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Comments: There's not a clear connection between project-level goals and objectives, need for action, and proposed project activities. RGS & AWS strongly believe that commercial timber harvesting is the most cost-effective means to achieve the GAP Project's objectives to reduce the risk of wildfire and restore fire adapted forest ecosystems, and to support healthy forests and abundant wildlife more broadly.

This project will likely consume a large portion of the Forest Service's current capacity, both on project planning and implementation over the next 5-10 years. The project's goals and objectives, while needed, are not all encompassing of active forest management objectives from the 2022 Revised Forest Plan.

Increasing forest age class and structural diversity is a fundamental component of forest climate adaptation frameworks. Diverse forests are more resilient to disturbances that are increasing with climate change, including catastrophic wildfire events, drought, pests, and diseases.

Ruffed grouse population abundance has declined 71% since 1989 in the Southern Appalachians. The loss of young forests is the primary driver of this decline. There are currently only 1.3% young forest conditions across the Nantahala-Pisgah National Forests in North Carolina.

We are concerned that the focus of this project will delay or prevent habitat restoration in more mesic ecological zones, which could have dire negative impact to at-risk forest wildlife species that are declining at rapid rates.