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Cameron Ingram, Executive Director

## **MEMORANDUM**

TO: James Melonas, Joby Timm, Michael Wright, and Robert West

Forest Supervisors of National Forests of North Carolina, George Washington and Jefferson National Forests, Cherokee National Forest, and Monongehala National

Forest

FROM: Andrea Leslie, NC Wildlife Resources Commission India Solucie

**Habitat Conservation Program** 

DATE: September 5, 2024

SUBJECT: NCWRC comments on the USFS Red Spruce Restoration Project Scoping Record

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) reviewed the US Forest Service's (USFS) Scoping Record for the Red Spruce Restoration Project, which proposes management activities that would restore Red Spruce in suitable habitat locations or former Red Spruce locations in the Pisgah and Nantahala National Forests (NFs), George Washington and Jefferson NFs, Cherokee NF, and Monongehala NF. Comments from the NCWRC are offered for your consideration under provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the North Carolina Environmental Policy Act (G.S. 113A-1 et seq., as amended; 1 NCAC-25).

The project prioritizes Red Spruce restoration work in targeted high elevation areas across the national forests noted above. Activities would include the following planting and release activities:

- Planting
  - Underplanting in hardwood-dominated forests
  - o Planting in open fields or legacy mine lands
  - o Planting in riparian and floodplain corridors around wetlands
- Release
  - o Removing hardwoods around mid-story Red Spruce by hand or via herbicide
  - Removing neighboring hardwoods and structurally improving forests with mechanical equipment

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NCWRC supports the project, as it should restore spruce-fir habitat that numerous wildlife species (such as the Carolina Northern Flying Squirrel, *Glaucomys sabrinus coloratus*, US and NC Endangered) are dependent upon. However, we recommend that restoration plantings be prioritized outside of old field settings that are being actively managed to maintain high elevation openings in North Carolina. If these areas are considered for restoration plantings, we ask that the USFS collaborate with the NCWRC to determine the extent of this work.

Thank you for the opportunity to review and comment on this project. We greatly appreciate the USFS' efforts to improve wildlife habitats in the district. Please feel free to contact me at (828) 400-4223 if you have any questions about these comments.

ec: Chris Kelly and Ryan Jacobs, NCWRC