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First name: Rob

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Organization: Clay County Commissioners

Title: County Commissioner

Comments: Clay County

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Dear Mr. Arney,

Clay County has received the National Forests in North Carolina release of the Nantahala and Pisgah NF's revised forest plan. It purports to partner with others to sustain healthy ecosystems, connect people to the land, and provide clean & abundant water. We have reviewed the Draft Record of Decision (DROD) and share the following comments important to our Board and our local citizens.

Clay County is among those counties in southwestern North Carolina that have significant Nantahala National Forest Lands (NFL) within its boundaries at approximately 40% of its total land base. Having such a large portion of our land base in NFL's makes it imperative for us to seek economic benefits from the forest beyond the PILT funding that partially supports our school system. We recognize the economic and social contribution of the forest to provide benefits for recreation and tourism, outfitters and guides, forest product industries and quality of life in our surrounding communities.

We support active forest management efforts to create early successional forests, open forest conditions and control of non-native invasive species. We expect to see an increase in the pace and scale of timber harvesting and silvicultural contracting to play a significant role in accomplishing those desired conditions for the forest while enhancing local employment and supporting local small business.

Public involvement has been lengthy and arduous since the 1994 Forest Plan amendment to this draft final revision process. Clay County has consistently declared our objections regarding the Forest Plan at the following meetings. Commissioner Clay Logan, representing Clay County, attended the public meetings held in Murphy, NC on 3/5/13, 12/3/13, 10/30/14, 9/2/16, Brasstown Community Center on 8/8/17 and in Asheville, NC on 11/1/19. The Forest Supervisor met with the Clay County Manager, and the Clay County Commissioners on 4/27/17. To our knowledge these objections have not been recorded in the Forest Plan meetings and we would like to request that they be.

Clay County does not support the designation of additional wilderness areas or wilderness study areas in our County as specifically noted in your draft ROD. It is sufficient that the existing forest vegetation conditions overlaying those designated lands could achieve over time "old growth characteristics" per revised plan. No more.

Clay County does not support old growth management/networks in lands outside designated wilderness, research natural areas and corridors classed "wild" of designated wild and scenic river areas in our county. We oppose further Old Growth Management outside those lands. The passive approach for old growth on additional wilderness areas of wilderness study areas remaining idled from active management ordains impact from natural forces of wild, wildfire, flood, native and non-native insects and diseases depredation. You have not far to look around our County to see the loss of Eastern Hemlock from a non-native insect over the past decade. This has

left large swaths of dead standing and falling woody debris posing a safety hazard to the public and firefighters. We will never see old growth hemlock. Also, close to our County memory are the significant impacts the 2016 fall wildfires had on our County and its residents adjacent to these idled lands.

In closing, it is our wish to manage the expectations of our citizens to avoid unnecessary complaints or concerns raised as you move to finalize this Forest Plan. Please keep us informed through our local District Ranger Andy Gaston of any changes, issues or concerns that we should be aware of.

Despite our stated objections and support for active management, thank you for your efforts in finalizing the land management planning effort. This will be an opportunity for you to pivot and to expend tax dollars on implementation action to achieve forest plan goals and objectives rather than the arduous and lengthy forest planning process. We will have challenges but look forward to participating with you in implementing work on-the-ground to achieve the promise of sustainable forests for the future.

On behalf of the Clay County Board of Commissioners,

Dr. Rob Peck, Chairman

Lead Objector

Clay County Government

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