



SOUTHERN GROUP OF STATE FORESTERS

January 5, 2015

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Ms. Kristen Bail
Forest Supervisor, National Forests in North Carolina
USDA Forest Service
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Asheville, NC 28801-1082

Re: Comments on Draft Management Areas for Pisgah and Nantahala Forest
Plan Revision

Dear Ms. Bail,

The Southern Group of State Foresters (SGSF) appreciates the opportunity to offer these comments on the development of the Forest Plan for the Pisgah and Nantahala National Forests. SGSF represents the interests of the State Foresters from across a 13-State area of the southern United States, including the North Carolina Forest Service (NCFS). The SGSF mission is to provide leadership in sustaining the economic, environmental, and social benefits of the South's forests, both public and private, and thus we recognize the importance of the forest plan revision process to incorporate the full suite of forest values desired by the public.

We first would like to echo our support for the comments submitted by the NCFS on plan revision, the most recent of which we have included as an attachment to this letter. As one of our member organizations, the NCFS comments include the on-the-ground expertise relative to the landscapes in question, as well the knowledge of private forest landowner desires and forest products markets in the region to complement our more broad recommendations. In addition to supporting NCFS specific comments, SGSF would also like to take this opportunity to comment more broadly on forest management trends across the South and how they relate to this forest planning process.

In light of the Forest Service's Congressional mandate to manage the National Forest System for multiple uses, SGSF believes that a forest-wide planning document should inherently recognize and manage for the full suite of benefits desired by the public. Our National Forests are valued for



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many things, from wildlife habitat to local job creation, and from recreation opportunities to abundant clean water. All of these aspects of forest management and many more can and should be captured in the forest planning process. We feel this diversity of management opportunities is well represented by the 16 Management Areas in the proposed Forest Plan.

In particular, we offer our support for one item from the proposed plan which has generated public controversy, which is the designation of Management Areas 1 and 2a as suitable for timber production. Across the South the pace of active management on National Forest System lands has declined over the course of the past 30 years. This decline can be attributed to many factors from decreases in funding to an abundance of appeals and litigation on timber projects, but it should not be amplified by removing more acreage from even the potential of active management through the forest planning process.

The decline of active forest management on NFS lands has had a variety of detrimental impacts on forests and private forestland owners in the South. Fewer harvests, especially reduced small diameter thinning, as well as a reduction in prescribed burning has made the southern national forests more prone to wildland fire and more susceptible to devastating insect infestations. This has in turn elevated those risks on adjacent State and private lands, as these threats do not recognize ownership boundaries. The reduction in management has also led to a decline in quality wildlife habitat, as the USFS has appropriately recognized in this planning process. Our southern national forests no longer have the diversity of age classes and densities that adequately support healthy populations of wildlife species. Finally, a reduction in NFS active management across the South has played a major role in job losses, mill closures, and decline in economic prosperity in our rural communities. The level of active management needs to increase for all these and other reasons, and the forest planning process is a crucial place to start.

The forest planning process is essentially about setting up a broad framework for designation of what activities would be appropriate on a given landscape, under which subsequent project development can occur. Active forest management for the benefit of forest health, wildlife habitat, water quality, fire risk reduction, and job creation is clearly appropriate on a substantial portion of the National Forest System, and the Pisgah and Nantahala National Forests are no different. We applaud the USFS for recognizing and designating those acres in which treatment would not only be appropriate but beneficial, and urge the USFS to keep these management designations in the proposed plan going forward.



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Thank you for the opportunity to weigh in on Forest Plan revision. We would once again like to emphasize our support for the comments the NCFS has submitted throughout your process, which provide the necessary specificity to our broadly stated interests in this letter.

Sincerely,

George Geissler
State Forester, Oklahoma
Chair, Southern Group of State Foresters

Enclosure



North Carolina Department of Agriculture
and Consumer Services
N.C. Forest Service



Steven W. Troxler
Commissioner

Scott Bisette
Assistant Commissioner

December 30, 2014

Ms. Kristen Bail, Forest Supervisor
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Subject: North Carolina Forest Service comments during the “Proposed Plan and Alternatives Phase” of revisions to the Nantahala and Pisgah National Forest Plan

Dear Supervisor Bail:

I appreciate the opportunity for the North Carolina Forest Service to again provide comments during this current phase of the Nantahala and Pisgah National Forest Plan revision process. My intention here is to re-emphasize a few key points from the comments I submitted April 28, 2014.

Timber Sales, Allowable Cut, Areas Designated as Suitable/Not-Suitable for Timber Production

- To the extent possible and allowable, we advocate for an increase in the annual allowable cut with no net reduction in the acreage of land designated as suitable for timber production. This will help promote stability in the Western NC wood products sector and provide much needed jobs, taxes and economic stability within the region. Three counties in particular (Clay, Graham, and Swain) are classified as “Tier 1 counties” by the North Carolina Department of Commerce and, as such, are considered among the most economically distressed in our state. Increased timber harvesting in our national forests would generate a much-needed economic stimulus for a traditionally underserved region of North Carolina. Additionally, the Nantahala and Pisgah hold a large share of high grade oak sawtimber that is in short supply on private lands in Western North Carolina, while being in high demand in the marketplace. More of this timber should be made available than is currently occurring.
- Your assessments, as well as USFS FIA data, the NC Wildlife Action Plan and many others have documented the limited extent of early successional forests in Western NC, a condition that is even more prevalent on the National Forests. This planning process presents an opportunity to move toward a more balanced age-class distribution as an important desired condition on the forests as a whole.
- Within areas managed for timber production, clearcutting and even-aged management should remain a viable silvicultural option for increasing early successional forest habitats and this should not be arbitrarily limited or constrained.

Wilderness Designation

- When evaluating new areas for wilderness designation, include an evaluation of the economic impact of such designation on the local and regional economy.

- We generally favor no new wilderness designations due to the long-term restrictions on management that will result. We are concerned that designation of additional wilderness areas will place more public and private acreage at high risk for larger and more catastrophic wildfires, and insect, disease and invasive species outbreaks, further diminishing the health of forest ecosystems.

Ecosystem Restoration and Management

- I would like to reaffirm our interest and commitment to supporting and promoting the use of prescribed fire as an ecosystem restoration and management tool on both private and public lands, including the national forests.
- In recent years, we have increased our emphasis on restoration and management of shortleaf pine ecosystems. We see opportunities on both the Nantahala and Pisgah for the USFS to place a special emphasis on shortleaf pine management and restoration, as well as opportunities for our two agencies to collaborate in the years ahead.

I applaud you and your staff for all the work that has gone into the plan revision process thus far. Please be assured that the North Carolina Department of Agriculture and Consumer Services and the NC Forest Service stand committed to continuing our long tradition of partnering together with the USFS to ensure that all of North Carolina’s 18.6 million acres of forestlands are protected and managed for the benefit of all citizens. Please don’t hesitate to call on me should you wish to discuss our comments in greater detail. We thank you for the opportunity to share our interests and suggestions.

With warmest regards,



Scott Bisette