



Sept 17, 2012

USDA Forest Service
Nantahala Ranger District
90 Sloan Road
Franklin NC 28734
comments-southern-north-carolina-nantahala-nantahala@fs.fed.us
Re: Nantahala Ranger District – Future Prescribed Burns

Dear Mike and Greg:

Please accept these comments regarding scoping of proposed Nantahala Ranger District – Future Prescribed Burns on behalf of the Wilderness Society. The Wilderness Society has a strong interest and involvement in land management planning for areas of Nantahala National Forest.

The Wilderness Society supports prescribed fire when the goals as well as the purpose and need clearly relate to ecological restoration. Plans for Rx burn projects should also demonstrate that the proposed actions will accomplish restoration goals. It is also important to balance the anticipated restoration benefits of fire with impacts to important natural features. The scoping document does not make a persuasive case for at least 3 of the proposed burn units: Little Green Mountain, Blackrock Mountain, and Fire Gap, and we are concerned that important biological considerations have not yet been taken into account.

These proposed burn units correspond to NC State Natural Heritage areas. While some of the element occurrences and rare species habitat within these areas could be fire related, others are clearly not fire related and likely would be harmed by fire. It is not clear that the prescribed fires being proposed would be designed in a way and with the goal in mind of conserving these rare element occurrences. In fact the discussion within the scoping indicates

that these types of considerations have not been taken into account. The existence of these important biological areas are not documented or acknowledged to the public, the purpose and need statements fail to refer the rare element occurrences, and the design of the burn units does not appear to take these natural areas or the rare element occurrences into account. Proper consideration of the natural heritage areas would acknowledge the areas and set up a scenario for future NEPA analysis balancing benefits of prescribed burns with potential impacts of burns on the rare element occurrences. Impacts to some element occurrences could be beneficial as well as harmful, but this framework for evaluation has not been acknowledged or elaborated on in the scoping even though some aspects of species habitat are used as a rationale for the burn units. For example, restoration of Table Mountain Pine is given as a reason for establishing the Little Green Mountain and Blackrock Mountain burn units. It is a glaring omission that the granitic dome communities, *Rhododendron vaseyi*, and other rare species within Little Green Mountain and Blackrock Mountain are not disclosed as a prelude to NEPA analysis addressing effects of various fire regimes. It is also not clear that table mountain pine, occurring in shallow pockets on the rock outcrops would necessarily benefit from a fire regime. Similarly, the occurrence of rare salamander species, bogs, bog turtles, and rich cove forest within the Fire Gap unit are important considerations that should be established in the scoping.


While there are some elements within these burn units that could benefit from the establishment of some type of fire regime, it is clear that this would be a razor's edge situation where other species and rare communities could be negatively impacted. And even the supposed benefits would be highly dependent on the design, return interval, and implementation of prescribed fire. The scoping should begin this discussion and establish a basis for further analysis within NEPA. By neglecting important restoration considerations and rare species/communities the scoping does not establish an adequate framework for further analysis. These additional issues must be thoroughly addressed.

The absence of basic information and a framework for future evaluation is most notable in the case of the three units highlighted above overlapping Significant State Natural

Heritage areas. However, it is likely that there are similar situations within other burn units that require further evaluation.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Hugh Irwin". The signature is written in dark ink on a light-colored background.

Hugh Irwin,
Landscape Conservation Planner
The Wilderness Society
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Black Mountain, NC 28711

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