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Comments: March 21, 2022 ATTN: Objection Coordinator

National Forests in North Carolina

160 Zillicoa Street, Ste A Asheville, NC 28801

Objections to antahala and Pisgah National Forests Decision Notice on a New Land Management Plan

Dear Forest Supervisor James Melonas,

We would like to thank the U.S. Forest Service and all participating stakeholders and partners who were involved in developing the Plan. We appreciate the amount of work that went into its creation, and we are grateful for the opportunity to have participated in the revision process as a nonprofit partner with the U.S. Forest Service.

Our organization, Friends of Panthertown, had previously submitted substantive formal comments about the Plan during 2017 and 2020. We have the same concerns now with this Plan as when we submitted our comments before "Alternative E" was presented. We have objections with the Plan based on what we identify as inadequate protections for Panthertown.

Friends of Panthertown works in partnership with the U.S. Forest Service to conserve Panthertown as a backcountry natural resource and to enable sustainable recreation. We have worked closely with U.S. Forest Service since 2005, with a formal partnership and Volunteer Agreement created in 2007, renewed in 2011, and newly revised in 2021. Panthertown has seen an exceptional increase in recreational usage since our comments were submitted in 2020. The need for exceptional protections from prescribed burning and timber harvests for Panthertown, particularly within its recreational corridors, are much greater now than ever before.

Our organization provides funding for resource protection and conservation projects throughout Panthertown. We fund and provide trail construction, maintenance, and recreational improvements along the 30-mile Panthertown Valley Trail System, and within its recreational corridors, and we provide Leave No Trace and Bear Wise education in Panthertown, and in the community. We provide public stewardship opportunities, trainings, and the coordination of hundreds of volunteers each year who have contributed thousands of hours to improve the recreational opportunities in Panthertown for the benefit of the public. We collaborate with our partners, including the U.S. Forest Service, to conserve Panthertown, engage its stakeholders, and educate the community. Only with strong public support and cooperative partnerships can we continue to develop and sustain our work in Panthertown.

Thank you for your consideration of our objections. We look forward to our continued partnership.

Jason Kimenker

Executive Director

On behalf of Friends of Panthertown Board of Directors and Staff: Margaret Carton, President; Mike Purdy, Vice-President; Virginia Willard, Vice-President; H.A. Moore, Governance Chair; Paul Johnson; Mike Kettles; Margo

Purdy; Nancy West; Jason Kimenker, Executive Director; Krista Robb, Trail Stewardship Coordinator; Kara McMullen, Stewardship Assistant

## OBJECTIONS & SUGGESTIONS TO IMPROVE PLAN

In February 2020, the U.S. Forest Service release a proposed land management plan with four alternatives. After many years participating in the revision process, we endorsed the Forest Plan Alternative provided to the U.S. Forest Service in June 2020 by the Nantahala-Pisgah Forest Partnership. We continue to seek the Panthertown protections recommended in its compromise.

We have specific objections to the fifth new management option, [ldquo]Alternative E[rdquo], and we have provided suggestions to improve the Plan as it relates to Panthertown. We appreciate the Plan[rsquo]s emphasis on partnerships and collaborations as indicated in HD-GLS-19 through HD-GLS-2 (Pages 175-176), and we agree with HD-GLS-14 (Page 175) to manage Panthertown Valley in consideration of its unique features: Emphasize management actions that support and sustain the unique scenery, recreation activities, and experiences for visitors engaged in sightseeing, hiking, horseback riding, mountain biking, fishing, and climbing.

### Management Area: Special Interest Areas

While we appreciate that some parts (3,552 acres or 38%) of Panthertown are being considered by the U.S. Forest Service to be managed as Special Interest Areas (Pages 225-226), we recognize that Panthertown Valley, where most visitors come to recreate, contains 6,311 acres, part of a larger 9,266 acres of public land comprising the full Panthertown Backcountry Complex.

We object to only 2,761 acres of Panthertown Valley, 542 acres of Bones Defeat, and 249 acres of Dismal Falls (Table 11, Page 228) being designated for Special Interest Area management protections.

All of Panthertown Valley, Bonas Defeat, and Dismal Falls, as located within the Panthertown Backcountry Complex ([ldquo]Panthertown[rdquo]), should be designated as Special Interest Areas. Those areas in Panthertown defined in the Plan as Matrix management should instead be managed as Backcountry, while the core of Panthertown and its recreational corridors should remain strongly protected as Special Interest Areas.

SIA-DC-02 and SIA-S-04 (Pages 225-226): We object to prescribed burning and timer harvests being used as maintenance within the Special Interest Areas under most circumstances. Management of Panthertown should restrict prescribed burning and timber harvesting within 50 feet of system trails, kept outside of popular recreational corridors, and away from Special Interest Areas, unless such activities be deemed absolutely necessary to maintain the outstanding ecological qualities of Panthertown and/or such activities are essential for the maintenance of public safety.

SIA-DC-04 and SIA-S-02 (Pages 225-226): Recreation and conservation should be prioritized over increased timber harvests, with a focus on protecting its trails, clean water, scenic views, rare species, wild places, and old growth. The Plan should reflect that backcountry recreation is its primary use and that Panthertown will be managed primarily with that use in mind. The U.S. Forest Service should manage Dismal Creek, Dismal Falls, and Big Pisgah area on Pisgah National Forest as Special Interest Areas and Backcountry. The Plan should specify that vegetation and ecosystem management within the Panthertown Special Interest Areas should recognize recreation values and be solely for the purpose of restoring and enhancing the ecological integrity and values of the area. The U.S. Forest Service should protect existing old growth forest areas and restore other areas to expand old growth forests for future generations.

The Plan should include stronger protections for rare, threatened, and endangered species, and dispersal-limited species. The draft plan fails to adequately address the impacts of increased timber harvests on rare and

dispersal-limited species. The U.S. Forest Service should also adapt better timbering practices and improve road and trail maintenance to reduce erosion and sediment pollution. On page 173, the Plan indicates, [ldquo]The Panthertown area is unique as it is in a high elevation valley within a matrix of dry-mesic, mesic, and acidic cove forests with a cluster of prominent granitic domes overlooking one of the region[rsquo]s largest Southern Appalachian bogs. All ecozones within this geographic area are in need of more young forest conditions. More open forest is needed in mid- to late-seral stages. An overabundance of offsite white pine has impacted the area[rsquo]s species diversity.[rdquo] [hellip] [ldquo]Southern Appalachian bogs within the geographic area support federally listed swamp pink and mountain pitcher plant as many other SCC. They are threatened by woody plant encroachment and non-native invasive plant infestations.[rdquo]

While we are in support of properly managing the bog areas, we have concerns about overly broad language used in HD-GLS-02 (Page 174) and how it could affect Panthertown: HD- GLS-02 - Provide woodland habitats and young forest in oak-dominated and pine-oak heath ecozones to achieve desired conditions for more early and open mid- and late-seral stages. To accomplish this, reduce mesic species encroachment through prescribed burning and harvest at appropriate locations.

Furthermore, we agree with HD-GLS-07 to maintain and enhance unique tannic, sandy bottom stream habitat within the Panthertown Creek watershed to provide quality habitat for native aquatic species, and hope to have these creeks reconsidered for Wild and Scenic designation.

ManagementArea:Wild&ScenicRivers

The Plan excludes the outstanding streams which form the headwaters of the Tuckasegee River. We were disappointed that the U.S. Forest Service did not find Panthertown Creek, and Greenland Creek eligible, and we believe the U.S. Forest Service should correct that error when the plan is finalized. These streams in Panthertown should have been found eligible for protection under the Wild and Scenic Rivers Act. The primary benefit of Wild and Scenic designation is to keep streams free-flowing and free of impoundments. Panthertown Creek, Greenland Creek, and the East Fork of the Tuckasegee River (totaling 8.6 miles) should be reconsidered and found to be eligible for Wild and Scenic River designations to receive the maximum possible protections. The Forest Service should strengthen water quality protections and ensure that all Outstanding Resource Waters are named and protected in the Forest Plan. Stream protection standards should meet or exceed those currently set for other Southern Appalachian National Forests such as the Chattahoochee, the Cherokee, and the Jefferson.

Panthertown protects the wild and scenic streams comprising the headwaters of the East Fork of the Tuckasegee River in the Little Tennessee River Basin, classified as Outstanding Resource Waters, and features the only catch-and-release section of the popular Western North Carolina Fly Fishing Trail[reg]. Panthertown is known for providing a world-class fishing experience while protecting its native brook trout population.

The North Carolina Department of Environmental Quality Division of Water Resources has classified Panthertown[rsquo]s waters as Outstanding Resource Waters, a watershed that has been determined to have excellent water quality, and exceptional ecological and recreational significance. In Panthertown these Outstanding Resource Waters (ORW) on Nantahala National Forest include surface water classifications of Water Supply (WS-III) and ORW for Panthertown Creek (stream index 2-79-1), Greenland Creek (2-79-2), Little Green Creek (2-79-3), and Honeycamp Branch (2-79-4), each from their sources to the Tuckasegee River; and Frolictown Creek (2-79-1-1) from its source to Panthertown Creek, and Goldspring Branch (2-79-1-1-1) from its source to Frolictown Creek, and the east fork of the Tuckasegee River (East Fork Lake), classified as WS-III,

Class B, Trout Waters, ORW, from its source at the confluence of Panthertown Creek and Greenland Creek to Tennessee Creek (Tanasee Creek).

Outstanding Resource Waters (ORW) are a subset of High Quality Waters (HQW), a classification intended to protect waters which are rated excellent based on biological and physical/chemical characteristics through Division monitoring or special studies. The supplemental ORW classification is intended to protect unique and special waters having excellent quality and being of exceptional ecological or recreational significance, such as these examples found in Panthertown. To qualify as ORW, waters must be rated Excellent by the Division and have one of the following outstanding resource values: outstanding fish habitat and fisheries, unusually high level of water-based recreation or potential for such kind of recreation, some special designation, important component of state or national park or forest, or special ecological or scientific significance (rare or endangered species habitat). Panthertown meets several of these outstanding resource values.

While a 100-foot buffer on perennial streams is good, the Plan only affords intermittent streams a much smaller buffer, and provides no protection at all for ephemeral streams. These are the types of streams that make up the very beginning of the watershed networks we depend on. Compare this to Cherokee National Forest in Tennessee, which has a default riparian buffer of 100 feet on perennial streams and 50 feet on intermittent streams, as well as some protections within 25 feet of ephemeral stream channels.

These buffers prevent stream banks from being degraded, provide shade, and reduce sediment pollution due to timber harvesting, road building, and other development. When these protective buffers are removed, water temperatures increase and sediment makes its way into streams and rivers. That excess sediment suffocates aquatic habitats and reduces populations of species such as trout, freshwater mussels, and hellbenders.

In addition to the state ORW designations, the North Carolina Natural Heritage Program has identified more than 2,400 natural areas across the state, including Panthertown. These areas were identified by biologists to contain the best examples of natural communities, species diversity, and rare species in North Carolina. A natural area is a site (terrestrial or aquatic) of special biodiversity significance due to the presence of rare species, unique natural communities, important animal assemblages, or other ecological features. The North Carolina Natural Heritage Program lists the rare animal species found in Panthertown, including *Ameletus tertius* (a mayfly) and *Viehopera ada* (Pallid Roachfly).

See Map in Objection titled "Pantertown Area of Nantahala and Pisgah National Forests."