Objectives for Open Woodland restoration. The NCFA requests that the thinning acres be revised upward to the greatest extent allowed, to support the desired conditions and objectives for Open Woodlands.

We hope the USFS will make all the important plan level decisions now to provide for successful implementation. If not, then limited restoration funds will continue to leave

projects open to appeal by those opposed to forest restoration and wildlife habitat improvement through timber harvest. Appeals usually result in a smaller project which deplete funds that could be spent on other restoration projects.

For example and consideration, data presented by the USFS shows that in alternatives B, C and D, 38-40% of the stands with a site index of 80+ in matrix are age 55 and younger. Our members, the hunting public and many others know that the remaining 60% in matrix is not all economically, physically or legally accessible. A common sense understanding of what is practical makes it imperative that the USFS adjust the objectives, standards and guides, and perform the necessary analysis in order to make implementation of the restoration and wildlife habitat goals in the Draft Plan a cost-effective reality.

The NCFCA looks forward to working with the throughout the implementation of the Final Plan. Please do not hesitate contacting me should any questions arise.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Hatcher, Jr.", written in a cursive style.

John E. Hatcher, Jr., Ph.D., CF
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