



**North Carolina Department of Agriculture  
and Consumer Services**  
*N.C. Forest Service*



**Steven W. Troxler**  
Commissioner

**Scott Bissette**  
Assistant Commissioner

June 23, 2020

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

Subject: N.C. Forest Service leadership comments on draft Nantahala and Pisgah National Forest Plan

Dear Mr. Nicholas:

I appreciate the opportunity for the N.C. Forest Service to provide comments on the draft Nantahala and Pisgah National Forest Plan. While we have a vested interest in all aspects of the draft plan through our mission *"to protect, manage and promote forest resources for the citizens of North Carolina,"* our comments are focused on topics most closely aligned with our legislative mandates and authorities, as well as the goals and objectives outlined in the North Carolina Forest Action Plan.

Partnerships

- We remain committed to continuing the strong relationship and collaborative approach our two agencies have enjoyed for many decades.
- We believe cooperative efforts between multiple agencies and private landowners leads to a true "All Hands, All Lands" approach. Through this approach, the work being accomplished together is far greater than what could be accomplished by any one organization. What happens on private forestlands adjacent to the Nantahala and Pisgah Forests can directly impact them, and vice versa. We recommend emphasizing strategies that can complement and encourage good forest management on surrounding private forestlands. This relates to a wide range of management issues, including but not limited to fuels reduction, water quality protection, early insect and disease identification, control of exotic/invasive species, and the ability to carry out recommended harvests. The NCFS welcomes the opportunity to help the U.S. Forest Service collaborate with private woodland owners in the vicinity.
- Under the Plan's "Partnering with Others" Goals and Objectives, we recommend adding an objective of "Partnering with the N.C. Forest Service on at least one fuels mitigation project within each geographic area annually." We also recommend adding an objective of utilizing the Good Neighbor Authority and/or Shared Stewardship Initiative to achieve desired forest management conditions.
- Need for USFS engagement on wildfire preparedness with communities surrounding the National Forests has only grown in recent years. We recommend actions to increase wildfire mitigation and resiliency through implementation of Firewise principles and Community Wildfire Prevention Plans, as well as supporting interagency Wildfire Prevention and Education Teams. Continued cooperation with state and local fire services on suppression and prescribed burning is a cornerstone to achieving public safety, property protection and natural resource conservation.

### Active Forest Management / Management Alternative “B” / “Tier 2”

- We encourage the USFS to increase active forest management activities across the Nantahala and Pisgah National Forests. The associated benefits of implementing silviculturally-sound, proactive forest management include increased forest resiliency and health; forest restoration; creation of much-needed early successional wildlife habitat; and positive economic impacts to the surrounding communities and wood product industries. Within areas managed for timber production, clearcutting and even-aged management should remain viable silvicultural options for increasing early successional forest habitats. To the extent possible and allowable, we advocate for an increase in the annual allowable cut with no net reduction in the acreage of land designated as suitable for timber production. Increased timber harvesting in our National Forests would generate a much-needed economic stimulus for a traditionally-underserved region of North Carolina.
- Following a review of the four Management Alternatives outlined in the draft Plan, it appears that “Alternative B” would allow for the most active forest management acres. Adoption of “Alternative B” would most closely align with our organization’s recommendations if recommended “wilderness areas” were significantly reduced. Local county support should play a major role in helping to determine how much additional “wilderness area” is established. We do have concerns with the possible designation of additional lands as “wilderness areas” and/or “old growth,” as this will limit opportunities to manage in these areas and could potentially increase the risk of severe and damaging wildfires in the future. An alternative approach to adding listed acreage with “old growth” characteristics could involve assessing and including stream buffers and areas with large concentrations of threatened and endangered species. These areas may have minimal management opportunities in the future and will likely present “old growth” characteristics over time. Another alternative to addressing the “wilderness designation” debate could involve designating some of the acreage in question as “backcountry management areas” instead of “wilderness areas.”
- “Tier 1” is presented as that level of management currently funded and staffed by the USFS. We believe adopting this same base goal management level for the new plan would not be helpful in achieving the increased active management levels that we’ve recommended. “Tier 2” reflects that level of management anticipated to be available if increased capacity for management is realized from collaborative efforts among the USFS, user groups, and local/state government entities. We understand that collaboration already exists at some levels between the USFS and various user groups. We believe coordinated, expanded collaboration would allow the USFS to achieve base goals reflected in the higher “Tier 2” category, thereby maximizing benefits from active forest management and sustainable recreation. We encourage localized efforts as well as those collaborative opportunities mentioned in this letter’s “Partnerships” section to realize these higher-level benefits. We encourage the adoption of “Tier 2” base goals for USFS personnel, with any other collaboration with outside agencies representing an extension of those base goals.
- We believe the N.C Forest Service’s call for an increase in active forest management on National Forests is directly in line with the direction U.S. Department of Agriculture Secretary Sonny Perdue provided in his 6/12/20 memo to the Chief of the USFS.

### Forest Health / Insect & Disease

- Early detection and proactive containment/eradication of insect or disease outbreaks is critical to the protection of all of North Carolina’s forests. The last several decades have yielded numerous examples of the widespread forest impacts that can occur unless these stressors are stopped early on. The NCFCS recommends a high emphasis on early detection and aggressive mitigation to prevent such outbreaks from expanding past the point of control. NCSF welcomes the opportunity to collaborate on such efforts and

believes our related efforts with private landowners will in turn help to protect woodlands on the National Forests.

#### Habitat Improvement and Restoration

- We support an increased emphasis on fuels and understory management accomplishments through prescribed burning, mechanical treatments and timber harvests.
- The North Carolina Forest Action Plan, along with other partner initiatives, calls for increased efforts in restoring a wide suite of declining forest species and habitats of concern. These include but are not limited to spruce fir; shortleaf pine and shortleaf pine & oak; mixed oak forest; pitch and table mountain pine; eastern and carolina hemlock; and high-elevation bald communities. We recommend focused objectives to increase the number of improved and established acreage for these forest types, and we would welcome the opportunity to collaborate on their restoration.
- Proactively identifying and improving critical habitat for at-risk species could be one of the keys to avoid having these species possibly listed as threatened and/or endangered. We believe active management practices such as prescribed burning and harvesting for early successional habitat creation should be emphasized to help achieve identified wildlife management goals. Successfully keeping such at-risk species from needing to be listed could benefit forest landowners statewide in terms of avoiding additional forest management restrictions. We encourage close coordination with the N.C. Wildlife Resources Commission and the recommendations outlined in the North Carolina Wildlife Action Plan.

I applaud you and your staff for all the work that has gone into this plan revision thus far. Please be assured that the N.C. Department of Agriculture and Consumer Services and the N.C. Forest Service stand committed to continuing our long tradition of partnering together with the USFS to ensure that all of North Carolina's forestlands are protected and managed for the benefit of all citizens. Please feel free to call on me should you wish to discuss our comments in greater detail.

Sincerely,



Steven W. Troxler  
Commissioner of Agriculture



Scott Bissette  
Assistant Commissioner