



Re: Red Spruce Restoration Project Scoping

September 5, 2024

Dear Jessie Howard,

Thank you for the opportunity to comment on the Red Spruce Restoration Project. The Appalachian Trail Conservancy (ATC) is extremely fortunate to count the US Forest Service as a steadfast partner in the cooperative management of the Appalachian National Scenic Trail (ANST), and this partnership, when combined with other agencies such as the National Park Service, was also instrumental in forging the ever-critical management guidelines laid out in the ANST Comprehensive Plan. The A.T. is one of America's most treasured natural legacies, and our joint oversight of this resource has never been more important.

The Appalachian Trail Conservancy (ATC) is very supportive of the Red Spruce Restoration Project, and we are very honored and grateful to have collaborated with the Southern Appalachian Spruce Restoration Initiative (SASRI), National Forests in North Carolina and other partners to get to this moment.

ATC would like to see close alignment with Red Spruce Technical Advisory Board's (RSTAB) recommendations, with the following additional thoughts and considerations:

- ATC believes there are extremely limited opportunities for commercial utilization of hardwoods for this restoration work, however opportunities may exist during the life of the EA. If commercial utilization is included in the EA, ATC would like to ensure it is strongly aligned with the purpose and need of the project, and that there are strict guidelines in the implementation checklist that protect TES and this G1 ecosystem. ATC doesn't have concerns with utilization of spruce as tone wood or for other niche uses if the extraction is not detrimental to the system.
- ATC recognizes and respects that SASRI partners do not recommend including restoration activities with ground disturbance (i.e. use of heavy equipment) on Southern Appalachian NFs. However, there could conceivably be a scenario where such equipment could be utilized if the proper protections and protocols are in place and included in the implementation checklist.

Additionally, ATC would like to:

- Ensure planting does not occur at natural balds and that consultation with NCWRC or other relevant managing partners occurs when areas that provide high elevation early successional habitat are being considered for spruce restoration
- Help develop and inform the development of the implementation checklist in partnership with SASRI
- See proper site design criteria articulated



- Have project work planned in conjunction with SASRI or CASRI depending on location and jointly how stakeholder check ins will occur at the time the implementation checklist is addressed

ATC is very excited for the continuation of the strong partnership between the USFS, SASRI, and all the other partners involved as we move forward with spruce restoration in the Southern Appalachians.

Sincerely,

Franklin Tate
Regional Director, South
Appalachian Trail Conservancy