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Comments: In the 25 years I have been working to slow the spread of non-native invasive plants on the western slopes of Seven Mile Ridge and in the South Toe River Valley in Yancey County, I have watched asiatic bittersweet, autumn olive, miscanthus, Chinese lespedeza and Japanese knotweed join and overtake kudzu and multiflora rose as the dominant non-native invasive species that threaten the integrity, and in some areas, the very existence of healthy, bio-diverse native forest plant communities.

I am concerned that the 327 acres of commercial timber harvest and 627 acres of non-commercial timber harvest proposed in the immediate vicinity of the NC Natural Heritage Program's Seven Mile Ridge Wetlands Natural Area have the potential to permanently devastate the unique plant community contained within this Wetlands Natural Area.

USFS's Victor Place and other, privately-owned fields contiguous with the proposed timber harvest areas on Seven Mile Ridge in Yancey County are overrun with non-native invasive plants, including but not limited to asiatic bittersweet vine, autumn olive shrub, and miscanthus grass. Because Victor Place and other fields are kept open by mowing, their large, well-established populations of bittersweet and autumn olive grow in full sun, further boosting the productivity of these already extremely fertile seed-producers. Birds feed on these seeds in the fields, delivering them into the forests (along with a dollop of all-natural fertilizer).

Based on my informal survey in the spring of this year, the intact native forest community between the Seven Mile Ridge Wetlands Natural Area and Victor Place appears to be serving as an effective buffer, keeping invasive plants from establishing significant populations outside the boundaries of the mowed areas. The shade of the undisturbed canopy of the forest appears to be holding in check non-native invasive plant seeds that germinate, confining them in the understory, where they do not get enough light to flower or set seed in significant quantities. However, if the timber harvest goes forward as proposed in the GAP Restoration Project, the disruption of the canopy will disturb the solid and allow light into the forest floor, releasing the well-established invasive plant populations in Victor Place to spread into areas disturbed during timber harvest. Unlike Victor place, in which mitigation of invasives is theoretically possible through a rigorous regimen of mowing and/or burning, there is no economically feasible way to effectively control the spread and growth of invasive plants in the context of forests that are regenerating after timber harvest. A wetland area, like the Seven Mile Ridge Wetlands Natural Area, with a disturbed canopy, in close proximity to an area with well-established, sexually mature, highly productive populations of invasive plants is even more vulnerable to colonization by invasive species than other forested areas, since moist soil enhances germination and speeds growth of plants which take advantage of forest disturbance, especially non-native invasive plants.

Please rescind the Project's proposed commercial and non-commercial timber harvests in and near the Seven Mile Ridge Wetlands Natural Area and all other NC Natural Heritage Program Natural Areas. In addition, please review the GAP plan to evaluate the proximity of proposed timber harvest areas to poorly managed open fields and other areas that are probable sites of large, well-established populations of non-native invasive plants. Because timber harvests in the vicinity of areas of reproductively mature non-native invasive plant populations would vastly accelerate the spread of invasive plants, they would permanently compromise the capacity of those areas to regenerate a healthy native plant community. Instead, please prioritize keeping existing forest canopies intact in areas where they are serving as our most effective and most economical mechanism to continue controlling the spread of non-native invasive plants within the Grandfather, Appalachian and Pisgah Districts of the US Forest Service Lands.

Thank you.