



To: Nantahala District Ranger Troy Wasky

From: Josh Kelly, Resilient Forests Director, MountainTrue

Re: Northside Project Scoping

Dear Troy,

I am writing to submit comments on the Northside Project Scoping on behalf of MountainTrue and our 12,000 members and supporters. Our members value the Northside Project Area for its unique biodiversity, its hunting and fishing opportunities, and for the clean water it supplies to Cowee Creek, Alarka Creek, Connelly Creek, Savanna Creek, and the Little Tennessee and Tuckasegee Rivers. I first visited the area during the Welch Timber sale in 2005. I also took a trip to the area with you and your staff and made several trips to the area with the Nantahala-Pisgah Forest Partnership. As such, I am very familiar with a large part of the project.

Positives

There are several positive aspects to the project, some of which have changed or improved since the project was first discussed. First, there is no longer commercial timber harvest planned for any North Carolina Natural Heritage Areas. This is a positive because many of the rare species in the area are sensitive to ground disturbance and this cautious approach means rare plants and animals are likely to persist in the project area.

Second, the controlled burns and woodland creation proposed for the project are well situated. Existing controlled burns, such as the one at Wolf Knob, have been very beneficial and have created some notable high elevation woodland habitat that is a proof of concept for the new burns. While I would also like to see more fire stewardship at lower elevations, these ridgetop burns look great and are creating and maintaining excellent habitat for species such as Wood Peewee and Chestnut-sided Warbler.

Third, MountainTrue is heartened to see the continued and growing partnership between the Eastern Band of the Cherokee and Nantahala National Forest in stewarding the land. Empowering the Eastern Band to co-steward Nantahala National Forest supports the development of future generations of native conservation professionals and is part of necessary repair and reconnection to these lands. It's nice to see the Forest Service following through on some of the beneficial portions of the new forest plan.

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Concerns

As noted in our comments and objection to the Nantahala Mountains Project, MountainTrue is concerned that economic incentives and timber volume targets are pushing the Forest Service to log in mesic forest types to a disproportionate and potentially damaging extent. The Forest Plan Revision and every departure analysis done in the region has demonstrated that mesic ecozones like Cove Forests, Mesic Oak Forests and Northern Hardwoods Forests have a lower proportion of early seral structure and open-canopied structure than Dry-Mesic Oak, Dry Oak, and Montane Pine ecozones. Furthermore, much of the early seral structure in mesic forest types should be coming from gaps smaller than an acre, which has been known for decades (Lorimer 1980, Runkle 1981, Runkle 1982). We are concerned that continuing to focus harvest on mesic ecozones only perpetuates land-scape scale departure from ecological integrity, while areas of dryer forest that could actually benefit from harvest go neglected.

Likewise, we have concerns with continued additions to the already bloated National Forest road system. The Northside Project adds three miles of road to the more than 2200 miles that are already on the National Forest System in WNC. Forest roads create many impacts including sedimentation of streams and introduction of non-native invasive plant species. As we have also articulated, the new forest plan does not analyze the impacts of new road construction and it is our belief that the plan, therefore, does not authorize any net increase in road mileage. Adding to our concern is the well documented backlog of road maintenance on Nantahala National Forest and the damage that causes to water quality.

Finally, we are concerned that ground-based logging techniques could be used on slopes >35% grade, which would cause damage to soil and water. The previous forest plan required that aerial cable logging occur on slopes greater than 40%, but in practice, slopes above 30% pose a substantial risk of erosion in our high-rainfall area. Unfortunately, the Northside Project makes no requirement for any mitigating harvest methods and the new forest plan is likewise toothless on this topic. We are particularly concerned with portions of units 7-18, 7-13, 7-43, and 27-39, among others. We plan to monitor the implementation and effects of harvest on all steep slope units in the area and we encourage the Forest Service to do the same and also commit to steep slope mitigations such as skyline cable harvest.

Thank you for taking the time to read and consider these comments. Please contact me if you have any questions or would like clarification on these issues.

Sincerely,

Josh Kelly

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Works Cited

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- Runkle, James R. 1981. Gap Regeneration in Some Old-Growth Forests of the Eastern United States. Ecology, Vol. 62, No 4, pp. 1041-1051.
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