

November 5, 2022

Nick Larson  
National Forests of North Carolina  
Re: Grandfather, Appalachian, Pisgah Restoration Project (GAP)

The Nature Conservancy (TNC) of North Carolina appreciates this opportunity to provide comments on the Grandfather, Appalachian, Pisgah (GAP) Restoration Project. We enthusiastically support the use of prescribed fire techniques and mechanical forest restoration to increase the pace and scale of restoring fire to the landscape and promoting fire-adapted forests within the Southern Blue Ridge. The ambitious scale of this project and collaborative approach to management on National Forest Lands should become the model for accomplishing the goals set forth in the new Forest Plan.

Additionally, TNC fully supports the focus on restoration proposals in fire-adapted communities as proposed in this scoping letter. The goal to 'restore and maintain healthy, functioning fire-adapted forest ecosystems' that need attention due to nearly a century of aggressive wildfire suppression align with the need to manage the forest to be more resilient to a changing climate. Overlaying these prescribed burn units with silvicultural treatments will facilitate a faster transition to structurally diverse forests comprised of multi-aged fire-adapted species. It is our hope that the Pisgah National Forest will continue to prioritize silvicultural treatments that promote fire-adapted southern yellow pine and oaks in current or future prescribed burn units.

### **Forest-wide Approach**

We applaud the ambition of this project that seeks to restore fire to tens-of thousands of acres and improve thousands of acres of forest across all three ranger districts. The *Purpose and Need* laid out in the scoping make the need for action clear and the Forest Plan lays out the sideboards for action. We recognize that new approaches to accomplish projects through NEPA are necessary to attain the level of management proposed at the landscape scale in both the Nantahala-Pisgah Forest Partnership (NFPF) comments and what is laid out in the new Forest Plan. We hope that efficiencies can be gained in the landscape-scale approach and that the Forest Service will pursue a strategy for implementation that is the most productive in treating the most acres over the shortest period while also engaging in adaptive management.

### **Management Areas**

As a collaborator, this project has been very difficult to comment on due to the uncertainty of management area allocation that will be unveiled with the Final Forest Plan. It is difficult to be supportive of the full suite of management actions in each place without knowing what the management limitations will be as prescribed by the Forest Plan. We are supportive of the large-scale approach, but we need more details about potential actions occurring within a specific geography to give meaningful comments. We urge the Forest Service to include partners, like TNC, and to continue to be transparent in the site-specific development of this project.

### **Fire and Forest Management**

We are encouraged that the Forest Service has used multiple remote sensing products to identify the areas that are the highest priority for re-introduction of fire. These are the areas with high ecological need that may support rare plant communities but can also be those places that interface with private property surrounding the Forest. Efforts should be made to include adjacent

landowners in the process and management to create softer edges of restoration around the National Forest. In addition, forest management through non-commercial and commercial approaches should seek to maintain or improve the competitive ability of fire-adapted species and occur within areas that can also be burned. This project strives for Tier 1 of the restoration goals in the Forest Plan, we hope that with partner engagement we can aim for Tier 2, either in the scope of this project or supplemental decisions within the next decade.

We hope that the Forest Service will have a balanced approach to treating different ecozones with site appropriate restoration-focused silviculture techniques. There should be as much emphasis on middle to high elevation fire-adapted forests as on lower elevation forest types. Silviculture should aim to improve species composition while diversifying structure at the landscape scale.

### **Climate Change**

It is imperative that climate change be included in the *Purpose and Need* of this project. It is and will continue to be an important consideration when deciding how and why to manage the forests. Climate change is expected to affect many aspects of forest management in the southern Appalachian Mountains. It will likely affect both the viability of various species within the region but also will affect wildland fire management. Warmer conditions with steady precipitation totals will favor species that are adapted to drier conditions such as oak species and southern yellow pine species. Increasing late-summer droughts extending into autumn leaf fall increase the wildfire potential that can negatively affect opportunities for implementing prescribed fire by either reducing viable burn windows or resulting in higher intensity fires that do not meet resource objectives.

### **Building in Adaptation (Monitoring)**

As a result of the size and scope of this decision we strongly encourage an adaptive management approach to implementation of this project. The Forest Service should establish a monitoring protocol for the treatments associated with this project that informs the implementation of other treatments over the duration of this project. If a restoration approach is not working the Forest Service should strive to alter the project design to reach the desired outcomes.

### **Continued Partner Engagement**

The Forest Service has done a good job engaging with the Nantahala Pisgah Forest Partnership, including TNC, throughout the development of this project to date. We hope that as the Forest Service moves from scoping the *Purpose and Need* to developing site-specific management proposals that the agency continues to engage and utilize partners to develop a project that is broadly supported by the public and limits potential conflict. There are many areas identified within the *GAP Newsletter* that may not have broad partner support for the full suite of management actions. In these areas, it will be imperative for close partner engagement to develop management actions that will be broadly supported by the public.

### **Additional Areas identified for Management**

Baldwin Branch on the Pisgah Ranger District. This area received a commercial timber harvest in the past 10 years and included a prescribed burn unit. This prescribed burn unit should be expanded to encompass the vegetation management that has supported the recruitment of shortleaf pine and included as part of this project.

The USFS manages land in the Bohaynee area in Transylvania County that is adjacent to TNC's Silver Run Preserve. At this preserve we are conducting active management that includes forest stand improvement and controlled burning. We look forward to opportunities to work across boundaries, where it is appropriate, to achieve larger-scale restoration and as such would recommend this project encompass this area.

### **Summary**

We recognize the effort that the Pisgah National Forest staff has put into increasing the pace and scale of restoration of fire-adapted forests. The GAP project can be a model to other agencies for innovation and inclusion of partners for implementing restoration at a landscape scale.

As members of the Nantahala-Pisgah Forest Partnership (NPFP), we strongly encourage that any proposed project be in alignment with the recommendations made by the NPFP and the forthcoming revised Forest Plan. We also support any comment the Eastern Band of Cherokee Indians that supersedes any of the above comments.

On behalf of The Nature Conservancy, we appreciate your consideration of these comments as our ongoing partnership with the US Forest Service is very important to us. If you have any further questions for us, please do not hesitate to reach out.

Sincerely,

Greg Cooper  
Southern Blue Ridge Conservation Forester