



Audubon | NORTH CAROLINA

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Regional Forester
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Attn: Objection Coordinator
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Submitted electronically via CARA Online Portal:
<https://cara.ecosystem-management.org/Public/CommentInput?Project=43545>

Notice of Objection to the Final Land Management Plan
for the Nantahala and Pisgah National Forests

OBJECTOR CONTACT INFORMATION

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ELIGIBILITY TO OBJECT

Audubon North Carolina submitted substantive comments, both in our letter June 29, 2020 (attached here for reference) and as an affiliate of the Nantahala Pisgah Forest Partnership (NFPF) (original comments submitted June 25, 2020). Our involvement in the PNFP as well as the National Forest

Foundation Stakeholders Forum made apparent the need for plan components that would move us toward less contention and reduced conflict at the project level.

INTRODUCTION

Many of the ideas generated during those years of stakeholder work are reflected in the plan such as management areas defined as Interface, Matrix, and Backcountry depending on the level of active management appropriate for a variety of needs. In addition, Tiered goals that allow the Service to lift all interests as progress is made toward needs like young forest creation, invasive species control, road maintenance, trail building, and old growth designation while balancing all interests.

As we move toward implementation of the plan, it is imperative that future readers of that plan for its operational life are clear in the ways that plan components (desired conditions, standards, objectives, and guides) adhere to that lofty goal of working together to achieve higher levels of restoration, protection, and sustainable economic use of the forest.

Our shared comments with the NFPF address some of these basic concerns including tiered progress milestones (“trigger or thresholds”), recreation concerns, old growth alternatives, the value and protection of ecological interest areas, the use of a variety of priority treatments for restoration objectives that would reduce conflict at the project level and move the forest toward the sideboards of the natural range of variation.

In addition, we feel that some of the points made in our Audubon NC comments were also not adequately addressed and would like to reiterate a few of those regarding landscape level attainment of plan goals and the value of the forest in its regional context. We would also like to reiterate and emphasize some of our earlier comments regarding a robust monitoring plan, which we know will be forthcoming.

Objection 1 regarding Terrestrial Ecosystems (Forest Landscape Pattern and Connectivity and Wildlife Habitat)

In Audubon NC’s original comments (attached) we made the case for clearer evaluation of the regional context of the forest in terms of departure models, NRV, and structural characteristics of the forest at multiple scales. While we appreciate the revisions made to certain sections of the plan including ECO-DC-03, we still feel that the following Desired Conditions fall short in this regard. (Final Plan pp. 51) Recommended remedy language is included in bold type.

ECO-DC-01 Across the forest, patches and connectors of National Forest System land sustain a diversity of ecosystems and habitat types, providing ecological integrity and enhancing conditions for native species **for each ecological zone at multiple scales including within geographic areas and regionally.**

ECO-DC-04 Smaller patch sizes that are surrounded by private lands contribute to the forested or open lands pattern in western North Carolina **dependent upon the desired conditions and NRV context of the patch location within its landscape context.**

ECO-DC-05 Connectors, in the form of linear corridors of **closed canopy** forest, cross the landscape to facilitate species movement between patches.

(the following components are found in the Final Plan p. 65)

WLF-DC-01 Young forests with seedlings and saplings are distributed across all ecozones and elevations but especially in higher elevation montane oak ecosystems for species such as ruffed grouse, golden-winged warbler, white-tailed deer, and elk **as predicted by NRV at multiple spatial scales (stand, priority watershed, geographic area, and regionally).**

WLF-DC-03 Unfragmented interior forest conditions continue to occur across the landscape **as predicted by NRV at multiple spatial scales (stand, priority watershed, geographic area, and regionally).** The distribution may change as the forest ages or management actions occur.

Objection 2 regarding the Monitoring Plan

While we understand and look forward to the completion of the final monitoring guide we do want to be sure that plan components are inclusive of our desire for the regional context of the forest to be a critical and key component of that monitoring plan. The final plan monitoring plan makes tremendous progress over the draft plan in that regard, but we would to point out the following plan components that we feel need improvement. Again, remedy language is suggested in bold.

MQ 2-1-T1. What is the trend in young forest conditions? How much young forest is present by ecozone? What amount of young forest is above 2500' and within NCWRC Wildlife Habitat Active Management Areas? What disturbances contributed toward the trend in young forest?
Indicators: Acres, location and percent of young forest by ecozone **geographic area**, forestwide, and **regionally**. Amount of measurable young forest by disturbance type. *Note that this remedy might also include larger spatial scales as a new Tier 2 goal (MQ 2-1-T2)*

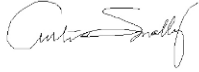
MQ 6-5-T2. What disturbances have occurred across the forests what proportion are natural disturbances?

Indicators: Number, type and degree of disturbances and proportion of that are natural disturbances
Evaluation of disturbances on: geophysical settings; ecozones **and other landscape scales**, species at risk, unique or special habitats, recreational uses

In conclusion we appreciate the work of the Forest Service staff to craft a plan that puts ecological process front and center of the plan and that works hard to balance the variety of needs placed on the forest. It is our hope that as we and other groups move forward to implementation, we can have a final plan that reduces the potential conflict among those competing desires and that ultimately creates a healthier, more resilient forest for all users and for the wildlife and natural communities that also call it

home. I look forward to discussing these objections and working with the service for an improved final plan. Thank you for the opportunity to be a part of this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Curtis Smalling". The signature is fluid and cursive, with the first name "Curtis" and last name "Smalling" clearly distinguishable.

Curtis Smalling
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