March 14, 2016

Allen Nicholas  
Forest Supervisor, National Forests in North Carolina  
160 Zillicoa Street, Suite A  
Asheville, NC 28801

Re: Nantahala and Pisgah National Forests Land and Resource Management Plan Revision

Dear Mr. Nicholas,

As Co-Chairs of the bipartisan and bicameral North Carolina Legislative Sportsmen’s Caucus (Caucus), we represent a group of state legislators dedicated to protecting and advancing the rich outdoor traditions of hunting, angling, recreational shooting and trapping in the Old North State. Since its inception in 2006, the Caucus has consistently worked to protect and promote North Carolina’s sporting heritage by supporting pro-sportsmen’s legislation and state fish and wildlife management objectives.

Welcome to our state in your role as the new Forest Supervisor for the National Forests in North Carolina. We have followed the Nantahala and Pisgah National Forests (NPNF) Land and Resource Management Plan revision since 2012, and the number one issue of public concern on the NPNF is the lack of quality wildlife habitat, specifically young regenerating forests and early successional habitats. In anticipation of the release of the Draft Environmental Impact Statement this year, we want to reiterate our support for drafting a forest plan that includes broad flexibility for active habitat management.

Designations and management areas that prohibit, or in effect restrict, forest management activities are detrimental to wildlife and forest health. A high percentage of the NPNF is permanently off-limits to active management because of Congressional designations, and it is essential that the new forest plan leaves as much acreage as possible open to active habitat management.

Managed cooperatively with the North Carolina Wildlife Resources Commission (NCWRC), the NPNF comprise over half of North Carolina’s public hunting land. The NPNF Game Lands have a
rich hunting heritage, but those traditions are in jeopardy due to the paucity of quality wildlife habitat, primarily due to policy decisions that have failed to create young forests and other early successional habitats. Quality habitat is the basis for healthy wildlife populations, and hunter experience is positively correlated to wildlife populations.

The sharp decrease in NPNF timber harvesting after the 1987 forest plan was significantly amended in 1994, combined with the annual failure to harvest even close to the allowable sales quantity, has contributed to population declines of popular game species, most notably white-tailed deer and ruffed grouse. The most recent North Carolina Avid Grouse Hunter Survey report, which has been conducted annually by the NCWRC since 1984, concluded that, “grouse hunting during the 2014-15 season was the poorest on record.” Similarly, deer harvest rates have decreased significantly and interest in hunting on the NPNF has waned with many local sportsmen and women now traveling outside of their home region to hunt. We believe this would not be the case if the habitat was managed properly. The average 860 acres harvested annually from 2002 to 2014 is less than 0.09% of the NPNF. It is unconscionable that over 1 million acres of public land cannot be managed to provide ample quality hunting experiences for North Carolina’s sportsmen.

The importance of sportsmen’s contributions to our state’s economy and conservation funding cannot be understated. North Carolina’s 1.63 million sportsmen and women spent $2.3 billion hunting and fishing and supported over 35,000 jobs in 2011 according to the U.S. Fish and Wildlife Service’s National Survey of Fishing, Hunting and Wildlife Associated Recreation. In addition, the revenue generated from license sales and excise taxes on sporting-related goods, a “user pays – public benefits” structure known as the American System of Conservation Funding, provides a crucial source of annual funding for the NCWRC. The Caucus hopes the NPNF Interdisciplinary Team will give these contributions due weight in light of the final directives for the 2012 Planning Rule which require an assessment of the plan’s influence on economic conditions in the area of influence and broader landscape.

The NCWRC and other hunting conservation organizations recommend that at least 10 percent of the NPNF be in early seral size classes, yet, according the NPNF 2014 Assessment Report, young forests comprise less than two percent of the NPNF. We recommend a significant increase in the annual acreage harvested to create more regenerating forests for disturbance-dependent wildlife and other species that benefit from a diverse forest. The lack of quality wildlife habitat on the NPNF is the major limiting factor for healthy wildlife populations, and the Caucus strongly supports improving wildlife habitat through the use of even-aged timber harvests, thinning, timber stand improvements, prescribed fire, American chestnut plantings and the creation and maintenance of grass-forb wildlife openings.

Implementation of these wildlife habitat improvements will require a forest plan that is conducive to active habitat management. We therefore encourage you to retain all management options outside of Congressionally mandated areas. Specifically, we strongly urge you to:

1. Maximize acreage for active management and forest restoration (i.e. draft MAs 1 and 2);
2. Create no new plan-level designations that restrict management (e.g. Special Interest Areas, Scenic Areas, Research Natural Areas, Recreation Areas, Cultural Heritage Trails, Special Biological Areas, or Scenic Trails); and

3. Recommend no Wilderness, Wilderness Study Area, National Recreation Area, National Scenic Area, Wild and Scenic River or other designation that needs Congressional approval.

A forest plan that is pro-management friendly is in the best interest of wildlife and forest health.

We also ask that you give strong consideration to the recommendations of the NCWRC.

The NPNF is an invaluable resource for North Carolina’s sportsmen. To ensure future generations of Tar Heel hunters can enjoy quality hunting experiences with family and friends in the NPNF, we again state our strong support for maximizing management flexibility in the new Nantahala and Pisgah National Forests Land and Resource Management Plan.

Sincerely,

North Carolina Legislative Sportsmen’s Caucus
House Chair – Representative John R. Bell, IV
Senate Chair – Senator Buck Newton

cc: Gordon Myers, Executive Director WRC
    Honorable Governor Pat McCrory
    Honorable Senator Richard Burr
    Honorable Senator Thom Tillis
    Honorable Representative Mark Meadows
    Honorable Representative Virginia Foxx
    Commissioners, WRC