



Monday, October 1, 2012

Mr. Michael Wilkins
District Ranger
Nantahala Ranger District
90 Sloan Road
Franklin, NC 28734

Dear Ranger Wilkins,

This letter represents the Friends of Panthertown Board of Trustees' response to the request for comments (File Code: 1950) on the addition of eight units in Macon, Jackson, and Swain Counties to the prescribed burn rotation, beginning in the year 2013, and specifically the inclusion of item 3, Blackrock Unit and item 4, Little Green Unit. We thank you on behalf of our membership and the Board for extending our comment deadline to October 6, allowing the Friends of Panthertown to hold a public forum, solicit input from our members, and complete our research on this multifaceted and complex topic.

After significant deliberation, research, the public forum, review of comments from the Friends of Panthertown website, and review of the issues with related nonprofit organizations, it is the consensus of the Board that we respectfully request that you do not burn in either the Little Green or Blackrock units in Panthertown Valley at this time. If, after reviewing the comments from the public regarding this issue and further studying the ecological impact, the Forest Service determines that it wishes to use prescribed burning as a forest management tool in Panthertown Valley, then we respectfully request that you consider alternative locations to Little Green and Blackrock, such as Big Green or other areas that receive less recreational use.

In order to minimize negative public perception of the burn, we would also request that the impact of an initial burn be reviewed over a period of not less than 4 years prior to completing the planned burns. Recognizing that alternative locations may not have the existing low-cost fire breaks found in the proposed units, Friends of Panthertown is willing to create any needed fire breaks in alternative areas under the direction of the Forest Service as part of our volunteer work plan. Friends of Panthertown is also willing to create fire breaks that would enable the Forest Service to not extend its proposed burns up to existing popular trails and overlooks, an approach that we believe would reduce potential negative reaction to the Forest Service burn program.

The Board is aware that there are sentiments and science both in favor of, and opposed to, the use of prescribed burning as a forest management tool. However, the Board is convinced that reasons cited in the current scoping proposal for the Panthertown Valley units are not compelling enough for the Board to support the proposal in its current form and that the current proposal is not in the best interest of Panthertown Valley. We understand the Forest Service's reasons for using prescribed burns, but the

Little Green and Blackrock units identified in the scoping proposal represent large parts of two of four high-use recreational corridors in Panthertown Valley: Blackrock Spur Trail, Blackrock Mountain Trail, Little Green Trail, and the Panthertown Valley Trail. The Board believes that the Forest Service should avoid prescribed burns in these high-use recreational corridors and should focus its burn program on areas in which the program is less likely to generate public criticism and controversy.

We believe the majority of our Friends of Panthertown members and other users of Panthertown Valley are against prescribed burning and are in fact interested in seeing many of the plant species that the Forest Service would be targeting for the prescribed burns, such as the mountain laurel blooms in the spring and the vibrant color of the maples in the fall. We have seen a substantial increase in the use of Panthertown Valley, particularly in the last five years, and the economic benefit this brings to the Cashiers area is significant. Burning in high-activity areas could negatively impact the user experience and decrease interest in Panthertown Valley for some period after the prescribed burn.

The Friends of Panthertown Board is also concerned with the impact of a prescribed burn on specific plant species such as the pink shell azalea, twisted-hair spike moss, blueberry, bear huckleberry, sand myrtle, and the purple and Carolina rhododendron, some of which are endangered or rare. We believe the concern regarding our special and endangered plant species is shared by other conservation organizations such as The Wilderness Society and the Western North Carolina Alliance and will be reflected in their official comments on this proposal. Panthertown Valley is a designated NC State Natural Heritage Area and as such the Board believes that care needs to be taken to ensure that the rare and endangered plant species, as well as the special display of plants found in Panthertown Valley are protected.

Finally, the Board is concerned about the significant size of the proposed prescribed burn areas in Panthertown Valley. The current scoping proposal calls for a proposed burn of a total of 4,927 of the 250,000 acres in the Nantahala Forest District, or approximately 2 percent of the forest under management in this district. While the 6,295 acres in Panthertown Valley represent less than three percent of the Nantahala Forest District, the Blackrock and Little Green units targeted for prescribed burning total 814 acres or more than 16 percent of the total proposed burn area and almost 13 percent of the total acreage in Panthertown Valley. The increasing user activity in Panthertown Valley, combined with the large percentage of the Valley area included in the proposed burn and the acreage in Panthertown Valley that is designated for logging in the next couple of years (an action that we have supported), may result in significant public concern over a perceived substantial and disproportionate impact on the Valley. The same number of prescribed burn acres could be accomplished with less negative impact if the Forest Service would focus on more remote, less well-known, less unique, and less used publicly visited portions of the forest.

The Friends of Panthertown Board appreciates the partnership that we have with the Nantahala Ranger District and we want to be not a only a source of help for work on the ground in Panthertown Valley, but also a source of support for the actions of the Forest Service. The Board is willing to discuss our perspective in more detail at your convenience and hopes the constructive intent of our comments is apparent.

Respectfully,

Friends of Panthertown Board of Trustees

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