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Title:

Comments: Biologists with the North Carolina Wildlife Resources Commission (NCWRC) reviewed the US Forest Service's (USFS) Environmental Assessment (EA) for the Lickstone Project, which proposes management activities that include timber harvest, aquatic barrier removal, non-native invasive plant removal, prescribed burns, rehabilitation and creation of wildlife openings, and temporary/permanent road construction and decommissioning in the Pisgah National Forest in Haywood County. Comments from the NCWRC are offered for your consideration under provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the North Carolina Environmental Policy Act (G.S. 113A-1 et seq., as amended; 1 NCAC-25).

The project's foci are to move structure class towards the natural range of variation, restore tree species distribution that is appropriate for ecological zones, create permanent wildlife openings to move toward 2023 Forest Plan desired conditions, and improve stands with overabundance of vines, overstocking, and undesired species. Proposed project elements include the following:

* Forest management on a total of 2,711 acres, including the following treatments:

* Clearcutting with reserves

* Commercial thinning

* Uneven-aged harvest

* Midstory removal

* Oak shelterwood

* Prescribed burning on 3-5 year rotations

* Shelterwood with reserves

* Stand improvement

* Woodland management

* Roads and fire lines

* Reconstruction of 6.27 miles of roads on non-system corridors with existing road prisms to add to the NF road system

* Removal of 4.15 miles of roads from the NF road system, 1.8 miles of which will be

* added to the trail system

* Daylighting 27.4 miles of road

* Construction of 1.9 miles of fire control lines

* Aquatic system treatments

* Ten aquatic organism passage (AOP) improvements on existing crossings.

Inadequate, failing, or impassable culverts will be replaced with passable structures.

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* One bridge will be improved and one culvert repaired.

* Wildlife openings

- * Rehabilitation of existing wildlife openings
- * Creation of new wildlife openings
- * Other botanical treatments
- * Control of non-native invasive plant species across the analysis area
- * Create openings in areas of expanded rhododendron on Right Hand Prong
- * Release and plant red spruce
- * High elevation Southern Appalachian bald restoration to release red spruce and yellow birch

There is one NC Natural Heritage Program (NCNHP) natural area in the treatment area - Richland Balsam/Beartrail Ridge (rated Exceptional). In addition, there are numerous records of rare and listed species, including Cerulean Warbler (*Setophaga cerulea*, NC Special Concern), Yellow-bellied Sapsucker [*Sphyrapicus varius*, NC Significantly Rare (SR)], Southern Water Shrew (*Sorex palustris punctulatus*, NC SR), Bigleaf Grass of Parnassus (*Parnassia grandifolia*, NC Threatened), Roan Sedge (*Carex roanensis*, NC SR), Sweet Pinesap (*Monotropsis odorata*, NC SR), White Mandarin (*Streptopus ampliexfolius* var. *amplexifolius*, NC SR), and American Fly-honeysuckle (*Lonicera canadensis*, NC SR).

We offer the following recommendations and comments:

- * Brook Trout. We appreciate the USFS' focus on Brook Trout restoration in the project area. Recently, the USFS and NCWRC worked together to restore Brook Trout into Boomer Inn Branch and Queen Creek. As controlled burns are slated for the area containing Boomer Inn Branch, we ask the USFS to ensure that burns will be of a low enough intensity to retain functional riparian areas. We ask the USFS to coordinate with NCWRC fisheries biologists on AOP projects.
- * Carolina Northern Flying Squirrel (CNFS). In 2022, NCWRC and USFS biologists performed acoustic surveys for CNFS. There were numerous detections within the project area, including one in an area slated for prescribed burns north of Boomer Inn Branch. This detection is in hardwood forest with scattered spruce, downslope of a higher quality spruce patch that is at risk of wildfire. We recommend that the USFS and NCWRC work together to develop a strategy to protect the CNFS within this area when planning prescribed burns.
- * Roan Sedge. Our understanding is that adjacent disturbance can be detrimental to this species. Are buffers proposed for locations of this species? We recommend that road decommissioning be done in a way that avoids impacts to this species.
- * Access for project activities through NCWRC game land
- * Queen Creek - it appears that the USFS intends to use an old road along Queen Creek on NCWRC game land. Portions of the road run through NCNHP Primary Dedication. Although NCWRC can maintain and improve old roads within the prism, we will need to initiate consultation with NCNHP. Please coordinate with NCWRC if access is intended through this area.
- * Poison Cove - if the USFS intends to access this area through NCWRC game land, the current road may not be sufficient, depending on equipment used.
- * Forest treatments
- * NCWRC appreciates the work that USFS has done to design harvests that progress in disturbance. For example, surrounding regeneration with shelterwood and adjacent treatments of varied levels of disturbance is an excellent way to mimic natural or historical disturbance.
- * What is the "other action" at Double Springs Gap? We recommend returning and maintaining this area in its historical open condition while maintaining and enhancing surrounding habitat for Carolina Northern Flying

Squirrel (CNFS).

* Wildlife openings

* We appreciate the intention to rehabilitate existing and create new wildlife openings. Silvicultural treatments around the fields will hopefully provide a more natural transition and beneficial edge effects.

* We recommend that the USFS consider wildlife opening creation in White Pine plantations (e.g., Poison Cove), as guided by the Forest Plan.

Thank you for the opportunity to review and comment on this project. We greatly appreciate the USFS' efforts to improve wildlife habitats in the district. Please feel free to contact me at (828) 400-4223 if you have any questions about these comments.