



July 17, 2024

To: Pisgah District Ranger Dave Casey

From: Josh Kelly

Re: Lickstone Project

Dear Dave,

In the two years between the Scoping of the Lickstone Project and the Draft Environmental Assessment, the proposed project has not changed much. Because of that, I ask that you and the interdisciplinary team review MountainTrue's scoping comments again as they remain relevant.

Contrary to the Lickstone Project, the new forest plan was finalized, and it has changed our perceptions of both the values of the US Forest Service and the implications of individual projects. Contrary to our hopes, the Forest Plan did not set priorities for restoration by ecozone (for example: it did not value restoration in more departed ecozones, like Pine-Oak Heath, over actions in less departed ecozones, like Northern Hardwood), the new plan placed over 100,000 acres of sensitive habitat for native plant and wildlife species in Management Areas that prioritize timber production, did not analyze the impacts of additions to the road system, and made dubious claims about the impacts of logging that were unsupported by the Environmental Impact Statement. Despite years of progress and much more pressing needs in other areas it is our perception that commercial timber management and meeting the local volume target remain the top priorities of the US Forest Service.

Silviculture

It is refreshing to see a project with so many different silvicultural prescriptions. In our decades of closely following National Forest timber sales, we have mostly seen the same prescription, the "two-age leave" (which might be better classified as a clearcut with reserves), proposed for the majority of timber harvests with very mixed results. In many ecozones, the scale of disturbance resulting from clearcuts with reserves are naturally rare, and these large gaps tend to promote dominance by just a few tree species because of a lack of fire and the fact that light and moisture environments are not diverse after harvest. We are encouraged that the Lickstone Project proposes at least four types of commercial

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harvest, as well as non-commercial harvest and prescribed fire. We believe that the project will produce better results because of the diversity of silvicultural prescriptions, especially when those silvicultural prescriptions are specified for the Ecozones and conditions on the ground. The project still has some room for improvement in that regard, but relative to historical trends, we see progress in the Lickstone Project.

Rich Cove and Mesic Oak Forests will be degraded by the Lickstone Project

The trend we have seen with recent projects on both Nantahala and Pisgah National Forests is for the Forest Service to market projects as restoration, but focus the majority of intense disturbance, i.e. commercial logging, into Rich Cove and Mesic Oak Forests. This trend continues in the Lickstone Project. As documented in the Forest Plan and in Lickstone Project Documents themselves, Rich Cove and Mesic Oak have some of the lowest natural probability for large openings. Indeed, researchers such as Lorimer, Runkle, and others have documented that openings larger than ¼ acre are rarely created by natural disturbances in Appalachian mesophytic forests. The practice of disproportionately targeting Cove Forests for timber harvest is not new. This is why the Cove Ecozones have the largest deficit of old-growth structure and why the departure analysis commissioned by the Fire Learning Network in 2013 found a higher proportion of young forest in the Rich Cove Ecozone than any other Ecozone. The historical and *current* over harvesting of the Rich Cove Ecozone on both public and private land is the largest driver of ecological departure for cove forests. Beyond just the structural imbalance caused by the overharvesting of mesic forest Ecozones, logging in these systems creates more opportunities for non-native invasive plants to establish, thrive, and displace native species. The Environmental Impact Statement for the new Forest Plan acknowledges that at least 16 species Non-Native Invasive Plants are especially problematic following logging in the Rich Cove Ecozone. Many of those species are present in the Lickstone Project Area. Remarkably, reducing the amount of logging disturbance in Rich Cove Forest is a stewardship strategy that Pisgah National Forest seems resistant to.

Despite the wealth of information about the ecology of Appalachian mesophytic forests and good information about ecozone characteristics being included in the forest plan, the Lickstone Project still proposes to create more young forest in the Rich Cove and Mesic Oak Forests than the Natural Range of Variation documented in the Forest Plan predicts. This is true not only for the 9,000 acres project area, but the entire 37,000 acre Geographic Area (EA p. 50). Extrapolating, this means that the Project Area will have 4x the amount of young forest in the Rich Cove and Mesic Oak Ecozones than is supported by the best available science. Meanwhile, all of the other ecozones are predicted to have a deficit of young forest. The reason for this is simple: Rich Cove and Mesic Oak ecozones are more economically viable to

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cut timber in than the other ecozones. This leads the US Forest Service to over harvest those ecozones while neglecting ecozones that would actually respond more positively to disturbance, such as all of the more fire-adapted ecozones.

Two particular cases in point are units 50 and 52. These two units are at the upper elevation limits of the Rich Cove Ecozone and are in a highly desired condition from a conservation standpoint. These stands have a very diverse canopy made up of basswood, cherry, buckeye, sugar maple, red oak, and formerly ash. Notably, they have very little poplar in the canopy. Likewise, the herbaceous layer is very diverse and includes Southern Appalachian endemic species like umbrella leaf as well as good populations of economically and culturally valuable herbs for food and medicine. They support diverse and abundant populations of neotropical migrant songbirds and regionally endemic salamanders. The herbaceous layer is high quality food for deer and is heavily browsed. Despite their good condition, these stands are proposed to have over 80% of the canopy removed and this action is being billed as restoration, even though any honest and knowledgeable observer of Southern Appalachian Forestry would predict that logging those stands would mean a loss of tree diversity in the canopy due to poplar dominance, a loss of cover of conservative herbaceous species in the understory due to the response of weedy species, and the introduction of non-native invasive plants like garlic mustard and Oriental bittersweet, both of which are present along the access roads needed to log these stands. I would be curious about the opinions of the interdisciplinary team when it comes to the proposal for those two units in particular. In my opinion any benefits accrued from 10 years of young forest habitat resulting from the harvest of those stands will be offset by creating two more poplar dominated stands where once there were more diverse conditions.

Cultural Resources

The Lickstone area is rich in cultural resources from both the prehistoric, early historic, and historic periods. Thorough, site specific surveys should be completed for cultural resources. Probabilistic models are insufficient and often inaccurate for identifying cultural sites and should not be used in place of field surveys.

Soil and Water Concerns

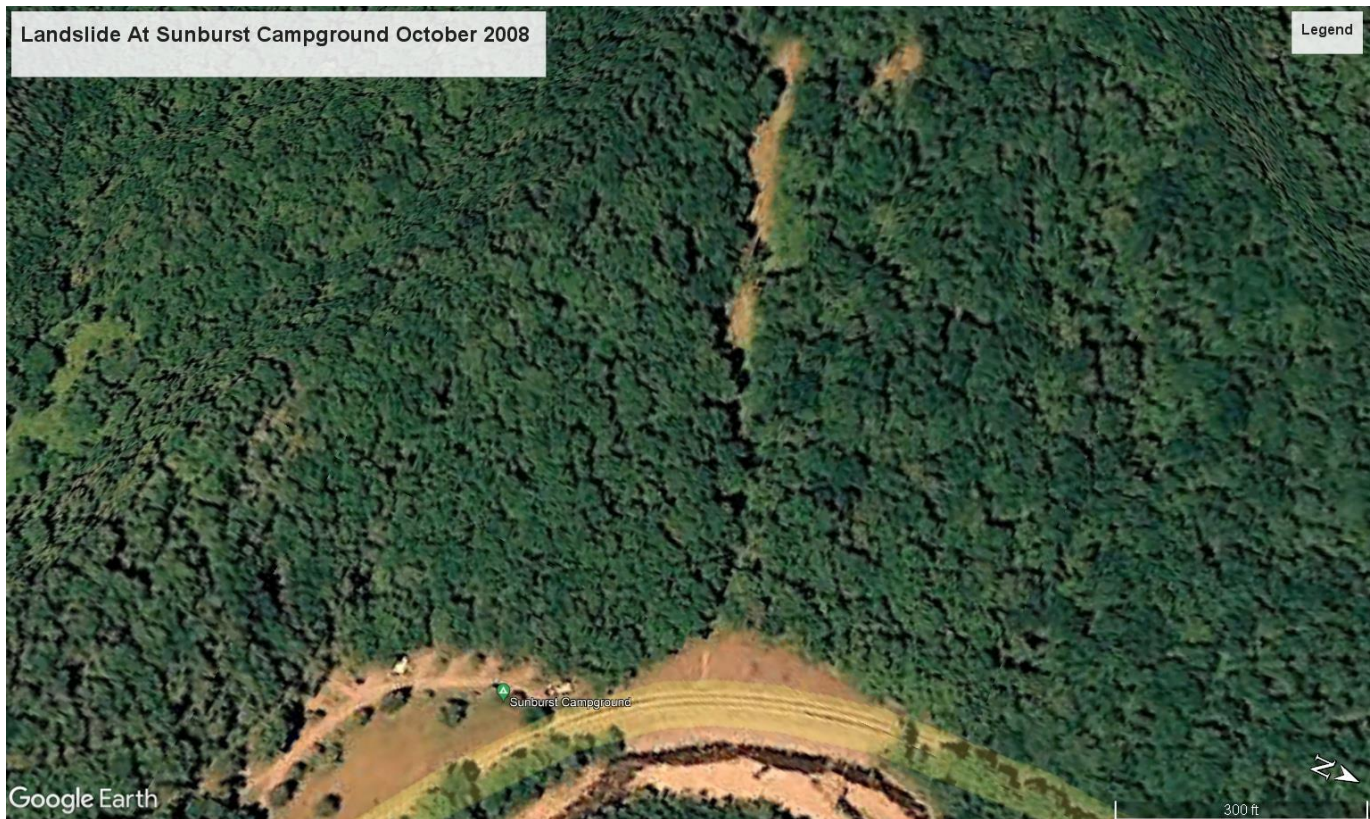
Lickstone Ridge is one of the highest elevation areas in the Eastern US, has an abundance of steep slopes and highly erosive soils, and receives copious rainfall. There is a distinct chance that road building and logging on steep slopes proposed in the project will trigger landslides. There have been landslides in the

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area as recently as 2008, as documented by Google Earth. Ground disturbing activities on steep slopes, combined with the increasing intensity of precipitation events, makes the project likely to cause significant erosion and possibly trigger landslides.



Impact to Backcountry Areas

While the new Forest Plan declined to designate any Backcountry outside of the IRA on Lickstone Ridge, its inclusion in the Potential Wilderness Inventory identifies Lickstone, by default, as one of the most remote locations in the region. We realize that the Forest Service has chosen the Matrix MA for all of the areas we are raising as concerns here, but the management area title bestowed by the Forest Service does not change the reality of the character of the area, nor will it cause people that value natural landscapes over human dominated ones to care less about the remote portions of Lickstone Ridge.

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It is especially concerning to us that roads are proposed for construction and addition to the road system in this remote context. 97U and 97W are both proposed additions to the road system that we oppose. Likewise, we do not believe the benefits of building these roads and logging the stands they access outweigh the impacts to the remote character of the area. Units 5, 9, 23, 52, and 57 all completely or partially overlap areas that had strong support from the largest possible consensus group as backcountry management. These areas are not only remote, but they are very steep, and present hazards to soil and water to harvest. The outcome of the Panther Branch and Bald Knob timber sales from nearby Courthouse Creek, both of which caused excessive sedimentation in the form of BMP failures and a landslide, should provide a cautionary example and weigh against pursuing road construction and harvest in these areas.

Controlled Burns

MountainTrue is generally supportive of the controlled burns in the Lickstone Project. In particular, the high elevation Pine-Oak Heath on Three Tree Ridge is quite unique. It is not predicted by the Ecozone model, which is a sign of both its uniqueness and the limitations of the model. The burns in the Lickstone Project are not particularly needed to prevent wildfire, as the area is generally high elevation, cool, and moist, but fire will be beneficial to pine and oak forest types and their associated plants and wildlife.

Spruce Restoration

MountainTrue supports the spruce restoration efforts that are part of the project. We believe that thinning around young spruce trees will speed their growth and improve habitat for Carolina Northern Flying Squirrel and other rare species in the long run.

Concluding Thoughts

Lickstone Ridge was a project that MountainTrue could have fully supported with a few relatively minor modifications. In its current state, and in the context of a Forest Plan that values agency discretion over setting consensus priorities, and values young forest associated species that range across most of the continent over endemic Southern Blue Ridge species, we cannot support the project in its current form. Given that there are no alternatives to the proposed action, it appears the US Forest Service is not interested in making modifications to the project or in considering a diversity of opinions on how to best steward Pisgah National Forest. I truly hope that perception is incorrect.

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Sincerely,

Josh Kelly
Resilient Forests Director
MountainTrue

Works Cited

Lorimer, Craig G. *Age Structure and Disturbance History of a Southern Appalachian Virgin Forest*.
Ecology, Vol. 61, No. 5, pp. 1169-1184

Runkle, James R. *Patterns of Disturbance in Some Old-Growth Mesic Forests of Eastern North America*.
Ecology, Vol 63, No. 5, pp. 1533-1546

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