



August 26, 2026

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

Dear Mr. Melonas:

Blue Ridge Audubon Chapter's mission is to protect birds and the places they depend on, in the belief that a landscape where birds thrive benefits all living things. That mission brings us to write as your team determines the path forward for the Nantahala and Pisgah National Forests following the court's March 31, 2026, decision concerning the 2023 Land Management Plan, while the recovery from Hurricane Helene remains underway.

We recognize the extraordinary complexity of managing more than one million acres for ecological integrity, water quality, recreation, community safety, forest products, and wildlife. We hope to contribute our perspective about birds and their habitats while also offering our help where it may be useful.

The Forest Service has already invested considerable time and expertise in studying these forests and documenting the importance of maintaining a variety of habitat conditions. We respect that work and do not intend to repeat it here.

We nevertheless respectfully ask the Forest Service to evaluate the habitat Helene has already created before deciding how much additional young forest to produce through timber harvest. At the same time, we ask that particular weight be given to protecting mature and old-growth forest, large trees, intact forest interiors, riparian corridors, and connections among them, the conditions that take the longest to restore once lost.

This is not an argument against active management. It is an appeal to account fully for the changes already produced by the storm, match future treatments to demonstrated ecological needs, and protect the forest conditions that are hardest to replace.

The value of these older forests is not always visible from the roadside. When soundscape ecologist Bernie Krause recorded Lincoln Meadow in the Sierra Nevada before and after a "selective" harvest promised to have little impact, the site looked all but unchanged to the eye, yet his recordings revealed a dawn chorus that had thinned sharply and, decades later, had not recovered. What appeared intact had fallen quiet. Though that forest is of a different type than our own, the lesson applies here: it is precisely this kind of loss-

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structural, gradual, and easy to overlook- that we hope the next round of analysis will weigh with care.

Building on the Forest Service's existing planning and monitoring commitments, we ask the agency to consider the following:

1. Assess known and potential Golden-winged Warbler sites, including suitable canopy openings created by Helene above 2,500 feet. Pay particular attention to sites near historical occurrences and within priority management areas identified in the Forest Plan. These assessments should consider vegetation structure, the size and location of each opening, the surrounding landscape, proximity to existing populations, and whether suitable conditions can be maintained over time.
2. Monitor Golden-winged Warbler use of suitable sites before deciding where additional young-forest creation may be needed. We also ask that available results be shared annually with Blue Ridge Audubon and other interested partners.
3. Determine which early-successional areas created by Helene may require follow-up management to maintain or improve their value as Golden-winged Warbler habitat. Where such management is undertaken, establish measurable habitat and species objectives and monitor whether those objectives are being met.
4. Use the Appalachian Mountains Joint Venture's Cerulean Warbler management guidelines, particularly the recommendations on pages 18 through 22, when planning projects that include commercial timber harvest in known or potential Cerulean Warbler habitat. This should include projects located within priority management areas identified in the Forest Plan.
5. Retain the large trees and mature-forest structure that Cerulean Warblers depend on. In the Appalachian Mountains, preferred tree species include white oak, chestnut oak, bitternut hickory, cucumber magnolia, and sugar maple. Particular consideration should be given to retaining individuals of these species that are 16 inches or greater in diameter at breast height, as recommended by the applicable guidelines and supported by conditions at the site.
6. Where public safety allows, retain large hollow trees, large living and partially living trees, snags, broken-top trees, and fallen woody material. Chimney Swifts now nest or roost in trees only rarely, so we should not overstate the direct benefit to this species. Still, preserving suitable natural tree cavities maintains a habitat feature that has become exceptionally scarce and can also benefit other wildlife.
7. Set measurable objectives for projects intended to benefit the Golden-winged Warbler, Cerulean Warbler, or Chimney Swift. Monitor results and use what you learn to guide follow-up management before repeating or expanding similar treatments elsewhere.

Blue Ridge Audubon would welcome the opportunity to support this work in ways that reflect our chapter's actual strengths and capacity. We can:

- Participate in public planning and comment opportunities and help our members provide informed input.
- Help the public understand conservation, forest recovery, monitoring, and management decisions for the Golden-winged Warbler, Cerulean Warbler, and Chimney Swift through educational programs, speakers, bird outings, newsletters, and other outreach.

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- Explore whether chapter members could contribute eBird checklists or other observations from selected sites in coordination with the Forest Service's existing integrated monitoring efforts. Such participation could range from general bird lists to more focused surveys of selected sites, depending on need, the monitoring protocol, and available capacity.
- Explore possible coordination with Audubon North Carolina, other regional organizations focused on habitat management, and, when appropriate, UNC Asheville or other academic and research partners that may be able to provide additional scientific or technical expertise.

We offer these ideas in a spirit of partnership and with sincere respect for your staff's expertise and the many responsibilities your team must balance. We would value the opportunity to hear your perspective, learn where you see the greatest need, and discuss whether Blue Ridge Audubon could play a useful and manageable role.

Would you be available to meet with us in person at your office on any of the following dates and times?

- September 7, 2026
- September 17-18, 2026
- September 21-25, 2026
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If none of these options work for you, we would be happy to find another time.

Sincerely,



John Koon
President, Board of Directors
Blue Ridge Audubon Chapter