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Comments: Please accept the following comments from the U.S. Fish and Wildlife Service's Asheville Ecological Service Field Office (Service) on the Grandfather, Appalachian, and Pisgah (GAP) Restoration Project.

Under 1.2 Purpose of and Need for Action, the stated purpose of the GAP is to restore fire-adapted ecosystems and reduce wildfire risk for local communities by implementing fuels reduction and vegetation treatment activities across portions of the Forest. However, under 3.4.1.1, several ecozones in the "affected environment" are not fire-adapted - acidic and rich cove, floodplains, northern hardwood, and spruce-fir forest. It is unclear why these ecozones are included if the purpose and need for the action is restoration of fire-adapted communities. This accounts for approximately 42% (well over 100,000 acres) of the affected environment proposed for the GAP.

Additionally, on Aug. 9, the Service received a scoping request for the project known as the Red Spruce Restoration Project. This proposed project includes multiple areas comprised of spruce-fir forest. It is our assumption that there are some geographical areas of overlap between this project and GAP.

Unless inclusions of above-identified ecozones can be directly tied to restoration of fire-adapted ecosystems, the Service recommends removing those ecozones from the project proposal and reducing the amount of affected environment proposed. If the ecozones and acreages are removed, we recommend the analyses in the EA be updated to reflect the changes as the details and analyses provided in the EA will likely be used in development of a Biological Assessment for the purposes of section 7 consultation.

Thank you for the opportunity to provide comments.