



**ROCKY MOUNTAIN
ELK FOUNDATION**

October 8, 2021

James Melonas, Forest Supervisor
National Forests in North Carolina Forest Supervisor's Office
160 Zillicoa Street, Suite A
Asheville, NC 28801

Re: Wildlife Openings Management Project Draft Environmental Assessment (EA)

Dear Mr. Melonas,

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the proposed action to maintain permanent wildlife openings in North Carolina National Forests. RMEF's mission is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. We represent more than 231,000 members nationwide and over 3,000 members in North Carolina. Since its inception in 1984, RMEF has permanently protected or enhanced more than 8.2 million acres of North America's most vital habitat for elk and other wildlife, including over 4,800 acres in North Carolina. As such, RMEF has a vested interest in ensuring the sustained productivity of elk and other wildlife in North Carolina.

RMEF supports the purpose and need as well as proposed treatments identified in the Draft EA. We congratulate the U.S. Forest Service (USFS) on taking an important step in ensuring diverse habitats across the North Carolina National Forests. RMEF offers the following comments for consideration.

- RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat, we encourage that the forest planning effort be coordinated with North Carolina Wildlife Resources Commission.
- Early seral forest provides important habitat for elk and other wildlife and is often achieved following disturbance such as fire and mechanical thinning. Decades of fire suppression have reduced early successional stages across the National Forest System. RMEF supports the use of mechanical thinning, prescribed burning and invasive plant treatments and other methods to encourage growth of grasses, forbs, and young shrubs that provide critical forage for elk and other species (Swanson et al. 2011).
- The proposed project would help move the National Forests of North Carolina toward desired conditions for wildlife habitat. Specifically, the draft EA states that for the Nantahala and Pisgah National Forests the proposal will '...provide at least 0.5 percent of MAs 1-5 in grass and forb openings at any one time including mowed landings and roads except where desired conditions for forest interior birds or old growth management are specified.' Since this amount represents the current permanent wildlife opening acreage (as of September 2021) for the forests, RMEF encourages the USFS to increase the proportion that will be maintained as grass and forb openings.

Again, thank you for the opportunity to comment on the Wildlife Openings Management Project in North Carolina Forests. We look forward to working with you on future implementation.

Sincerely,



Karie Decker
Director of Wildlife and Habitat