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Organization: Carolina Mountain Club

Title: Chair, Conservation Policy and Advocacy Committee

Comments: The Carolina Mountain Club's objection to the Land Management Plan and Response to Comments (RTC, Appendix A to the Final Environmental Impact Statement) is attached as the following PDF file.

Carolina Mountain Club Objection - Revision of the Land Management Plan for the Nantahala and Pisgah National Forests.pdf

Michael Fisher

Chair, Conservation Policy and Advocacy Committee

Carolina Mountain Club

Conservation@carolinamountainclub.org

Carolina Mountain Club Objection concerning Multi-Use Trail Policy and Procedure in the Land Management Plan for the Nantahala and Pisgah National Forests and the Final Environmental Impact Statement

1. The objector's name and address along with a telephone number or email address if available. Carolina Mountain Club

P.O. Box 68 Asheville, NC 28802

Michael Fisher

Chair, Conservation Policy and Advocacy Committee

conservation@carolinamountainclub.org

2. Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the objection);

1. Identification of the lead objector, when multiple names are listed on an objection. The Forest Service will communicate to all parties to an objection through the lead objector. Verification of the identity of the lead objector must also be provided if requested;

Michael Fisher

Chair, Conservation Policy and Advocacy Committee

conservation@carolinamountainclub.org

1. The name of the plan, plan amendment, or plan revision being objected to, and the name and title of the responsible official;

Land Management Plan for the Nantahala and Pisgah National Forests R8 MB-160, January 2022

James Melonas

Forest Supervisor, National Forests in North Carolina

Ken Arney

Regional Forester, USDA Forest Service Southern Region

1. A statement of the issues and/or parts of the plan, plan amendment, or plan revision to which the objection applies;

The Carolina Mountain Club submits this objection to the U.S. Forest Service (USFS) based on USFS' failure to respond adequately, in the Land Management Plan (LMP) and Response to Comments (RTC, Appendix A to the Final Environmental Impact Statement), to the CMC's substantive and detailed comment on multi-use trail policy matters.

1. A concise statement explaining the objection and suggesting how the draft plan decision may be improved. If the objector believes that the plan, plan amendment, or plan revision is inconsistent with law, regulation, or policy, an explanation should be included;

As part of the Club's comments on the Proposed Land Management Plan for the Nantahala and Pisgah National Forests and the accompanying Draft Environmental Impact Statement for the Proposed Plan, the CMC provided, in Section 3 of its comment, a detailed, substantive discussion on policy and procedure pertaining to multi-use trails.

CMC's comment on multi-use trail matters pertains specifically to the Dispersed Recreation section of the Proposed Plan (pages 113-117), which refers at several points to multiple categories of trail use - to hiking, biking, and equestrian trail use - and associated issues of "user conflict." Although the Proposed Plan discussed these matters of multi-use trails, the Proposed Plan did not discuss policy, considerations or process for decisions regarding multi-use trails, whether for potential conversion of existing hike-only trails to multi-use status, or development of new multi-use trails. As we wrote in our public comment, the CMC assigns very high importance to these issues, as they impinge substantially on the hiking experience, including the potential for adverse impact on hiker safety, and on trail maintenance needs.

Because mention of multi-use trail matters is scattered throughout the Dispersed Recreation section of the Proposed Plan, the CMC set aside a separate discussion, in the context of Dispersed Recreation, focused on issues of multi-use trails.

CMC's comment outlined policy principles, factors and criteria to be taken into account in decisions regarding multi-use trails and process for those decisions and implementation, including follow-up monitoring of previous hike-only trails that have been converted to multi-use status (see pp. 16-22 of CMC's public comment to the FS). CMC also outlined considerations concerning multi-use trail-related decisions in new trail development (see p. 23 of CMC's public comment).

Within the LMP framework of Desired Conditions, Objectives, Standards, Guidelines, and Suitability, CMC's comment on multi-use trails addresses matters of Desired Conditions and Objectives (our policy principles), Standards (our factors), and Guidelines (our criteria). Overall, our comment addresses the concept of Suitability, in terms of when and whether it may be appropriate for an existing hike-only trail to be converted to multi-use

status (hike and mountain bike), and when and whether it may be appropriate to develop a new trail as a multi-use trail (hike and mountain bike) as opposed to a hike-only trail.

We provide an example to illustrate our application of these concepts in the Club's comment:

* A Policy Principle in our comment is that existing hike-only trails should not be converted to multi-use (hike and mountain bike) when such conversion would cause a safety hazard to hikers.

* Factors to be considered in applying this policy principle include: the sightline that is available for hikers and mountain bikers to see each other on a trail; the steepness of the trail, which affects the speed at which mountain bikers would approach hikers; the width of the trail, which provides the space needed for mountain bikers to go around hikers; and the character (steepness, ruggedness) of terrain adjacent to the trail, which may provide a buffer for mountain bikers to safely pass hikers.

* Criteria for applying these factors would include a minimum sightline distance, a maximum steepness of the trail, a minimum width of the trail, and the availability of appropriate buffer terrain for mountain bikers to safely pass hikers.

CMC's comment outlined policy principles, factors, and criteria for several multi-use trail matters: hiker experience, hiker safety, user impact, trail maintenance. Application of these policy principles, factors, and criteria will guide determination of the Suitability for conversion of an existing hike-only trail to a multi-use trail (hike and mountain bike), and construction of new trails as multi-use trails (hike and mountain bike).

CMC's objection is based on FS's failure to respond adequately, as required by the National Environmental Policy Act, to CMC's comment on multi-use trail policy and procedure. Although we provided substantive and detailed comments as described above on matters of policy and procedure for multi-use trails, we find insufficient discussion in the RTC and LMP of these matters, generally, and of the CMC comment, specifically. The RTC and LMP discuss issues of multi-use trails and user conflict (RTC pp.103-104, 107, 110), and indicate that "collaborative trail planning and management" (RTC, p. 107) will address these issues, during the indicated 5-7 year planning cycle, and presumably at the time of individual project planning. However, in our view, these matters are of such consequence (as indicated by the extent and detail of our comment), that the FS should articulate policy principles, factors, and decision criteria in the LMP, now, as the LMP will guide these decisions for the next 10 or more years. In summary, the LMP's Desired Conditions, Objectives, Standards, and Guidelines should incorporate decision-making guidance addressing these matters.

In addition, regardless of the FS's current decision relative to the policy preferences expressed in our comment, the FS should acknowledge and explain its assessment of CMC's comment, in accordance with NEPA requirements.

The preceding sentences comprise CMC's proposed remedy to the LMP: (1) articulate policy principles, factors, and decision criteria concerning multi-use trail planning, preferably as outlined by CMC, in the LMP's Desired Conditions, Objectives, Standards, and Guidelines; and

(2) explain the FS's evaluations and decisions relative to CMC's comment.

1. A statement that demonstrates the link between the objector's prior substantive formal comments and the content of the objection, unless the objection concerns an issue that arose after the opportunities for formal comment

Our discussion in section (6) addresses directly the link between our prior formal comments and the content of the objection, specifically regarding the deficiencies of the RTC and LMP in not articulating policy principles, factors, and decision criteria concerning multi-use trail planning in the LMP; and not explaining the FS's evaluations and decisions relative to our comment.

1. All documents referenced in the objection (a bibliography is not sufficient), except the following need not be provided:

1. All or any part of a Federal law or regulation,
2. Forest Service Directive System documents and land management plans or other published Forest Service documents,
3. Documents referenced by the Forest Service in the planning documentation related to the proposal subject to objection, and
4. Formal comments previously provided to the Forest Service by the objector during the proposed plan, plan amendment, or plan revision comment period.

CMC's objection includes no references requiring submission of additional documents.