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March 22, 2022

National Forests in North Carolina
ATTN: Objection Coordinator
160 Zillicoa St., Suite A
Asheville, NC 28801.

Re: Nantahala and Pisgah National Forests Plan Revision Objection
To Whom it May Concern:

The North Carolina Forestry Association (NCFA) appreciates the opportunity to raise our objections to the Nantahala and Pisgah National Forests (Forest) Plan Revision and the Final Environmental Impact Statement (FEIS).

NCFA is a private, nonprofit partnership with over 4,000 forest managers, landowners, mill operators, loggers, furniture manufacturers, educators, and others interested parties concerned about the long-term health and productivity of North Carolina's Forest resources and the industries they support.

Projected Wood Sale Quantity and Projected Timber Sale Quantity
1.Issue: Projected Wood Sale Quantity and Projected Timber Sale Quantity all decreased substantially between all Draft Alternatives and Alternative E in the Revised Forest Plan. In addition to increasing the amount of noncommercial treatments to attain open forest conditions, the Plan also assumes that more mesic forests will be managed with uneven-aged management instead of even-aged management. The Project-level prescription decisions should not be assumed at the Plan-level to apply limitations to treatment types or constrain timber sale volumes. Even-aged treatments need to be one of the tools in the toolbox across ecozones, and are essential for providing high-quality young forest habitat in mesic forests that many wildlife utilize, including ruffed grouse.

a.Requested relief:
i.The Plan should increase Projected Wood Sale Quantity and Projected Timber Sale Quantity to be consistent with Draft Alternative, if not higher. The Plan should not assume that more mesic forests will be managed through uneven-aged treatments instead of even-aged treatments and the Plan should not constrain treatments in mesic forests. Even-aged treatments can be appropriate to help achieve desired conditions across all ecozones.
ii.Commercial timber harvesting is the most cost-effective means to create young and open forest desired conditions. Therefore, commercial timber harvesting should be included as the primary means to create young

and open forest conditions.

Consistency with NCFA comments: In our 2020 comments, the NCFA encouraged the Forest Service to treat as many appropriate acres as practical, especially as designation of timber suitability or for other compatible uses does not guarantee eventual treatment. Treating more acres for restoration purposes or wildlife habitat also increases the level of raw forest products that will be provided. The National Forests in western North Carolina are very important for providing the raw materials that wood processing facilities need to maintain their operations. The forest products provided by the Forest Service management are crucial to the health of our membership and their communities. Without the raw material sold by the Forest Service, these facilities would be unable to produce the amount of wood products that the citizens of this country demand.

Old Growth Network
2.Issue: The NCFA is concerned with the current inventory of old growth (OG) on the Forest. A recurring theme in appeals on FS projects is the claim that portions of the sale are currently OG. The FS needs to provide clearer guidance around existing OG and the development of the Old Growth network to reach desired conditions related to NRV. This would include more clearly defining OG that qualifies for addition to the network and a mechanism for doing so that helps reduce project appeals.

a.Requested relief: We recommend the USFS decrease their old growth network to 255k at the Plan-level, so we don't exceed the Desired Conditions established in the NRV model. To achieve this, the Forest Service should include known old-growth and remove areas that don't qualify as high-quality old-growth from the existing old-growth base network; or adopt a cap-and-trade system for dealing with old-growth on the Project-level without exceeding 255k acres total.

b.Consistency with NCFA comments: In our 2020 comments, the NCFA recommended that old Growth areas should be considered in the context of achieving Desired Conditions, as guided by NRV, across all ecozones. The NCFA supports the most efficient and cost-effective method for achieving Desired Conditions for Old Growth, while at the same time using adaptive management techniques, scientific approaches, and collaboration to ensure that site specific recommendations support broader landscape scale objectives regarding Old Growth Forests as contributing valuable ecosystem services. Many of our Forest Products Industry stakeholders adhere to rigorous Forest Certification Standards (FSC and SFI) that require special consideration for Old Growth Forests on the landscape. We request that the Draft Plan carefully use language in Standards and Guidelines that allows restoration in these special sites while also adhering to Forest Certification standards and protecting their inherent values on the landscape.

Best Management Practices
3.Issue: The NCFA is concerned that standard WTR-DC-06 located at page 42 of the Final Plan is overly restrictive and such guidance should not be applied landscape-level.
a.Requested relief: Remove ephemeral stream channels from any Desired Conditions, Objectives, Standards, or Guidelines in the Forest Plan. This includes WTR-DC-O6 located at page 42 of the Final Plan.

b.Consistency with NCFA comments: In our 2020 comments, the NCFA supported the legislatively defined forest practice guidelines and performance standards for water quality (now part of the Sedimentation Pollution Control Act). These practices represent sound, cost-effective ways of protecting water quality while allowing the continued management and harvest of forest products.

Open Woodland Acres

4.Issue: The Plan's Integrated Ecosystem and Wildlife Habitat Objectives for thin and burn treatments to attain open forest woodland conditions have been heavily reduced from previous draft alternatives.. In fact, the

Spectrum model in the FEIS predicts that only 85,635 acres (Tier 1) to 187,450 acres (Tier 2) will be restored and maintained as open forest woodlands over 200 years, whereas Desired Conditions based on the NRV model are to maintain 360,000 acres to 480,000 acres long-term based on the NRV model (USDA Forest Service, 2022, p. 3-128 to 3-129). Therefore, Desired Conditions for open forest woodland conditions will never be attained. At the same time, the Revised Forest Plan assumes that more "thin and burn" treatments will be applied noncommercially than through commercial timber harvesting, apparently because of poor site quality and remote locations (USDA Forest Service, 2022, p. 3-543). Furthermore, from public commentary presented by the US Forest Service, this non-commercial approach appears to be based on an incorrect assumption that regional partners, with access to small diameter harvesting equipment and established pulpwood markets, are not functional enough to meet higher levels of treated acres. This is a missed opportunity for low-grade forest product markets to support a cost-effective efficient means to achieve desired conditions. As presented in NCFA Comments on the Draft EIS, there is an extremely robust local market for small diameter wood that supports the pulp and paper industry, and regional biomass power boilers, consuming well over 2 million tons of small diameter wood fiber annually. This local market demand for small diameter wood, has been well established for over 116 years and is projected to remain well beyond the life of this current forest planning cycle. When these small diameter wood markets cannot rely on adequate local supply of wood fiber, they are forced to extend their procurement reach, thereby consuming more fossil fuel and resources than would otherwise be necessary if there was a dependable, functional, and predictable supply of projects focused on Open Forest Woodland creation on the Nantahala and Pisgah National Forests.

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a.Requested relief:

i.The Plan should significantly increase the Objectives for thin and burn treatment to attain open forest woodland conditions at levels that attempt to reach Desired Conditions based on NRV.

ii.The Plan should increase the amount of thin and burn treatments that can be completed with commercial timber harvesting.

iii.The Plan should support an increase in commercial wood utilization from existing forest product markets (pulpwood) and emerging forest product markets (woody biomass) for small-diameter, low-grade wood products.

iv.The Plan should make it clear that the USFS will work with partners to attain higher levels of open forest conditions through commercial and noncommercial treatments by engaging in Stewardship Agreements and other partner agreements (CCSA or PA).

v.The Plan should leverage the Tiered Objectives approach to set Tier 1 targets of open forest woodland creation that are achievable and based on expected budget conditions, while setting Tier 2 levels that more effectively approach Desired Conditions by fully engaging regional partner resources and robust market demand for small diameter wood.

b.Consistency with NCFA Comments: In our 2020 comment the NCFA supported the upper Tier 2 Objectives proposed for both thinnings and regeneration harvest to restore open woodland and create young forest conditions.

The NCFA looks forward to working with the US Forest Service throughout the implementation of the Final Plan. Please do not hesitate to contact me should any questions arise.

Sincerely,

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Executive Director

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