



Dear Nick Larson,

The Nantahala-Pisgah Forest Partnership appreciates the opportunity to offer comments to the Grandfather Appalachian Pisgah (GAP) Restoration Project.

The partnership is fully supportive of the Purpose and Need for the project. We recognize the need to reduce the risks and impacts of high severity wildfires on residential communities and associated values surrounding the National Forest. While also improving the resiliency of our forest ecosystems, and restoring and maintaining healthy, functioning fire-adapted forest ecosystems and the services they provide. This project will meet compositional needs that will lead to a climate-adapted forest while also increasing structural diversity across the landscape. We are encouraged by the novel approach to increase the pace and scale of fire-adapted forest restoration to accomplish the ambitious goals set forth as part of the Pisgah Restoration Initiative and tiered approach laid out within the Forest Plan.

We want to be engaged in project design before this is handed to the NEPA Enterprise team for analysis. We would like to know the timeline for design and how we can contribute within it.

Concerns:

The Partnership would like to be further engaged around these topics.

- The GAP project's current restoration goals fall short on meeting Tier 1 objectives. While we understand that the GAP project only includes the Pisgah National Forest, and is one decision, it is likely going to be a significant portion of the implementation of the new Forest Plan on the Pisgah National Forest for the next 5-10 years. We would like the Forest Service to increase their goals and utilize partner support to achieve Tier 1 goals in this project and strive for Tier 2 in this project and with supplemental decisions.
- The project proposal should specify the exact commercial and non-commercial activities being proposed for each site. The proposed action fails to mention commercial timber harvest as a method of removing uncharacteristic trees, improving species composition, establishing and recruiting oak regeneration, and restoring open structure to fire-adapted ecozones. Group selection/femelschlag, shelterwood treatments, commercial thinnings, and clearcuts are all potential silvicultural treatments that should be considered on a site-specific basis for the success of the project. Because timber harvest is an area that has some potential for controversy, we want to provide input about when various types of silvicultural treatments could be the right tools. Specific active forest management practices, as they apply to the Partnership recommended geographic allocations detailed below, should be included in the project's proposed project activities:

- **Removing uncharacteristic tree species** to restore tree species that are more characteristic of that ecological zone. For example, clearcutting an eastern white pine stand and planting northern red oak or managing for natural hardwood regeneration.
 - **Midstory removal treatments** implemented as the first phase of a shelterwood sequence to establish advanced oak regeneration in a subcanopy. This is especially useful in mesic oak stands where undesirable trees are more competitive (e.g., red maple and poplar) and frequent fire is less appropriate.
 - **Establishment cutting as part of a shelterwood-burn technique** to establish and recruit oak. This includes commercial timber harvesting as a partial overstory removal and subsequent prescribed fire implementation. This could be implemented irregularly as an expanding gap shelterwood approach (femelschlag). This is especially useful in drier oak stands where oak is more competitive and frequent fire is more appropriate.
 - **Overstory removal treatment through a commercial timber harvest (one-cut shelterwood)** where there's currently advanced oak regeneration established and the overall stand would benefit (composition, structure, function). This could be in locations with previous thinning, has a history of fire activity, or on drier sites where oak is inherently more competitive and subcanopies are more open (dry ridges). There could also be places that previously received an establishment cut of a shelterwood or a heavy thinning that have advanced oak regeneration that now require a release treatment.
 - **Crop tree release** in stands that have reached the stem exclusion phase of stand development as a means to decrease tree stocking density and favor fire adapted tree species (i.e., oak or yellow pine).
- These treatments should have the intent of either removing uncharacteristic species, managing or restoring oak and yellow pine species, and increasing structural diversity or reducing the density of vegetation to improve wildfire resilience and wildlife habitat conditions. Commercial treatments can regenerate and release young oak and southern yellow pine in addition to improving the species composition of the overstory and creating open forest conditions with rich herbaceous diversity that benefit a variety of wildlife species.
 - A note on shelterwood harvests: Unless otherwise stated, when we mention shelterwood treatments, we are discussing them in the more traditional understanding of the silvicultural treatment. We encourage the Forest Service to improve understanding of their recommendations by doing the same. What the Forest Service often refers to as a shelterwood harvest is more accurately described as a clearcut with reserves or a seed tree harvest. A shelterwood treatment by definition involves the influence of shade on the composition of the regeneration by favoring mid-shade tolerant to shade tolerant species. A typical shelterwood applied by the Forest Service often leaves a basal area of 20 square feet per acre, which does not provide enough shade to sufficiently influence the regeneration. When the Forest Service calls a clearcut with reserves a shelterwood

harvest, they introduce a level of uncertainty as to what silvicultural treatment they are actually describing. This needlessly introduces conflict during project planning and may have the unintended effect of reducing interest from potential bidders on timber sales.

- While new system roads will not be a part of this project, we are concerned that temporary roads created for this project may not be adequately designed for hydrologic stability and/or effectively put in storage after achieving their intended purpose. This concern arises from the potential need for multiple entries and the effects of an ever expanding road infrastructure. We suggest the Forest Service develop specific sideboards in the project to address temporary roads that could include increased levels of engineer input for roads that include stream crossings, steep slopes, etc.
- Ongoing projects, such as trail proposals and hydrologic improvements need to be considered during this project.

Suggestions

- We encourage the inclusion of stakeholders in project design such that meaningful comments can be offered that are site specific. See the maps below and the shapefile attached for site specific recommendations.
- We suggest taking a balanced approach to treatments to treat a variety of ecozones across elevational gradients. (Eg. Diversify treatments across low and high elevation ecozones). We affirm that whenever appropriate silvicultural treatments should happen in conjunction with prescribed fire activities.
- We recommend project design that incorporates an Adaptive Management approach so that project work can be adjusted over the 10 years of implementation and also incorporates climate change into the Purpose and Need, including the project's contribution towards climate adaptation goals.
- We suggest referencing consensus land allocations as a guide to where commercial timber harvest will have the broadest support (see maps below). Many locations broadly identified in the scoping document have less agreement for commercial timber harvest due to management area allocation, access constraints, terrain, ecological impacts, and social considerations. We recommend that these areas require more site-specific evaluations and recommendations.
- Recreation groups need to be involved early in the design and implementation of this project in order to ensure that damage to existing trails is minimized and mitigated, that any opportunities that arise to improve trails and trail systems can be utilized, and that effective communication to recreation user groups in any affected areas can be created. We encourage outreach to recreation volunteer groups (SORBA, BCH, CMC, CCC, etc) for inclusion of their data sets to see geographically where those areas of overlap might

be. GIS data sets can be overlayed with project targets & could benefit vs obliterate future trail proposals.

Submitted by the Projects Team:

Greg Cooper, The Nature Conservancy of North Carolina

Nick Biemiller, Ruffed Grouse Society & American Woodcock Society

Lang Hornthal, EcoForesters

Manley Fuller, North Carolina Wildlife Federation

Tyler Ross, North Carolina Backcountry Hunters & Anglers

Deirdre Perot, Back Country Horsemen of NC & NC Horse Council

Michael Fisher, Carolina Mountain Club, Councilor, Conservation Policy and Advocacy

Daniel Dunn, Access Fund

Orrin Goure, Columbia Forest Products

Julie White, Southern Off-Road Bicycle Association

Ben Prater, Defenders of Wildlife

Josh Kelly, MountainTrue

Hugh Irwin, The Wilderness Society

Sam Evans, Southern Environmental Law Center

Melissa Patton, Carolina Land and Lakes

Rob Elliot, Evergreen Packaging

Terry Palmeri, International Bicycling Association

Maps:

Pink: Broadly Supported by Partnership for Timber Harvest and Prescribed Fire. These are areas that overlap with Partnership Recommended Matrix and Interface.

Yellow: Broadly Supported by Partnership for Prescribed fire and Ecological Restoration focused silviculture addressing uncharacteristic conditions in structure, composition, and function: Generally overlap with Partnership recommended Ecological Interest Areas, Special Interest Areas, and Appalachian Trail Corridor. May include limited restoration in Backcountry and Inventoried Roadless Areas constrained by the Roadless Rule that avoid long term impacts to roadless and backcountry values.

Red: Broadly Supported by Partnership for Prescribed Fire: These areas include Recommended Wilderness Areas, and Partnership Recommended National Scenic Areas.





