Data Submitted (UTC 11): 3/14/2022 4:00:00 AM
First name: Karin
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Organization:
Title:
Comments: Please use the attached updated comments from Local Scientists for Protecting Pisgah. Thank you.

I.NOTICE OF OBJECTION Pursuant to 36 C.F.R. [sect] 219, Subpart B, the above party objects to the Nantahala and Pisgah Revised Forest Plan Final Environmental Impact Statement and Draft Record of Decision. The Responsible Officials are James Melonas, Forest Supervisor, and Ken Arney, Regional Forester. The Nantahala and Pisgah Revised Forest Plan Final Environmental Impact Statement and Draft Record of Decision were filed on January 21, 2022, with public notice appearing in the Asheville Citizen Times, initiating a 60-day objection period. This objection is timely. II. OBJECTION ELIGIBILITY The objector has submitted previous substantive formal comments during public comment periods for the Nantahala and Pisgah Forest Plan. The previous comments were within the scope of the proposed plan, specific to the plan, and had a direct relationship to the plan. Previous comments included detailed and substantive comments describing the unique conservation attributes of the Craggy/Big Ivy section of Pisgah National Forest. These attributes were not included in previous analyses by the U.S. Forest Service, nor were they included in the draft ROD or Final EIS. Additionally, the Forest Service chose not to even study the Craggy National Scenic Area proposal recommended by the Buncombe County Commission and offered no explanation for this decision. In addition, the Forest Service has presented new information in the final EIS and draft ROD with the introduction of Alternative E and the introduction of a new Forest Scenic Area management area. As indicated in 36 CFR 219.53, objectors who have not filed previous comments can still object when [ldquo]the objection concerns a new issue that arose after the opportunities for formal comment.[rdquo] The U.S. Forest Service publicly confirmed at the Buncombe County Commissioners Briefing on February 15 that this new Alternative was new information that enabled other entities to object. These comments directly address Alternative E and the Forest Scenic Area. If necessary, the objector is willing to consolidate this objection under one of the lead objectors for the I Heart Pisgah coalition or its partners. Local Scientists Protecting Pisgah Objection to the Nantahala [ndash] Pisgah Forest Plan With emphasis on the Craggy - Big Ivy area Dear Regional Supervisor Arney and Forest Supervisor Melonas, Both as a scientist with almost 40 years of experience contracting with nearly every state and federal agency in this region and as a resident whose roots go back to my great-great-great grandparents, I object to the Forest Plan, and especially for the Craggy - Big Ivy areas. The Plan does not protect all known Old Growth in the Craggy - Big Ivy area. There should be no question in retaining and protecting all Old Growth forests and forests containing Old Growth characteristics/attributes, especially those buffering Old Growth. In the eastern US, there is about 1% of the Old Growth forests estimated to be remaining. Old Growth is not just replaceable and something to be moved around. In my research I learned just how irreplaceable it is. Certainly vegetation grows back after being cut, though not necessarily the species we want. But the complex structure, diversity, and qualities are never the same, from the canopy composition down to the mycorrhizae underground. And for hard mast that is crucial for wildlife in winter, prime acorn production in trees such as white oaks doesn[rsquo]t usually even start until at minimum about 80 years or more (and oaks often don[rsquo]t regenerate well after harvest operations, but that[rsquo]s another matter). Plus many animal species need the large forest interior conditions that will be lost. There was analysis for the Plan saying that we are below the amount of young forest that should be there. I[rsquo]m not sure how the analysis was done for this (or if it was taken from the 1900[rsquo]s when so much land was cleared), but there is no such thing. Forests aren[rsquo]t crops that are certain ages [ndash] they are perpetual (and thousands of years old in the case of Old Growth) and contain trees of all ages. Virtually all forests here were thousands of years old with the exception of small disturbance patches. Certainly drier forests were more like savannahs with open understories, but were not completely open. And since fires were much more regular before suppression management, they were not often catastrophic. All of this changed with human management of the land in the last century or two. Granted, there are species related to early successional habitat that small patches could be managed for. But these should not be created in forest interior locations. They should be centered in areas that already have open habitat. And taken in context, there is plenty of early

successional forest land within WNC and adjacent to the Nantahala/Pisgah (N/P). Plus there is early successional habitat along the forest roads. All of these have browsing material and our current white tail population appears to be doing fine (not that we should be skewing forest management for this one species anyway). And there are occasional stands that were degraded in the past (such as stands that were harvested and planted in white pine plantations) in which certain types of harvest would be helpful, but these are rare. And it is virtually guaranteed (with my almost 40 years of experience in the field to back it up) that when areas are opened up even just for the logging roads, that invasive non-native species will get a foothold and will degrade the forest and be detrimental for native species. The Plan[rsquo]s disturbance data appear to have inaccurate methodology. The Plan recommends larger patches of disturbance areas than would naturally be found. Plus it doesn[rsquo]t take into account that the natural disturbances will continue to be happening. Thus, the manmade disturbances added to the natural disturbances will create much too heavy a disturbance pattern in the forests. Furthermore, the effects of climate change (which will also be increasing disturbances due to more severe weather) were also not taken into account when analyzing disturbance needs. One of the core goals of the Forest Service is upholding biodiversity. Since Big Ivy is one of the top three places on the N/P for Old Growth, good quality forests buffering the Old Growth, and biodiversity, why would we NOT retain it for this management goal? And within and adjoining Craggy-Big Ivy are NC Natural Heritage Areas and many rare species. Sustainability is important to our region, and the Plan should be a part of this. Buncombe County has goals for sustainability. Maintaining native biodiversity is one key to sustainability. And, this is an important concept, one of the best and fastest ways to combat climate change is by retaining Old Growth. This has vastly more positive impact than planting trees. Old Growth and mid-age intact forests absorb CO2 and reduce climate change by sequestering carbon. Economic sustainability is also a crucial local issue. It appears that there are no permanent jobs provided from logging Craggy-Big Ivy. However, our local economy depends upon tourism and recreation and these generate a vast amount of jobs in our area. Craggy-Big Ivy has important trails, waterfalls, and scenic views from one of the most visited national parks, all of which need protection. The Forest Service planning did not take into account the majority of the public[rsquo]s desire for the forests. It failed to study the Craggy National Scenic Area proposal (which takes in all of the 16,000 acre Craggy-Big Ivy area), which was the most popular and publicly supported portion of the entire Forest Plan. It has seemed throughout the planning process the last several years as if one pro-logging comment would be given equal weight with 100 [lsquo]protection[rsquo] comments. The Forest Service has not listened to the 10,000 pro-protection comments. Nor have you listened to the recommendation to protect Craggy-Big Ivy by the Nantahala Pisgah Forest Partnership. Nor have you listened to the government resolutions passed by Buncombe County and the City of Asheville, which seem like unprecedented measures. The reason these were passed is due to the strength and quantity of citizen support for Craggy-Big Ivy[rsquo]s protection. Each of these are very serious factors and are quite unusual for a National Forest to receive. These were definitely not taken into account. Remedies: The Forest Service failed to properly evaluate 4,000 acres of forest in the proposed Craggy National Scenic Area and Craggy/Big Ivy section of Pisgah National Forest in its draft ROD and FEIS. It also failed to include these key conservation and recreation areas in its Forest Scenic Area designation. Accordingly, the Forest Service must amend its plans to include 4,000 acres of Snowball Mountain, North Fork, Shope Creek, and Ox Creek in its Forest Scenic Area. It must also study and recommend the Craggy National Scenic Area. In addition, it must adopt the following remedies for Alternative E supported by the vast and overwhelming majority of forest users: ? Protect all 101,000 acres of the most important conservation area, including the I Heart Pisgah Key Conservation Areas and Mountain Treasures. ? Protect all old-growth forests. ? Prohibit logging on steep slopes. Prohibit logging in the Appalachian Trail viewshed and other major trail corridors. Prohibit logging within 100 feet of all waterways, including ephemeral streams. ? Protect ALL of Craggy as a National Scenic Area. ? Fully evaluate climate and carbon storage benefits of intact, mature forests in all management decisions. ? Include full and robust protections for ephemeral streams. ? Protect all of the State Natural Heritage Areas. ? Include species-specific plans and robust, enforceable protections for their habitat. ? Accurately account for natural disturbance and old-growth forests in all modeling. ? Include more youth and diverse voices in forest decision making. ? Adopt the Nantahala Pisgah Forest Partnership Agreement. ? Adopt the Nantahala Pisgah Forest Plan Agreement. ? Protect the six PARCAs[mdash]Priority Amphibian and Reptile Conservation Areas[mdash]on the Pisgah-Nantahala National Forest as a starting point for safeguarding herpetological and rare species diversity. ? Adopt an accurate and

consistent all-lands approach that considers the plan [ldquo]in the context of the broader landscape[rdquo] as required by the 2012 Planning Rule. Please change the Plan in accordance with the science and for the good of the people affected by it. Thank you very much.