

Data Submitted (UTC 11): 8/13/2024 3:45:14 AM

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Organization: Fish and Wildlife Conservation Council

Title: Chairman

Comments: To District Rangers, Larson ,Barnhart ,Casey .

First off thank you for the opportunity to comment on this project. Our council has been involved from the beginning of GAP and have followed the progression over the past few years . It is exciting to see it in the final stages and we look forward to seeing the restoration implemented. With that said we do have comments on the project we would like to state.

First we feel the need for restoring fire adaptive communities is just that restoration. That defining commercial and non commercial timber harvest is irrelative to the need. Composition of trees is a huge factor in preparing our forest in being fire adaptive. Popular and Maple have over taken much of the forest , harming mast producing fire dependent trees. While burning young stands , hot fires and yet to be seen long term burning may slowly turn this phenomena around , timber harvest and regeneration is a viable tool. We have witnessed when harvest is listed as commercial it often is viewed by the public in a negative light. With in the guidelines of the forest service we have seen the definition of commercial put unduly burdens on how the restoration was administered , even having to leave quality wood to rot and go to waste in a non- commercial sale. Current timber markets in WNC have been volatile at best and often non-exist with the closing of the Canton Mill. We feel its time to fully embrace restoration and not limit commercial vs non- commercial status . Creating flexibility by combining these two harvest titles and allowing the harvest to meet the restoration need will allow any market or non-marketable timber to be utilized as best use , either commercially or not.

Second we appreciate the broad reach of the EIS this project allows. We often see the capacity of the Forest Service suffer under too many small projects. While we fully understand and appreciate the difference of Eco systems within these ranger districts . We feel the similarity of issues and restoration needs often mimic each other across the districts and that a broad EIS can and will benefit the need of restoration in a timely efficient manner. As a wildlife advocate and observer we have witnessed over the past few years of expansion of prescribed fire on these districts , a positive reflection in wildlife habitat improvement . While this benefit is much needed for wildlife the timely pace of this restoration is overdue for our local communities and their safety. Please continue using the best science in a manner that allows a pace and scale to move this project forward as the need is overwhelming and efficiently is a must to make GAP successful.

Third . Regeneration is a critical component of having resilient forest. The mono- cultures of popular and maple have harmed our wildlife populations and put our forest and watersheds in jeopardy. Often regeneration is viewed negatively by the public who may not even know the difference in tree species and their role in the forest. While regeneration is only a small portion of GAP , our council views it as extremely important tool in this restoration effort. We value not only the effort to enhance our mast producing trees but value the young forest types often produced by regeneration. With regeneration and increased fire we see these areas that are most lacking in wildlife habitat become productive once again , all while making the forest healthy and safer for surrounding communities.

Fourth. Our council supports the use of forest roads for access and fire lines. We stress the importance of 25-50ft daylighting of these roads used for fire lines. This daylighting will have positive effects on prescribed fire efforts and immediate benefits on wildlife . If this technique is not prescribed thru out these burn units we would like to see some implemented as to monitor their benefits.

As grass roots organization FWCC recognizes the importance of partners to implement such a landscape scale project. Our forest and wildlife managers , USFS and NCWRC are key for us to have faith this project will evolve

in a productive , professional manner. While other partners including FWCC have played critical roles in forming GAP , we want to make sure micro managing doesn't overwhelm the progress. Our council has faith in both the USFS and NCWRC to move this restoration forward and that partners help move the work forward and not hinder this much needed work.