



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



Scott Bissette
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April 28, 2014

Ms. Kristen Bail
Forest Supervisor, National Forests in NC
USDA Forest Service
160 Zillicoa Road, Suite A
Asheville, NC 28801-1082

Subject: North Carolina Forest Service comments during the scoping phase of revisions to the Nantahala and Pisgah National Forest Plan

Dear Ms. Bail:

I appreciate the opportunity for the N.C. Forest Service to provide comments during this phase of the Nantahala and Pisgah National Forest Plan revision process. While we have a vested interest in all aspects of the Plan through our mission *"to protect, manage and promote forest resources for the citizens of North Carolina,"* we have limited our comments during this scoping phase to those areas that most closely align with the "North Carolina Forest Service Strategic Plan, 2013-2016," "North Carolina's Forest Resources Assessment, 2010" (NC Forest Action Plan), and our legislative mandates and authorities. We remain committed to continuing the strong relationship and collaborative approach our two agencies have enjoyed for many decades.

The decline in early successional forest habitat, a reduction of acres in young forest age classes and an increase in older forest age classes has been a documented trend throughout much of Western NC for well-over a decade. Your assessment identified these conditions and trends to be even more prevalent on national forest lands. While much of this can be attributed to the influences noted in the assessment, we feel there are opportunities to re-balance the age class distribution of managed forest areas through thoughtful planning and a reevaluation of clearcutting as viable and necessary regeneration method. The biennial Timber Product Output surveys our agency conducts, in collaboration with the USDA Forest Service Southern Research Station, indicate a decline in the number of primary wood processing mills in Western NC over the last twenty years. The decline in harvest volumes from national forest lands, along with inconsistent and uncertain harvest levels from year to year have contributed to this lost capacity, leading to disruptions along the entire forest products supply chain. Continued harvest reductions and increased reliance on intermediate harvests and uneven-aged silvicultural systems will have a negative impact on the wood products manufacturing sector and the communities that rely on this sector for economic and social well-being.

The N.C. Forest Service has concerns about the possible designation of additional National Forest lands as wilderness areas. The designation of additional acreage will reduce the areas where prescribed burning or mechanical treatments to reduce the buildup of flammable forest fuel can be applied. This will place more acreage and potentially private property at risk for larger and more damaging wildfires. Increasing wilderness acreage will also make wildfire management and suppression much more difficult and costly by limiting access and tactical options for suppression.

The N.C. Forest Service would also like to see an increased emphasis on fuels management through prescribed fire; engaging communities for education and outreach in the areas surrounding the national forest lands; assistance while working toward resilient communities with Community Protection Plans, Firewise, and Community Wildfire prevention Plans; and cooperation with state and local fire and services on suppression and prescribed burning.

Threats to forest health are addressed adequately throughout the document. Much of the discussions on forest health are parallel with Chapter 3a. and 3c. of "North Carolina's Forest Resources Assessment," 2010. Relatively speaking, native and naturalized pests and invasive plant species that threaten forests and other ecosystems in the state are better understood than more recent introductions (for example, hemlock woolly adelgid) and imminent threats to the forest. There are great opportunities for Pisgah and Nantahala National Forests to partner with the N.C. Forest Service, other state agencies, and allied federal agencies to slow the spread of these new threats and proactively provide "early detection and rapid response" to findings of new infestations—it is easier and less expensive to control small populations of invasive pests than to manage larger infestations. Many of these new threats to forest health, including emerald ash borer, gypsy moth, dogwood anthracnose, Asian longhorned beetle, and insect vectored thousand cankers disease, laurel wilt, and beech bark disease may be spread into the National Forests through the movement of firewood from other areas. Outreach to forest user groups, outreach and signage at federal campgrounds, and providing "don't move firewood" messages on campground and reservation websites will create awareness both for forest users of their role in slowing the spread of these pests into the forests, and for National Forest staff to be on the lookout for firewood vectored threats to forest health.

We agree that prescribed fire is a key management activity for the health, restoration, and maintenance for many of the ecosystems in the NFS. We encourage the USFS to include increased emphasis in the new plan to accomplish more burning on NFS lands and continue the increasing trend identified in the assessment.

The assessment identifies three terrestrial ecosystems, Shortleaf pine, Pine Oak Heath, and Spruce-Fir, that the N.C. Forest Service has also identified as ecosystems in decline and in need of increased emphasis for management. NCFS endorses restoration plans for these declining forests types. We agree that partnerships are essential to reverse the declining trend for these habitats. We look forward to working with the USFS and other stakeholders to identify suitable sites and develop management techniques that can be applied to both public and private lands.

We are encouraged with the improving trend that documents the effectiveness of BMPs to protect streams, riparian areas, and water quality during timber harvesting and prescribed burning practices. We trust these findings are used to implement much needed management practices on the Nantahala and Pisgah National Forests.

Please be assured that the North Carolina 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 18.6 million acres of forestlands are protected and managed for the benefit of all citizens. Please don't hesitate to call on me should you wish to discuss our comments in greater detail. We thank you for the opportunity to share our interests and suggestions.

With warmest regards,



Scott Bisette
Assistant Commissioner