

Data Submitted (UTC 11): 8/6/2024 4:27:04 PM

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Comments: I object to the Pisgah Restoration Initiative, particularly the GAP Project for several reasons. I request revisions to the plan because there is no clearly stated duration for the project in the draft environmental assessment. Without a clear project duration, the environmental impact of management activities such as timber harvest, prescribed burning, and temporary road construction and other stated activities is impossible to assess. Please include a timeline or a duration estimate for the GAP project so that environmental impacts are estimable.

Additionally, locations for logging activities are not clearly defined. A lack of specificity around exact locations for various management activities like burning and harvesting lacks clarity and transparency. A stated goal of the GAP Project is to reduce wildfire risk. However, the project identifies logging as a potential management activity in cove forests - moist forests that are not fire-adapted and do not pose any significant wildfire risk. The GAP Project proposes over 10,000 acres of potential timber harvest in cove forests, an activity directly opposed to the stated goals of reducing fire risk. Please exclude all cove forests from logging and fire management activities, as those activities do not meet stated goals in those communities.

Also, allowable management activities are poorly defined for areas with saw timber versus areas without saw timber. In the GAP Project proposal, there is no distinction between allowed management activities in areas with sawtimber and areas without sawtimber. Both areas occupy over a total of 29,000 acres, and temporary road construction, tree removal, and the same harvest methods can cause extensive erosion and habitat destruction. Please make a distinction based on whether trees will be removed from the site, which will clarify allowable management activities in a particular site.

Lastly, the GAP project proposes to log in highly controversial sites for commercial timber harvest, including 1500 acres along the Appalachian Trail, 1600 acres of backcountry, and areas with unique and sensitive ecological values. Logging in these areas could damage these values through road construction and the presence of heavy machinery. Please amend the project to eliminate commercial timber harvest or road construction along the Appalachian Trail, in Backcountry Management Areas, or in highly valued ecological Special Interest Areas.

Overall, your proposal lacks specificity on what kind of management activities will happen and where. The GAP Restoration Project promotes wildfire risk reduction and habitat restoration but lacks clarity on site-specific management activities and timelines. Approval for this project should not be awarded before determining where roads will be built, what type of timber harvest will occur where, what the harvest methods will be, which areas will be burned, and before biological and archeological surveys have been completed. Please provide more information and complete more analysis before approving the GAP Project.