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First name: Will

Last name: Harlan

Organization: I Heart Pisgah

Title:

Comments: I Heart Pisgah's objection is attached.

March 18, 2022

Ken Arney, Regional Forester James Melonas, Forest Supervisor National Forests in North Carolina ATTN:  
Objection Coordinator

160 Zillicoa St., Suite A Asheville, NC 28801

RE: Objections to the Revised Forest Plan for the Pisgah and Nantahala National Forests

CC: Randy Moore, Chief, U.S. Forest Service, 1400 independence Avenue SW, Washington, DC 20250-0003

Dear Ken Arney, James Melonas, and Objection Team,

Pursuant to 36 C.F.R. [sect] 219.54, the Forest Plan Report Card Coalition hereby submits these objections to the Nantahala and Pisgah National Forests' Land Management Plan (Forest Plan).

Responsible Official and Ranger District

The responsible official who will approve the Record of Decision and the revised Forest Plan is Forest Supervisor James Melonas, National Forests in North Carolina, 160 Zillicoa Street, Suite A, Asheville, NC 28801. The responsible official for the list of species of conservation concern is Regional Forester Ken Arney, USDA Forest Service Southern Region, 1720 Peachtree Road NW, Suite 760S, Atlanta, GA 30309.

Timeliness

These objections are timely filed. The 60-day notice of opportunity to object to the final plan and final Environmental Impact Statement and the availability of Draft Record of Decision for the Nantahala and Pisgah National Forest Plan Revision, was published on January 21, 2022 in the Asheville Citizen-Times.

The Objector

I Heart Pisgah Coalition Represented by: Will Harlan iheartpisgah@gmail.com

Connection Between Prior Specific Written Comments and the Content of the Objection

The objector has previously submitted detailed, substantive formal comments in the Draft Revised Forest Plan and the Draft EIS. Comments were submitted via CARA on June 29, 2020.

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 "the objection concerns a new issue that arose after the opportunities for formal comment." 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.

## SUMMARY OF OBJECTION

The Final Plan's Alternative E fails to justify the need for quadrupling timber harvests. It also fails to protect the entire proposed Craggy National Scenic Area. It fails to protect federally listed species and species of conservation concern and degrades biological diversity across the forest. It fails to protect federally listed species and species of conservation concern and degrades biological diversity across the forest.

The Final Plan's Alternative E proposes a massive increase in additional roads without adequate justification or analysis of impacts. It also fails to protect ephemeral streams. It fails to prohibit logging on steep slopes. It fails to take an all-lands approach as required by the 2012 Planning Rule. It fails to protect key conservation areas, including North Carolina Natural Heritage Areas, old-growth forests, and additional Wilderness and Wild and Scenic Rivers. It fails to analyze the impacts of increased herbicide use. Significantly, it fails to address climate and the carbon storage benefits of old forests, and it fails to include adequate environmental justice analysis and considerations.

The Nantahala-Pisgah Forest Plan should not quadruple logging and weaken protections for the most popular national forest in the country. Instead, it should adopt the following remedies:

- \* Protect all 101,000 acres of the most important conservation areas, including the I Heart Pisgah Key Conservation Areas and Mountain Treasures.
- \* Protect all remaining 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.
- \* Reduce logging targets, road-building targets, and herbicide use across the forest.
- \* 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.
- \* 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 "in the context of the broader landscape" as required by the 2012 Planning Rule.

## REASONS FOR OBJECTION

1. Alternative E fails to justify the need for quadrupling timber harvests.

The Final Plan calls for quadrupling timber harvests, yet natural disturbances and climate change stressors are playing an increasingly prominent role in the creation of early forests that neither the Final Plan nor the FEIS adequately considers. Using the best available science, the Forest Service must assess these impacts into the next fifty years rather than restarting its natural disturbance modeling at 1950 baseline levels. The Forest Service should further explain in the EIS the limitations of using vegetation management to simulate natural disturbance in the creation of early successional habitat.

The Final Forest Plan's approach to using timber harvests as a tool for ecological restoration is further flawed because it fails to consider where, when, and why logging is appropriate to achieve the desired condition of creating young forests. The Final Plan does not consider the quality of existing habitats, their location, and species diversity. Forest types based on age classes are not fungible units and the Forest Service should

carefully consider in the EIS how location, elevation, species diversity, and other factors should be considered when determining where to use regeneration harvests to create young forests.

The plan quadruples the amount of logging in publicly owned national forests and increases road building, sedimentation of streams, invasive species, and herbicide use. Logging is now allowed in significant portions of the Appalachian Trail, Art Loeb Trail, Bartram Trail, Benton MacKaye Trail, Mountains to Sea Trail, and Trail of Tears National Historic Trail corridors. Logging is allowed in the corridor of the Mountains to Sea Trail, North Carolina's state trail. The Snowball Trail, one of the most popular hiking trails along the Blue Ridge Parkway, is placed in the highest priority logging designation. Logging is now permitted in the viewsheds of the Pisgah-Nantahala's most popular recreational trail corridors. This contradicts the forest plan's own economic analysis demonstrating that recreation generates five times more jobs and revenue than timber harvests. The plan incentivizes timber harvests over recreation, especially in dozens of the most important recreation hotspots. The Pisgah-Nantahala—the most visited national forest in the country—prioritizes timber over recreation without any justification other than a purported and inflated need for young forests. This need is inaccurate due to modeling errors and inaccurate inputs.

In addition, the plan provides no analysis of Alternative E's massive timber harvest increases on water quality or terrestrial and aquatic species. It claims that balancing age classes results in healthier forests, but it fails to address the specific impacts of quadrupling timber harvests on water or endangered species. It is impossible for a quadrupling of timber harvests to have no negative impacts on water or species, yet the plan seems to make this claim. It certainly lacks proper analysis of impacts to water and species.

It also completely fails to analyze the impact of increased timber harvests on climate. This plan will last three decades and includes over one million acres of forest across an 18-county region, yet the plan claims that the forest's role in climate is inconsequential and not worth measuring. The plan fails to meet the requirements of the 2012 Planning Rule, Endangered Species Act, and its own ecological integrity goals by dismissing climate impacts and failing to measure carbon storage of mature forests.

Finally, the plan fails to properly consider "all lands" when calculating the amount of regeneration harvests needed to create more young forests. Rather than employing an "all lands" analysis across the 18-county region, the Forest Service improperly relies on a much narrower assessment of forests on adjacent public lands to inflate the importance of regeneration harvests to create young forests in the plan area and discount the amount of young forests elsewhere in the region. Most of the broader landscape throughout the 18-county area is comprised of privately owned, younger forests and the Forest Service needs to reexamine the purported need to use regeneration harvests to create much of the same habitats. The Forest Service should adopt an alternative that entails substantially less regeneration harvests than Proposed Alternative E.

## 2. Alternative E fails to protect the entire proposed Craggy National Scenic Area.

The 16,000-acre Craggy/Big Ivy section of Pisgah National Forest is a unique and special section of the Pisgah Nantahala National Forest that has widespread public, political, stakeholder, and local community support to be designated a Craggy National Scenic Area.

The Craggy/Big Ivy section of Pisgah National Forest includes world-class trails, waterfalls, panoramic views, trout streams, and ancient forests—just 15 miles from downtown Asheville, N.C. Craggy is one of the largest old-growth forests in the East, home to dozens of rare and endangered species. It also boasts some of the steepest downhill mountain biking and best trail running in the country. Climbers ascend sheer granite faces, and hikers trek beneath ancient trees and emerald spruce-fir forests.

The 1,000-mile Mountains to Sea Trail—North Carolina's state trail, stretching from the Smokies to the Outer Banks—rolls along Craggy's ridgeline. Craggy/Big Ivy also includes the mile-high, 360-degree views

from Craggy Gardens and Craggy Pinnacle along the Blue Ridge Parkway.

Water abounds in Craggy, including 70-foot Douglas Falls. Native brook trout shelter in cold headwater streams, which supply drinking water to Weaverville and Mars Hill, two rapidly growing municipalities. That water is also important to area farmers and communities.

The Craggy/Big Ivy section of Pisgah has superlative scenic character and integrity with recreational and economic importance. Over 500,000 visitors per year enjoy this area's scenic grandeur from the Blue Ridge Parkway. Around 5,000 drivers each day are greeted by the Craggy viewshed as they travel to Buncombe and Madison Counties from the north. 92% of the proposed Craggy National Scenic Area is visible from just a few popular and close-by vantage points and the immediate quarter-mile foreground of roads and trails.

Craggy/Big Ivy is surrounded by over 100,000 acres of protected wildlands, including national parklands, private conservation easements, state parklands, and two protected municipal water supplies.

Craggy/Big Ivy includes nearly 5,000 acres of State Natural Heritage Areas and a designated Research Natural Area. Craggy/Big Ivy also features some of the region's best examples of rich cove forest. Nearly every major ecozone occurs in Big Ivy, from spruce-fir forest to bottomland wetlands.

Over 10,000 people submitted comments to the U.S. Forest Service in support of the Craggy National Scenic Area. The Craggy National Scenic Area has also received unanimous bipartisan resolutions of support from the Buncombe County Commission and Asheville City Council, and over 150 local businesses and organizations support the Craggy National Scenic Area. In addition, the full Craggy National Scenic Area also has the full and immediate endorsement of the Nantahala Pisgah Forest Partnership—a coalition of 30 diverse organizations who have been working together to find common ground on the Pisgah-Nantahala National Forest since 2013.

The Nantahala Pisgah forest plan excludes 4,000 acres and places it in its highest-priority logging designation. These highest-priority logging areas in Craggy/Big Ivy include 1,500 acres of old-growth forest, the headwaters of the Ivy River (the drinking water source for the town of Weaverville), and the Snowball Trail, one of the most popular trails along the Blue Ridge Parkway. The Craggy National Scenic Area designation was also dismissed and never studied by the Forest Service without any explanation.

The best and highest use of Craggy/Big Ivy is as a Forest Scenic Area/National Scenic Area that protects this world-class viewshed, ancient forest, rare species refuge, recreational hub, and critical drinking water supply for Buncombe County.

A. The Forest plan failed to properly analyze 4,000 acres of Craggy/Big Ivy.

The U.S. Forest Service failed to adequately analyze 4,000 acres of the most important recreation and conservation areas in the Craggy/Big Ivy section of Pisgah National Forest.

The Matrix Management Area designation for 4,000 acres of Craggy overlooks multiple detailed comments from biologists, botanists, recreation leaders, and the local community highlighting the Forest Service's inadequate and inaccurate assessments of the Snowball, North Fork, Shope Creek, and Ox Creek sections of Craggy.

Rather than ground-truth and properly analyze the important values submitted by Buncombe County and its residents, the Forest Service delineated a scenic area based on a desktop analysis of visibility from a portion of the Blue Ridge Parkway. The Forest Service did not consider scenic integrity based on other significant vantage points, even though a field-verified scenic viewshed analysis was available and submitted along with the County's resolution.

Moreover, the Forest Service failed to consider the importance of the full area for protecting water resources, biological values, and recreation.

The inadequate and inaccurate analysis of Craggy failed to include any consideration of the following key attributes of the 4,000 acres placed in Matrix Management Area:

1. The significance of protecting the Ivy River headwaters. The Craggy/Big Ivy section of Pisgah National Forest is the headwaters for the Ivy River, the drinking water supply for the town of Weaverville, N.C. Craggy's headwaters also provide an alternate drinking water supply for the town of Mars Hill, and the Ivy River headwaters are also interconnected to the Asheville water system.

The Town of Weaverville is experiencing rapid population growth and development, and it is currently evaluating a multimillion dollar upgrade to its wastewater treatment facility on the Ivy River downstream of Craggy/Big Ivy. Increased sedimentation from active management in Big Ivy will have a significant impact on water treatment facility costs and water quality for tens of thousands downstream.

Guided by North Carolina regulations, in the late 1990s, both Buncombe and Madison Counties developed and enacted watershed protection ordinances controlling land use development and related issues in the watershed area. The Ivy River Source Water Protection Plan was drafted in 2013 and notes the significant impacts of logging on the Ivy River's water quality.

The North Carolina Division of Water Resources, Public Water Supply (PWS) Section, completed in 2010 a Source Water Assessment Report for the Ivy River. The assessment results indicated an Inherent Vulnerability Rating of Higher due to physical characteristics of the watershed.

The Ivy River also provides water for several local businesses and farms in the local Big Ivy community that have been advocating for stronger protections of the forest since the 1980s. The community of Big Ivy rallied to stop logging projects in the Craggy/Big Ivy section of Pisgah National Forest in the 1980s, which led to plan amendment in 1994 that suspended logging in the Big Ivy section of Pisgah.

1. 1,500 acres of old-growth forests. Over 1,500 acres of old-growth have been inventoried in the Snowball and North Fork sections of Big Ivy. These are the most important sections of old-growth forest in the region and drive priority protection, not priority logging designation.
2. Habitat for federally listed endangered species and species of conservation concern. The portions of Craggy placed in Matrix shelter a diversity of wildlife and provide habitat for federally listed species and species of conservation concern, including Carolina Northern flying squirrel, spruce-fir moss spider, rock gnome lichen, Northern long-eared bat, tricolored bat, little brown bat, and cerulean warbler.
3. Four North Carolina Natural Heritage Areas within or adjacent to Craggy. The North Fork section of Craggy shares a boundary with the 700-acre Price Creek/Coxcomb Mountain Natural Heritage Area (2157), with a collective, representational, and overall ranking of High. It also contains the 200-acre Ivy Knob Natural Heritage Area (25) and the 50-acre Ivy Creek Natural Heritage Area. The Snowball section of Craggy shares a boundary with the 500-acre Reems Creek Bowl Natural Heritage Area, which protects the Town of Woodfin's drinking water supply. It also has a collective, representational, and overall rating of High.
4. Scenic Values and Recreational Settings of the Snowball and Big Butt Trails—Snowball Trail is one of the most popular trails along the Blue Ridge Parkway. The Snowball Trail is located near the Craggy Gardens Picnic Area and Visitor Center, two of the most popular destinations along the Blue Ridge Parkway. Over 500,000 people visit this area annually. The Snowball Trail is one of the Parkway's most popular footpaths, stretching six miles along a rolling high-elevation ridgeline. The Snowball Trail includes panoramic vistas from Hawkbill Rock and ends at the Little Snowball Fire Tower cultural heritage site. The Snowball Trail corridor provides habitat for several rare bird and bat species. The Snowball Trail also connects with the Mountains to Sea Trail, North Carolina's State Trail. The Big Butt Trail is contained within the plan's scenic area, but hikers' experiences depend on the viewshed from the trail.

The trail's eponymous summit overlooks the Ivy Knob portion of the area, including areas where logging and road construction are anticipated.

1. Little Snowball Fire Tower Heritage Site: The Forest Service analysis of the Craggy/Big Ivy also fails to include any discussion of the Little Snowball Fire Tower site, an important cultural and community site for the Big Ivy community and the region. A fire tower constructed by the Civilian Conservation Corps was located at the end of Snowball Trail on a panoramic plateau that is now in the Matrix Management Area. The fire tower was later moved to the Big Ivy Community Center, but the vantage point remains significant. The tower itself, in its new location, is a source of pride and celebration. Each year, the community opens the fire tower to the public at festivals, and it is the anchor of the Big Ivy Historical Park. The tower is also a significant vantage point of areas that the Forest Service is opening for logging.

2. Shope Creek contains old-growth forest and growing recreation use. Shope Creek shelters old-growth forest and rare communities and is the closest section of national forest to Asheville. It is highly visible from the Blue Ridge Parkway. It contains waterfalls and rare species on its slopes, including several species of declining migratory songbirds like the cerulean warbler. Recent timber harvest resulted not only in harm to recreational and scenic values, but also introduced invasive plants and caused negative changes in forest composition. This area's popularity as an emerging recreation destination outweighs the board feet of timber that can be harvested here. Protecting Shope Creek for its recreation and conservation values should be the highest priority for this section of forest.

3. Ox Creek shares a boundary with the Town of Woodfin Watershed. When logging was proposed previously in the municipal portion of this watershed, massive public outcry resulted in permanently protecting this watershed from logging in 2005. Logging federal lands within this otherwise protected water supply for a rapidly growing municipality would threaten water quality and raise concerns for the communities it serves.

4. Ox Creek contains a portion of the Mountains to Sea Trail. This 1,175-mile footpath from the Smokies to the Outer Banks. It is North Carolina's official state trail and longest marked footpath. Ox Creek is also surrounded by the Blue Ridge Parkway and Southern Appalachian Highlands Conservancy conservation easements.

5. Unanimous local, political, stakeholder, and public support for protecting all of Craggy. The Buncombe County Commission has passed two unanimous bipartisan resolutions in 2016 and again in 2020 supporting the entire 18,000-acre Craggy National Scenic Area. Asheville City Council has also passed a unanimous bipartisan resolution in 2020 supporting the entire Craggy National Scenic Area. Despite including discussion of the area's future management on its agenda multiple times, the County is unaware of any substantial public opposition to the National Scenic Area proposal. Indeed, the County is aware that the Nantahala Pisgah Forest Partnership—a coalition of over 30 diverse organizations, including the forest products industry, hunting organizations, and recreation groups—have fully endorsed the entire Craggy National Scenic Area.

Over 150 local businesses and organizations have also endorsed the entire Craggy National Scenic Area. In addition, over 300 community members attended a Forest Service meeting at the Craggy/Big Ivy Community Center in February 2015 to support the permanent protection of the Craggy/Big Ivy section of Pisgah National Forest. The community center was completely filled and standing-room-only, and many additional community members waited outside in the parking lot on a cold winter evening for the opportunity to express their support for protecting the Craggy/Big Ivy section of Pisgah National Forest.

Despite this clear mandate from the local community, political leaders, stakeholders and the public, the FEIS and ROD place over 4,000 acres of Craggy in the Matrix and Interface Management Areas, which are the highest-priority timber production designations...

The Forest Plan offers no explanation for excluding 4,000 acres of Craggy/Big Ivy and placing it in timber production management.

The Forest Plan inexplicably did not analyze the proposed Craggy National Scenic Area, stating:

"Recommendation of the Big Ivy area as a National Scenic Area was considered in an alternative but not

analyzed in detail in Chapter 2 of the EIS" (Appendix A, pp. 166-167).

In the Record of Decision, the forest plan states:

"Thousands of commenters wrote in support of a National Scenic Area recommendation in the Craggy Mountains/Big Ivy area of the Appalachian Ranger District with the purpose of ensuring protection and preservation of natural resources, scenic quality, and recreation opportunities. The Forest Service recognizes the public interest in protection of this area and included a range of alternatives that respond to the desire for wilderness recommendation and resource protection in the Craggy Mountains area.

"Following the comment period, elements of the National Scenic Area proposal were folded into Alternative E which recommends an expanded area for recommended wilderness and allocates much of the remaining area as a Forest Scenic Area within the Special Interest Area Management Area. The variation in the management area allocation in the range of alternatives adequately addresses the diverse public interests and values in the Craggy Mountains, Big Ivy, Snowball Mountain, and Shope Creek areas by recognizing their ecological diversity, scenic values, and recreational uses" (p. 56).

While it is true that portions of the broader Craggy/Big Ivy area were included in different management areas in different alternatives, some portions were only considered for timber production management, such as Shope Creek and Ox Creek. Furthermore, in the only alternative in which Ivy Knob and Snowball Mountain were considered for anything besides timber production management (Alternative C), the Forest Service provided no analysis of the benefits of more protective management to address the interests expressed by the public. In other words, it appears that the Forest Service considered the protection of Ivy Knob and Snowball Mountain to have no benefits. The County strongly disagrees.

In the Final EIS, the forest plan states:

"Alternative E expands Craggy Mountain Forest Scenic Area from the original area designated in the current plan and identified in other action alternatives. The Forest Scenic Area area was increased from 1,840 acres in other alternatives to 11,501 total acres in Alternative E and renamed to the Big Ivy/Craggy Mountains Forest Scenic Area to reflect that the landscape is larger than the Craggy Mountain alone. Since this Forest Scenic Area incorporates Special Interest Area acres, as well as Research Natural Area and Recommended Wilderness Area acres, the table above reflects 8,224 acres of Special Interest Area with a desired High SIO, 3,222 Recommended Wilderness with a desired Very High SIO, and a 55 acres Research Natural Area with a desired High SIO. In total these 11,501 acres in the Big Ivy/Craggy Mountain Forest Scenic Area will comprise most of the national forest lands visible from the Blue Ridge Parkway at Pinnacle Gap and Craggy Gardens" (3-488).

This description implicitly acknowledges that portions of the Blue Ridge Parkway viewshed are NOT protected at its most popular and most photographed vista. Furthermore, this description makes it painfully clear that the Forest Service did not consider the viewshed from other portions of the Parkway or other important area vantage points.

In Appendix A, the forest plan states:

"Several campaigns and form letters included comments advocating for the Big Ivy area of the Appalachian Ranger District to be recommended for wilderness and a National Scenic Area. Commenters pointed to the area's rich biodiversity, old growth forests, clean waters, connectivity to other protected lands, scenic quality and visibility from the Blue Ridge Parkway and widespread public support for these national designations" (p.166).

The Forest Service provides no discussion anywhere in the ROD, FEIs, or Appendices for how it decided to exclude 4,000 acres of Craggy from Forest Scenic Area protection. It also provides no explanation for why it placed Snowball, Ivy Knob, Shope Creek, and Ox

Creek in its highest priority logging designations.

Only one sentence in the entire 1,500-page document indirectly addresses the exclusion of 4,000 acres of Craggy:

A portion of the Big Ivy area north of SR 197, and the western part of the Snowball Mountain area will be managed as Matrix and Interface MAs, allowing for vegetation management consistent with those MAs" (Appendix A, p. 167).

This is not analysis. A decision based on this conclusory statement would be wholly inadequate, arbitrary, and capricious.

The remedy is simple, and it already has complete local, public, political, and stakeholder support: Include the entire Craggy/Big Ivy area, including Ivy Knob, Snowball Mountain, Ox Creek, and Shope Creek in the Forest Scenic Area designation.

B. The Forest Service failed to study the Craggy National Scenic Area proposal, the most popular and publicly supported portion of the entire Nantahala Pisgah Forest Plan.

In "Alternatives Considered but Eliminated from Detailed Study," the Forest Plan states:

"An alternative that proposed specific management for the greater Craggy Mountains area including a National Scenic Area recommendation for a 16,000-acre area of the Black Mountain Geographic Area including the Craggy Mountains, Coxcomb Mountain, Snowball Mountain, Shope Creek, and Ox Creek areas. Thousands of commenters wrote in support of a National Scenic Area recommendation in the Craggy Mountains/Big Ivy area of the Appalachian Ranger District with the purpose of ensuring protection and preservation of natural resources, scenic quality and recreation opportunities. The Forest Service recognizes the public interest in protection of this area and included a range of alternatives that respond to the desire for wilderness recommendation and resource protection in the Craggy Mountains area.

"Following the comment period, elements of the National Scenic Area proposal were folded into Alternative E which recommends an expanded area for wilderness and allocates much of the remaining area as a Forest Scenic Area within the Special Interest Area Management Area. The variation in the management area allocation in the range of alternatives adequately addresses the diverse public interests and values in the Craggy Mountains, Big Ivy, Snowball Mountain, and Shope Creek areas by recognizing their ecological diversity, scenic values, and recreational uses" (2-27-28).

This two-paragraph dismissal of the most popular and publicly supported portion of the Nantahala Pisgah Forest Plan is wholly inadequate. The "variation in the range of

alternatives" does not at all adequately address the "diverse public interests and values of Craggy. Nowhere in the analysis comparing alternative land allocations for different Alternatives does the Forest Service explain how any alternative would be more or less responsive to public comments or the underlying values they sought to protect. The "public interests and values in the Craggy" section of Pisgah National Forest have been resoundingly clear and united in supporting the Craggy National Scenic Area.

The Craggy National Scenic Area proposal received more public, political, community, business, and stakeholder



support than any other component of the Nantahala Pisgah Forest Plan. The U.S. Forest Service received an unprecedented, record-setting number of comments on the Nantahala Pisgah Forest Plan. Over 22,000 comments were received by the U.S. Forest Service. 92 percent of all comments supported more protected areas in the Nantahala and Pisgah National Forest. They also supported stronger and more permanent protections for the most important recreation and conservation areas in the Nantahala Pisgah National Forest.

Over 10,000 public comments[near]half of all comments submitted on the Nantahala Pisgah Forest Plan[supported]the complete Craggy National Scenic Area.

The Buncombe County Commission has responded to its constituents who have twice filled the commission chambers in support of protecting all of Craggy/Big Ivy. Asheville City Council has also passed a unanimous bipartisan resolution supporting the entire Craggy National Scenic Area. In addition, the Nantahala Pisgah Forest Partnership has endorsed the protection of all of Craggy/Big Ivy as a wilderness and national scenic area. Over 150 local businesses and organizations have also endorsed the entire Craggy National Scenic Area.

Despite this clear mandate from the local community, political leaders, stakeholders and the public, the Forest Service arbitrarily and capriciously decided not to study the Craggy proposal in detail. Instead, it placed 4,000 acres of Craggy's most important conservation and recreation areas in the Matrix Management Area without any analysis or explanation.

The Forest Service failed to fully analyze the proposal with the most widespread public, community, political, and stakeholder support, and it offered absolutely no concrete explanation or analysis in the Forest Plan for this decision.

The Craggy/Big Ivy section of Pisgah National Forest is a unique and special section of the Pisgah Nantahala National Forest that has overwhelming public, political, stakeholder, and local community support to be designated a Craggy National Scenic Area.

The Craggy/Big Ivy section of Pisgah National Forest includes the most visited and photographed panoramic vistas, world-class trails, waterfalls, trout streams, rare species, and ancient forests[just]15 miles from downtown Asheville.

The Forest Service failed to properly analyze over 4,000 acres of the Craggy/Big Ivy section of Pisgah National Forest in its draft ROD and FEIS and failed to include these key conservation and recreation areas in its Forest Scenic Area designation. The Forest Service also failed to fully consider and analyze the proposed Craggy National Scenic Area.

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 and recommend the proposed Craggy National Scenic Area.

3. Alternative E fails to protect federally listed species and species of conservation concern and degrades biological diversity across the forest.

The plan quadruples timber harvests, but the Forest Service inaccurately and unjustifiably claims that this massive increase in timber harvests will have no negative impact on any of the federally listed species or 339 species of conservation concern. This coarse-filter analysis is wholly inadequate to address the specific needs of individual species, especially endemic species and dispersal-limited species.

At least 20 rare species have most of their habitat placed in logging-priority designations under Alternative E, but the plan provides no species-specific plans or protections. Protecting all 65,000 acres of vulnerable Natural Heritage Areas is essential for ensuring the persistence and recovery of federally listed species in the Pisgah-

Nantahala National Forest. Quadrupling timber harvests and building up to 300 miles of new roads will have a significant impact on federally listed species and species of conservation concern. Protecting all Natural Heritage Areas will ensure that core habitat for imperiled species remains.

The Pisgah-Nantahala National Forest is home to more species of salamanders than any other national forest in the country, but the plan offers no additional protections for rare salamanders. Several salamanders of conservation concern will be jeopardized by increased logging in spruce fir forests, northern hardwood forests, and cove forests. Species such as the hellbender will be affected by increased siltation and sedimentation from quadrupling timber harvests, but no analysis is provided in the plan.

The Northern long eared bat and Virginia big eared bat are federally listed species who depend on intact mature forests. Under Alternative E, the forest plan will expand logging in their habitat with no enforceable limits on gap or patch sizes, and only a general guideline of 40 acres to 80 acres. As the forest plan itself notes, Northern long eared bat and Virginia big eared bat are harmed by disturbances of less than 10 and 20 acres respectively. The plan will directly jeopardize federally listed species and their habitat.

The plan emphasizes management for a few game species like deer and turkey at the expense of hundreds of rare and endangered species. It unjustifiably concludes that species will persist despite a quadrupling of timber harvests but provides no justification for this conclusion. It also fails to meet its mandate under the Endangered Species Act to ensure that federally listed species not just persist but also recover.

The plan also rejects the protections provided by PARCAs—Priority Amphibian and Reptile Conservation Areas. Partners for Amphibian and Reptile Conservancy has proposed six PARCAs on the Pisgah-Nantahala National Forest as a starting point for safeguarding herpetological and rare species diversity. The Forest Service dismissed PARCAs from consideration with little explanation other than PARCAs alone are not adequate. However, they provide an ideal starting point for protecting reptiles and amphibians and are widely supported by the scientific community and stakeholders.

The plan's coarse filter falls short of meeting the needs of many listed species and species of conservation concern because it does not recognize the complex and nuanced relationships many species have within the forest and across the larger landscape. Many of these species are dispersal-limited and have patchy, isolated populations in the forests. Logging within these areas could have significant adverse impacts by interfering with gene flow, fragmenting important wildlife corridors, and destroying unique microclimates, leading to the potential extirpation of these species from the forests.

The fine-filter analysis is similarly deficient because the Final Plan and the FEIS do not adequately mitigate the impacts to listed species from converting thousands of acres of mid to late aged forests to young forest through regeneration harvests. The FEIS does not discuss how these silvicultural practices may uniquely impact these species by fragmenting Carolina Northern Flying Squirrel habitat, removing important roosting habitat for Indiana bats and northern long eared bats, degrading water quality for listed aquatic species, and failing to protect important habitat for the threatened noonday globe.

Both the coarse-filters and fine filters are also insufficient to fully capture and respond to the sensitivities, needs, and threats of many species of conservation concern, particularly those occurring within old growth forests, including salamanders, and several species of birds, terrestrial snails, and plants. The Forest Service needs to use a more rigorous coarse filter/fine-filter analysis so that it can more fully capture the impacts to listed and sensitive species and develop mitigation measures that are tailored to achieving viability and recovery goals.

4. Alternative E proposes a massive increase in additional roads without adequate justification or analysis of impacts.

The plan authorizes the construction of 10 miles per year of additional logging roads, the largest contributor to sedimentation of streams and rivers in the forest. Yet it provides no justification for this substantial and unprecedented increase in logging road mileage. The increased road mileage is even more unsustainable and unjustifiable when the Forest Service cannot adequately maintain its existing road infrastructure. Committing to hundreds of miles of additional roads over the life of the plan fails to meet the plan's state goal of ecological integrity and violates the 2012 Planning Rule.

Under the Final Plan, all alternatives, including the no action alternative, call for a similar, substantial increase in the miles of new roads within the Forest to accommodate future logging aimed at creating young forest conditions. More than 300 miles of new roads could be built in the next 30 years.

Roads have a wide range of impacts on the forest environment. They contribute more sediment to streams than any other land management activity, act as barriers to species migration, cause direct mortality to terrestrial and avian species, fragment habitat, serve as a vector for non-native, invasive species, increase human presence in remote areas threatening sensitive resources and lead to an increased risk of wildfires.

The FEIS does not adequately examine the direct, indirect, and cumulative effects of the increased number and mileage of roads that will invariably be constructed to accommodate this much additional logging within the Forest. The FEIS fails to discuss where these roads would be constructed, how they will impact fish and wildlife, if old logging roads will be properly decommissioned, and whether new roads can be constructed and maintained to withstand the impacts of more intense storms and rainfall events fueled by climate change.

The best available science shows that roads cause significant adverse impacts to national forest resources. The construction and presence of forest roads can significantly change the hydrology and geomorphology of a forest system, leading to reductions in the quantity and quality of aquatic habitat. Compacted roadbeds reduce rainfall infiltration, intercept and concentrate water, and contribute more sediment to streams than any other land management activity. This increased sedimentation can have a profound impact on fish and aquatic habitat as it has been linked to decreased fry emergence, decreased juvenile densities, loss of winter carrying capacity, increased predation of fish, and reductions of macro-invertebrate populations.

Roads can also act as barriers to migration. For terrestrial species, forest roads can cause direct mortality, changes in movement and habitat use patterns, and interfere with predator/prey relationships. Roads also fragment habitat, increase the edge-effects, and serve as a vector for non-native, invasive species. Forest roads can also increase human presence in remote areas threatening sensitive resources and lead to an increased risk of wildfires (as ORVs can be a significant source of fire ignition on forestlands). Climate change can also have an additional impact on roads as roads designed for storms and water flows typical of past decades may be unable to handle the effects of more extreme weather events such as increased flood severity, more frequent landslides, and changes in sedimentation rates and delivery processes. This has been made evident by the impacts of Tropical Storm Fred, which will take years for the Forest Service to fully fund and repair.

The further expansion of the road system, coupled with the Forest Service's failure to reduce its road maintenance backlog, also results in ecological issues that threaten the viability of species of conservation concern and the recovery of federally listed species. These issues need to be addressed in the EIS and the Forest Plan to comply with the requirements of NEPA and the 2012 Planning Rule. In addition to selecting an alternative that calls for substantially less regeneration harvests, the Forest Service should select an alternative that reduces the amount of new roads.

The further expansion of the road system, coupled with the Forest Service's failure to reduce its road maintenance backlog, results in ecological issues that threaten the viability of species of conservation concern and the recovery of federally listed species. These issues need to be addressed in the Forest Plan to comply with the 2012 Planning Rule. To this end, no new road should be constructed until the Forest Service reduces its

maintenance backlog.

#### 5. Alternative E fails to protect ephemeral streams.

The plan does not provide any buffers or protections for ephemeral streams. The FEIS does not analyze the impacts of having no streamside zones for ephemeral streams nor does it identify the basis for the Forest Service's decision not to have these protections. Yet the best available science, which the Forest Service must base its decisions on under the 2012 Planning Rules, supports the need for buffers for ephemeral streams. This includes recommendations from the EPA.

Several species of rare and endangered salamanders and snails depend on ephemeral streams during their life cycles. Failure to provide any buffers or protections for ephemeral streams is a violation of the Endangered Species Act and a failure of the plan to enable listed species and species of conservation concern to both persist and recover.

The Final Plan falls short of ensuring viability of vulnerable wildlife and contributing to species recovery because it contains many desired conditions that conflict with species recovery while simultaneously failing to include standards and guidelines that adequately address the conservation needs of these species.

The absence of buffers for ephemeral streams threatens the breeding habitat of many imperiled and sensitive animals, including more than two dozen species of salamanders. The Forest Service needs to establish buffers that are at least as protective as those found on other National Forests in the region.

#### 6. Alternative E fails to prohibit logging on steep slopes.

The plan allows logging on steep slopes, which will result in significantly more erosion and sedimentation, imperiling species and clogging popular rivers and creeks that are beloved among anglers, paddlers, and other forest users. This will also directly affect endangered aquatic species including the spotfin chub, Appalachian elktoe, little-wing pearly mussel, and Eastern hellbender.

In addition, the Final Plan's standards for logging on steep slopes are not equipped to deal with the impacts of erosion. The Forest Plan must require debris hazard assessments where activities are planned on slopes greater than 40%, it must require the obliteration of skid roads and temporary roads and return to the area to grade upon completion of a logging project, and it must require ditches and culverts to be maintained. The Forest Service should also prohibit any logging that is proposed on slopes greater than 40% unless it is reviewed and approved by an interdisciplinary team and the line officer, as other Forests in the Southeast require.

#### 7. Alternative E and the Final Plan fail to take an all-lands approach as required by the 2012 Planning Rule.

The 2012 Planning Rule states that a forest plan should "reflect the unit's expected distinctive roles and contributions to the local area, region, and Nation, and the roles for which the plan area is best suited, considering the Agency's mission, the unit's unique capabilities, and the resources and management of other lands in the vicinity." 36 CFR 219.2(b)(1). This "all lands approach" requires the Forest Service to "look across boundaries throughout the assessment, plan development/revision, and monitoring phases of the planning process." Preamble to 2012 Planning Rule, 77 Fed. Reg. 21162, 21173 (Apr. 9, 2012).

The FEIS contains an incomplete assessment of private and public lands and conflicting statements about the status and trends of young forests across the 18-county area. First, the FEIS limits its analysis on FIA data for privately owned timberlands, which is a subcategory of all forestland in the region based on the assumption that young forests are more likely to occur on private lands in this sub-category. Id. But this provides an incomplete picture of the total amount of young forest across the 18-counties and fails to completely capture current and

future trends for all young forests in the region.

Even under this limited analysis, the FEIS presents more questions than answers. The FEIS provides estimates of age class for private and public timberlands across the study area. An estimated 10.7 percent of private timberlands are in the 10-20 year age classes (FEIS at 3-132).

Private forest lands contain significantly more young forest than what the NRV model recommends for the forest. Not only is the proportion of young forest out of balance, but there is virtually no older growth forest on private lands. Currently, less than 2% of the forestland in the 18-county study area is 130 years or greater and all occurs on public lands. Further, some researchers have suggested that present-day amounts of young forests in northern hardwood and spruce-hardwood forests in some regions of the United States may be several times higher than in pre-settlement times.

In addition, the vast majority of forested lands in the region are privately owned and timber companies make up an increasing percentage of that ownership. According to the North Carolina Division of Forest Resources, the 18-county area of Western North Carolina is home to nearly 4 million acres of forests. The 18-county region is 76 percent forested, and over 70 percent is privately owned. Ownership of private forests in the region by timber companies has increased in the past decade. The USFS Southern Research Station concludes that private companies own three times as much forest as the U.S. Forest Service.

That private forest lands heavily skew toward young forests and woodlands, begs the question why, when viewed within the context of the broader landscape, do the Forests need so much more young forests? This specific question is not answered in the FEIS (despite several commentators posing this question in their earlier comments on the DEIS). This is a significant shortcoming of the FEIS and by not addressing this question the Forest Service has improperly foreclosed the possibility that other reasonable alternatives, which call for the creation of fewer acres of young forests exist. This runs afoul of NEPA, which requires agencies to "rigorously explore and objectively evaluate all reasonable alternatives."

It is also important that the Forest Service consider the conditions of private and state-owned lands when it comes to the protection of rare species. As the Final Forest Plan acknowledges, many plants and animals may have opportunity to thrive across the broader landscape, but those that are rare or that require special conditions may be better protected or find refuge on parts of the landscape more common within the National Forest System lands and unique habitats found there. Therefore, there may be an even greater need for additional mid-age, late-age, and old growth forest to compensate for the lack of these habitats across the broader landscape. The Planning Rules specifically contemplate instances where the National Forest may need to compensate for degraded conditions on the broader landscape or to mitigate the effects of external stressors to "contribute to maintaining a viable population of the species within its range." 36 C.F.R. [sect] 219.9(b)(2)(ii). Some of these species may include the North Carolina Northern Flying Squirrel, several federally listed bat species, and over two dozen salamander species. However, the FEIS does not examine the status and trends of these species across the broader landscape, how private lands are either contributing to or detracting from species conservation goals, and what unique role the National Forests play in providing refuge for these species.

Instead, the FEIS and Final Plan explains at length how the agency needs to create more ESH to respond to demand to provide quality hunting opportunities for a small number of "demand wildlife species," such as grouse, deer, and turkey, and has established numerous desired conditions, standards, and guidelines to accomplish this. Most of these game species, however, have either stable or increasing populations. Deer populations have been stable over the last eight years. Turkey populations have expanded in range and density in last 25 years with a slight increase in harvests. Black bears (which are considered a game species in North Carolina) have relatively stable populations, and have experienced increased populations over the last several decades. The ruffed grouse population has only experienced a slight downward trend. Moreover, species such as deer and bear are generalists requiring a range of habitats and it is projected that all these species will persist and even

increase in their populations under all alternatives, even under the no action alternative. These facts do not support the purpose and need statement to increase ESH to increase populations of game species "in decline" particularly at the expense of federally listed species and hundreds of species of conservation concern (as explained later in our comments). Rather, this framing appears to be a pretext for the Forest Service to create more open areas to increase harvest numbers for many of these species.

8. Alternative E fails to protect key priority conservation areas.

The plan fails to protect over 101,000 acres of most important conservation and recreation hotspots. The analysis that placed Wilderness Inventoried Areas, Natural Heritage Areas, Mountain Treasures, I Heart Pisgah Priority Conservation Areas, and inventoried old growth forests into Matrix and Interface contains serious methodological errors and inaccurate Spectrum and NRV model assumptions.

Alternative E also places thousands of acres of old-growth forests in highest-priority logging designations. The Forest Service explicitly and intentionally decided not to include small-patch old-growth forest in its analysis, resulting in tens of thousands of acres of inventoried, documented old-growth placed in Matrix and interface Management Areas.

Most of I Heart Pisgah's 40 key conservation and recreation areas are placed in the highest-priority logging designations, including 2,000 acres of Panthertown Valley and 4,000 acres of Craggy. Areas in Panthertown are best suited for Special Interest Area and Backcountry Management Area designations. The areas in Panthertown proposed in the draft Forest Plan as Matrix should instead be managed as Backcountry, while the core of Panthertown should remain as a Special Interest Area. All of Craggy should be protected as a Forest Scenic Area and recommended for National scenic Area designation. As the forest plan's own economic analysis concludes, recreation provides at least five times more jobs and revenue than timber.

Recreational hubs and trails should be prioritized over timber management.

1. Alternative E fails to protect North Carolina Natural Heritage Areas : Over 65,000 acres of North Carolina's Natural Heritage Areas are in the highest priority logging designations. The forest plan has arbitrarily and capriciously excluded many natural heritage areas from protection. All state Natural Heritage Areas should be excluded from the timber base. Over 70% of rare species occurrences are in Natural Heritage Areas. Protecting all of North Carolina's Natural Heritage Areas is critical to meet Endangered Species Act requirements and ensure the persistence and recovery of federally listed species. Natural Heritage Areas also protect the most important habitats for 339 species of conservation concern identified in the forest plan.

2. Alternative E fails to protect old-growth forests: The forest plan failed to take an all-lands approach and consider the context of old-growth forests in the context of the broader landscape. Less than 2% of private forests in Western North Carolina are old-growth forest, according to the Forest Service's own data in the plan. The plan violates rules by not evaluating the national forest in the broader landscape, which is dominated by young forests and lacking old-growth. This is reflected in Alternative E, which proposes thousands of acres of inventoried old-growth for active management.

The plan authorizes cutting over 44,000 acres of existing designated old-growth. Over a quarter-million acres of old growth is placed in logging-priority designations. 20 percent of the highest-priority logging lands contain known, inventoried old-growth forests.

The plan opens 300,000 acres of old-growth forest to logging and excludes it from the old-growth forest network. This is because the Forest Service's old-growth and natural disturbance models are inaccurate, built on misleading assumptions, and fundamentally flawed. The Forest Service has tweaked model inputs so that the models intentionally underestimate the amount of natural disturbance historically and overestimate natural disturbance in the future. The Forest Service is attempting to create artificial need for timber harvests and inflate

numbers for its own benefit rather than aiming for accurate NRV conditions.

The Forest Service intentionally removed protections and consideration for all small patches of old growth forest in the Pisgah-Nantahala, resulting in thousands of acres of old-growth forest now in highest priority logging designations.

1. The Final Plan fails to protect more Wild and Scenic Rivers: The plan recommends eight additional Wild and Scenic Rivers but denies 35 other qualified rivers without adequate explanation or justification. Among them, Panthertown Creek, Greenland Creek, and the East Fork of the Tuckasegee River should be reconsidered and found to be eligible for Wild and Scenic River designations. Wild and Scenic Rivers had widespread consensus among stakeholders and most communities. They also are important economic engines that can help support rural economies and protect endangered aquatic species and species of conservation concern.
2. Alternative E fails to provide an analysis of significant increases in herbicide use.

Timber harvests will require significant increase in herbicide applications. The Forest Service provides no accounting of herbicide use or increases anywhere in the plan, nor does it attempt to calculate its impact on water, soils, or wildlife. The rusty-patched bumblebee, a federally listed species, could be significantly impaired by a quadrupling of herbicide use across the national forest.

13. Alternative E contains inadequate wilderness recommendations.

The plan recommends the least possible amount of wilderness—less than half of wilderness under consideration. The plan removes one Wilderness Study Area from recommendation. The plan ignores 92% of public comments supporting more protected areas for the Pisgah-Nantahala National Forest. The plan ignores the Nantahala Pisgah Forest Partnership compromise recommendation for more wilderness. Over 100,000 acres of Wilderness Inventoried Areas are left unprotected and open to logging.

1. Alternative E fails to address climate and the carbon storage benefits of old forests: Alternative E quadruples timber harvests and includes thousands of acres of old-growth forests in Matrix and Interface Management Areas. The climate and carbon-storage benefits of mature, intact forests are not included in decision-making. This violates the 2012 Planning Rule and fails to meet ecological integrity goals.

The U.S. Forest Service is the owner of the largest stock of carbon-storage forests in the country. Yet the forest plan fails to even attempt to account for the climate and carbon storage benefits of its forest. The forest plan does not measure climate impacts of quadrupling timber harvests. As a result, this plan results in significant climate harm that will affect the region for decades.

1. The final plan fails to include adequate environmental justice analysis and considerations: under Alternative E, the forest plan will ramp up timber harvests, degrading air and water quality across the region. However, the plan does not account for these impacts, especially on communities who have already been disproportionately affected by air and water pollution. The forest plan explicitly excludes Black and Hispanic communities from environmental justice considerations. Environmental justice issues were raised by Black communities during public hearings but were not addressed by the plan.

The forest plan also ignores 92% of public comments, which called for more protected areas and stronger protections for the shared natural resources of the publicly owned national forest. These protected areas would provide air, water, climate, and economic benefits to the most historically disadvantaged communities. The Forest Service's own economic analysis shows that recreation provides five times more jobs and revenue than timber, yet the plan proceeds to prioritize timber harvests at the expense of protecting the recreation and scenic resources that drive mountain economies today.

The forest plan does not measure climate, air, and water impacts of quadrupling timber harvests on the national forest surrounding environmental justice communities.

#### REMEDIES

The Nantahala-Pisgah Forest Plan should not quadruple logging and weaken protections for the most popular national forest in the country. It should include stronger, enforceable standards and guidelines and more protected areas. Across the key areas of public engagement and concern, the Forest Service should revise the Forest Plan to include the following:

- \* Protect all 101,000 acres of the most important conservation areas, including the I Heart Pisgah Key Conservation Areas and Mountain Treasures.
- \* Protect all remaining 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.
- \* Reduce logging targets, road-building targets, and herbicide use across the forest.
- \* 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.
- \* 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 "in the context of the broader landscape" as required by the 2012 Planning Rule.

#### REQUEST FOR RELIEF

With the draft ROD and Final EIS, the U.S. Forest Service missed an opportunity to adopt widely supported, collaborative solutions that had broad, diverse public support. However, the Forest Service still has an opportunity to fix the plan with the aforementioned 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 remedies for Alternative E supported by the vast and overwhelming majority of forest users: protect all 101,000 acres of the most important conservation areas, including the I Heart Pisgah Key Conservation Areas and Mountain Treasures; protect all remaining 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; reduce logging targets, road-building targets, and herbicide use across the forest; 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; 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 "in the context of the broader landscape" as required by the 2012 Planning Rule.

Thank you for considering this objection.

Sincerely,

Will Harlan

I Heart Pisgah