



To: Forest Supervisor James Melonas and Grandfather District Ranger Nick Larson

From: Josh Kelly, MountainTrue

Re: GAP Project EA

Dear James and Nick,

I am writing to provide feedback on the GAP Project, which I am hopeful will realize many benefits to the people and forests of Western North Carolina and beyond. As you know, I am an ardent supporter of the Collaborative Landscape Restoration (CFLR) Program, and I deeply believe in collaborative stewardship of public lands. I am also an enthusiastic champion of the human use of fire to mimic natural fires, often under safer conditions than wildfires burn, in order to steward native ecosystems and the species that depend on them. To those ends, I have been eager to see the goals of the GAP Project – to reduce wildfire risk and restore fire adapted vegetation – come to fruition.

In the more than two years this project has been in development, I and other participants in the Pisgah Restoration Initiative have attended numerous meetings. I have spent many days in the field and used remote sensing to locate high priority areas for stewardship under the project, and I have provided my opinions on the project at every stage. As the originator of the Grandfather CFLR Project and an enthusiast of our native biodiversity, I am as invested in seeing the GAP Project be successful as anyone. Unfortunately, I find myself deeply concerned that GAP is in danger of failing procedurally, collaboratively, and materially.

Throughout the development of the project, I was assured that the final product would be site specific. I was told that restoring fire adapted vegetation would be the focus of the entire project, and I was assured that the project would be unanimously supported by the Pisgah Restoration Initiative (PRI) Collaborative. I find myself at the EA stage of the process, ostensibly the last chance the public will have to review the project, and none of those things have yet come to pass.

Because the GAP Project is so undefined at this stage, and because it is so permissive, I have many suggestions that are needed to ensure that the project is both successful and avoids collateral damage that could be harmed by timber harvest and road construction to land, water, wildlife, and recreation. These suggestions are reiterated in the comments by SELC that MountainTrue cosigned. However, I want to provide the rationale for these ideas here, in my own voice.

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## **The GAP Project Must Be Site Specific and Time Bounded in Order to Allow Meaningful Public Comment**

I understand that this project is at a scale that is larger than has ever been attempted by Pisgah National Forest. I understand that there is time pressure to reach a decision and accelerate implementation of the PRI. However, that does not excuse cutting corners in planning, public notification, or communication with the PRI collaborative. In order to both keep the GAP Project moving at an efficient pace and to meet your responsibility to notify the public and share stewardship with the PRI collaborative, I encourage you to reconsider the current course of the project. The most efficient way to proceed, in my opinion, is to pivot to a Programmatic EIS with tiered EAs, as was suggested at the scoping phase of the project. The other alternative would be to do site specific analysis on all activities at this stage, which would delay implementation to an unacceptable level in my opinion. By using the Programmatic EA framework, the project could move forward under much the same framework as is currently planned, with the addition of a simple, 30-day public comment period prior to the implementation phase for specific areas.

At the present time, the GAP Project does not disclose enough site-specific information, or share enough of the implementation strategy to meet the Forest Service's obligations under NEPA. The EA identifies over 29,000 acres of "Vegetation Management Areas" (VMAs) that could be logged on a spectrum of intensity ranging from not-at-all to a clearcut, but the EA does not disclose which areas will get what treatment. Species composition, hydrology, slope, aspect, access, and more are important for determining whether an action as impactful as commercial logging occurs, and yet none of those details are yet available to the public or internally to the Forest Service. Likewise, the location of road construction has not been determined. Because the Forest Service does not hold a monopoly on local knowledge or scientific expertise, it is important that the public and other agencies be consulted for such consequential decisions. It's not only the right thing to do, but it's legally required, and at this stage, the GAP Project does not hit the mark.

## **The Development of Timber Harvest Priorities Has Not Been Sufficiently Collaborative**

In 2022 I provided over 2,000 acres of polygons that I thought were high priority for silviculture in the GAP Project. I assumed that others, internally and externally, were providing ideas as well, and I assumed that there would be an opportunity for the entire PRI collaborative to discuss the proposals and to prioritize the work together. Instead, it is my understanding the Forest Service hired The Nature Conservancy to complete a desktop exercise, the result of which is the 29,000 acres of potential timber harvest and silvicultural activities that were presented in the EA.

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Relying so heavily on a single partner without peer review from the rest of the collaborative has the potential to create unnecessary conflict. This is especially true when a substantial portion of the proposals are controversial. Now I don't know for sure, but my guess is that road construction and timber harvest on the Appalachian Trail, in Backcountry Management Areas, in Special Interest Areas, in NC Natural Heritage Areas, in potential old-growth forest, and in eligible Wild and Scenic River Corridors is not broadly supported – especially without strong, site specific justification, of which there is none. And it's not like these types of activities are minor – they encompass over 4,000 acres of potential logging. I personally question if the juice of trying to work in those types of conditions is worth the squeeze. If the Forest Service does believe each of those acres to be a priority, it is imperative that the site-specific justification be shared with the public and that there be consensus support from the PRI collaborative. In the absence of strong, site specific needs for ecological restoration, MountainTrue is opposed to road construction and commercial timber harvest in the aforementioned controversial areas.

### **The GAP Project Must Focus on Fire Adapted Vegetation**

There have been robust conversations within the PRI collaborative about whether Mesic Oak and High Elevation Red Oak Ecozones should be featured in the project. My opinion was and is that unless those forest types have uncharacteristic vegetation, they should be excluded from timber harvest activities. Clearly, I was not persuasive on that point because I now find that not only are the mesic oak ecozones a subject of the project, but over 10,000 acres of Cove Forest are included in VMAs that may be logged.

While there is little data available, it can be argued that mesic oak forests are fire adapted, because in the absence of fire oaks tend to decrease while shade tolerant trees and shrubs increase. But in the case of mesic oak forests, it cannot be said that they are a significant wildfire risk. They may burn, but generally the fuels consumed consist of leave litter and twigs. Even during the extreme drought of 2016, mesic oak forests saw almost no stand replacement fire, unlike dry oak forests and yellow pine forests. Furthermore, closed canopy forests are less receptive to fire than open canopies because they hold in more humidity and are more shaded and are dried less rapidly by direct sun. ***Any logging done in mesic forests, including mesic oak forests, only increases wildfire risk*** by removing large, fire resistant trees, increasing sunlight that dries fuels, and leaving logging debris to enhance fuel loading.

In contrast to mesic oak forests, cove forests are not at all fire adapted. They do not decline in the absence of fire and some characteristic species of coves can be harmed by fire. Logging in cove forests tends to make them more susceptible to wildfire, increases the dominance of poplar, has a high risk of introducing non-native invasive species, and is incompatible with the premise of the GAP Project. However, cove forests do grow large and commercially valuable trees, which is why the economic incentives will always favor logging cove forests. The CFLR program provides funding to help pay for the

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type of ecological restoration that does not normally pay for itself. Since cove forests are not fire adapted and are the most revenue positive forest type to log, they should not be a part of the GAP Project. The GAP EA states that logging in cove forests will be "incidental" (p. 17), but places no limits whatsoever on logging cove forests. My recommendation is to use a combination of GIS and field review to ensure that logging in cove forests is indeed incidental. First, use the Ecozone Model to identify and exclude contiguous areas of Cove Forest modeled at larger than two acres. Second, create a field review process to screen for areas of Cove Forest that may have been missed by the Ecozone Model. Third, create a design criterion that states that areas of Cove Forest larger than two acres will not be mechanically or chemically treated as part of the GAP Project. I have also submitted via CARA and email a spreadsheet of the VMAs with either > 50% cove forest or more than 40 acres of cove forest. This analysis was completed with a tabulate intersect function that combines raster data with vector data, leading to errors up to 2% of the total area, which is an acceptable level of accuracy in my opinion. These units represent those that are most concerning at this stage as far as potential negative impacts to cove forests, and in total there are over 200 of them. They are by far and away not the only areas of concern, but are included here to demonstrate the magnitude of the problem at this stage in the project.

### **The GAP Project Must Identify and Conserve Old-Growth Forest**

The GAP Project will be part of the Pisgah Restoration Initiative, which is funded by the Collaborative Forest Landscape Restoration Program. We note that Title IV of the 2009 Public Lands Omnibus Act that created the CFLR program states as one of its eligibility criteria requires that a project:

"(D) fully maintains, or contributes toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health and retaining the large trees contributing to old growth structure;"

<http://www.fs.fed.us/restoration/documents/cflrp/titleIV.pdf>

So, in order to comply with the CFLR program, the GAP Project must not degrade old-growth forest. There are many areas included in the project that have not been inventoried for old-growth and have high potential to contain it. As such, it is impractical to list them all. Instead, I recommend that all stands proposed for timber harvest be evaluated for their old-growth age structure, and if forests that are consistent with the Region 8 guidance are encountered, that activities be modified to retain all old-growth trees and enhance old-growth characteristics.

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## **The Local Community Needs the GAP Project to Be Successful and Not Needlessly Push the Boundaries of Consensus**

When attending the GAP open houses, I heard again and again that from Forest Service staff that it was impractical for all of the Vegetation Management Areas to be treated. I think that is a realistic assessment of the project and, as such, I think there is room for the Forest Service to be less ambitious in its pursuit of timber harvest in controversial areas. There is always the potential that actions have unanticipated, negative consequences. There are situations where that is acceptable, and those where it is not. When dealing with treasured resources like recreational infrastructure the Forest Service will win more support by being cautious and conscientious. I have read the comments of our recreational partners, and MountainTrue supports the comments of Carolina Mountain Club, TN Eastman Hiking Club, Back Country Horsemen, and Pisgah Area SORBA.

In addition to sensitive recreation locations, there are sensitive ecological and cultural settings to attend to and in these cases the Forest Service would be best served by exercising caution. Even if 15,000 acres of VMAs resulted in treatment rather than 29,000 acres, and all sensitive resources were adequately protected, this would likely be a huge benefit for the forest, local communities, the Forest Service, and its partners. Pushing the envelope too much would likely not only make restoration activities more difficult to communicate, but end up limiting the full scope of the project more than a careful approach.

Preparing our communities and our forests for climate change is one of the most important and impactful things the Forest Service can do at this moment in time. There are portions of the GAP Project that are likely to achieve those goals and others that could work counter to them. Stewarding our dry forests with thinning and fire works towards climate resilience by preparing for wildfire. Harvesting mesic forests and building roads could work against climate resilience by introducing invasive plant species and increasing the impact of floods. I appreciate the ambition of the Forest Service to have a landscape-scale impact on the restoration of fire-adapted vegetation and reducing wildfire risk, and I want the parts of the project that clearly relate to those goals to proceed efficiently. MountainTrue will loudly champion a project that is more clearly focused on those goals. I want to be crystal clear that MountainTrue does not support the project in its current form and will actively oppose the project if remedies to the problems identified are not implemented. Pisgah National Forest is beloved by millions and a sacred trust for current and future generations, and deserves no less than excellent care and stewardship. Thank you for taking the time to carefully read these comments and I look forward to being a part of solutions for the issues that have been identified with the project to this point.

Sincerely,

Josh Kelly  
Resilient Forests Director  
MountainTrue

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