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Organization: Graham County Government

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Comments: Graham County is providing it's objection in the form of PDF files uploaded this day 22 March 2022 @ 1545. See attached.

To whom it may concern:

Graham County is unique compared to other counties in the Nantahala National Forest in that the forest comprises over 65% of the lands inside Graham County's borders. Only Swain has more federal land holdings than Graham in the Nantahala National Forest boundaries, with Swain's total acreage being primarily National Park lands vs. Graham's being National Forest lands.

The Graham County Board of Commissioners at this point in the Forest Management Plan process has concluded that we prefer Plan B with some modifications. Having such a large portion of our land base in the National Forest makes it necessary for Graham County to seek economic benefit from those lands. The PILT funds from that property is a pittance of its real value and Graham County needs those forest lands to generate revenue for county government and to continue to generate funding that partially supports our school system.

1. Timber sales/harvesting has been our number one goal from the onset of this process. While all alternatives increase the overall totals of timber harvest over time we don't think it goes far enough. We want to see an increase above the projections. Because Alternative B has the most land where timber production could occur, it would allow the biggest increase on paper. But, we don't want another 20 years of broken promises; we want to see work happening on the ground. If another alternative would get more done because it has more support, then the Forest Service should explain why that is the case.

2. Graham County feels that all four of the plan models have too much age set aside as back country and old growth areas. We don't disagree with the principle of old growth management and the importance of old growth and we do not believe it should be prioritized for timber production, but we do feel that the methodology of determining what is actual old growth and what is actual back country is skewed. Back country is a misleading title for how it's used in this process. Many outside the process would think of this as areas that are accessible and used for recreation purposes but that is not the case. Old growth designation is in many cases a misnomer since most of the lands inside Graham County's borders have at some point been logged and evidence of that is common. We feel that the amount of acreage in both of these designations should be reduced significantly and do not support current levels of these designations. If old growth designations are being used to restore old growth in the future as opposed to protecting actual old growth now, we understand that, but these designations should not continue to grow. If the Forest Service designates new patches, it should remove others so they can be harvested.

1. Recreation opportunities as outlined in Plan B fall short of plans C and D levels. Graham County wants to see more opportunities for recreation included in Plan B. Persons who will come to visit these National Forests provide economic benefits to the county as a result of recreational activities inside the forests. Part of that increased recreation is accomplished by better and more access to the forest. We feel that more roaded areas should be made available for use and access so that more people can enjoy the forests from within and more site development for primitive camping and group camping as well. We note that the draft plan includes the Partnership recommendation to increase open road access, and that should be kept in the final plan.

2. Graham County does not support the designation of additional Wilderness Areas and does not support the designation of Wilderness Study Areas. The limited access to the forests combined with current management practices in our opinion literally creates wilderness areas by taking no action. The current restrictions on areas where some activity like timber harvest has been done doesn't allow for continued activity in those areas for a

period of years after the harvesting has been completed thereby in a sense creating a wilderness like area. We feel that no area should be off limits to future activity simply because it may have had some activity in the past. We also recognize that the Partnership has agreed that Snowbird should not be designated wilderness until other needs are met first, and we welcome the Partnership's help to meet economic needs. Management has been out of balance in Graham County and wilderness supporters need to prove that economic development can be balanced with wilderness.

3. Graham County feels that many of the processes used across the US Forest Service management plans are cumbersome and flawed. Example is the NEPA process that could be and should be completed in less than 12 months but often takes years to complete. We believe many of the processes should be streamlined to use data that is constantly being collected and cataloged. The data gathered during the years of plan revision should be used to make decisions that will make projects move more quickly.

Graham County desires to have a good working relationship with the US Forest Service. Having economic benefit from the forests from multiple means is critical to the needs of our citizens. We hope that you will consider our point of view going forward and look forward to the completion of the planning process and its implementation.

Dale E. Wiggins

Chairman, Graham County Board of Commissioners

RE: Objection to the Revised Nantahala and Pisgah Forest Plan Final Environmental Impact Statement and Draft Record of Decision: OBJECTOR Graham County Board of Commissioners Connie Orr, Chair 12 North Main Street Robbinsville, NC 28771 (828) 479-7961 Connie.orr@grahamcounty.org NOTICE OF OBJECTION AND STATEMENT OF REASONS Submitted via electronic portal: Nantahala and Pisgah National Forests Plan Revision Objection Ken Amey Regional Forester USDA Forest Service Southern Region 1720 Peachtree Road NW Suite 760 Atlanta, GA 30309 James Melonas Forest Supervisor United States Forest Service ATTN: Objection Coordinator 160 Zillicoa Street, Suite A Asheville, NC 28801 cc: Randy Moore, Forest Service Chief, U.S. Forest Service Headquarters, 1400 Independence Avenue, SW, Washington, D.C., 20250-0003 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 Official is James Melonas, Forest Supervisor, and the Reviewing Officer is Ken Amey, Regional Forester. The Nantahala and Pisgah Revised Forest Plan Final Environmental Impact Statement and Draft Record of Decision were published on January 21, 2022, with public notice appearing in the Asheville Citizen-Times, initiating a 60-day objection period. This objection is timely. PREVIOUS COMMENTS The Graham County Board of Commissioners has submitted previous comments during the public comment process for the Nantahala and Pisgah Forest Plan. These comments addressed issues specific to the proposed plan. The Graham County Board of Commissioners submitted unanimous resolutions and letters in 2015, 2016, and 2020 addressing specific components of the proposed plan. The County's comments have supported an increase in timber production within Graham County and stated opposition to any additional Wilderness or Wild and Scenic River designations within Graham County, while also supporting additional recreational opportunities on Forest Service property in Graham County. The comments stated the County's view that too much acreage was being designated as old growth in all plan alternatives that were made public by the Forest Service in 2020, and stated concerns about the process used by the Forest Service in determining old growth designations. In addition to opposing any additional inclusion of land in the National Wilderness Preservation System, the County's comments expressed opposition to Forest Service treatment of other management areas that effectively creates wilderness conditions without the land being designated as wilderness. The County also expressed its concerns regarding the lengthy internal processes used by the Forest Service, including the NEPA process, in order to execute projects. The Nantahala and Pisgah Revised Forest Plan Final Environmental Impact Statement and Draft Record of Decision published in January of 2022 introduced a new alternative that was not available during previous opportunities for public comment and input. The final proposed alternative includes excessive old growth designations, recommends additional land for wilderness designation, and increases acreage of areas such as an excessive

Appalachian Trail Corridor buffer that includes extensive restrictions on timber harvest. The terminology used in the plan makes it extremely difficult to understand its true impact on timber harvest and recreation opportunities.

**REASONS FOR OBJECTION**

Graham County is a small county by landmass, with Forest Service land comprising 65 percent of the county's lands. Graham County is also isolated from towns in neighboring counties in both North Carolina and Tennessee. Graham County is economically distressed, being designated as a Tier 1 (most distressed) county by the NC Department of Commerce, and as an at-risk county by the Appalachian Regional Commission. In addition to Graham County's size and distance from nearby towns in neighboring counties, large swaths of federal lands within Graham County disconnect portions of privately owned lands within the county. The county must still provide service to citizens who live in these areas, resulting in increased costs for law enforcement, first responders, school transportation, solid waste services, and other areas. In addition to increased costs to the county, the creation of these small pockets of private land within the county places limits on opportunities for full use of private property for personal and business use, limiting the overall economic growth of Graham County. Graham County is forced to finance its essential county services with the limited tax base provided by the 35 percent of privately owned lands within the county. Federal programs, such as Payment in Lieu of Taxes and Impact Aid, are inconsistently funded and do not adequately compensate for the lost tax value of the land that is under federal ownership. Every year when creating its budget, Graham County is forced to balance the need for services with the ability of its property-owning citizens to afford the taxes necessary to cover these services. These same citizens are limited in their ability to be financially successful by the amount of federal land within Graham County and are further limited by excessive restrictions on the use of such land. Inadequate maintenance and upkeep of Forest Service recreational facilities, and limitations on recreational opportunities within the Forest, place limitations on Graham County's tourism, impacting the county's sales tax base. Restaurants, retail stores, overnight accommodations, and adventure/tour guides are all negatively impacted by restrictions on recreational opportunities within the Forest. Graham County has worked for decades to make the best of the unique limitations created by the amount of federal lands within its borders. The county's only ability to raise significant revenue on its own is through the property tax and the sales tax. The ability to increase the sales tax is limited by state statute, and the county's economically distressed citizens cannot afford constant increases in property taxes to keep up with the rising cost of services. Graham County desires to help itself and grow its own economy, enabling citizens to pursue opportunities that increase incomes and improve their financial stability, increasing private investment in Graham County and thereby increasing the tax base to fund needed services while maintaining a reasonable tax burden for all citizens. In order to do this, the forest plan must provide every reasonable opportunity for Graham County's citizens to benefit financially from the maintenance and use of Forest Service property within the county. This includes responsible timber harvest, opportunities for wildlife management, access for recreation purposes, and upkeep of recreational facilities.

**SUMMARY OF OBJECTION**

The new Alternative E, as published, places additional restrictions on timber harvest by designating old growth areas based on outdated legacy systems that do not adequately account for all needs, recommending areas for wilderness designation that were previously under wilderness study, and placing layers of restrictions on use within special management areas that effectively treat the management areas as wilderness without designating them as such. The plan places more pressure on outside entities, such as local governments, to help with improvements for recreation opportunities, timber harvest, and wildlife management. The plan also does not account for streamlining administrative processes to carry out even those projects that would be allowed under the plan. The plan is also difficult to understand, and the unveiling at the last minute of a completely new, previously unpublished alternative, places limits on the ability of stakeholders to adequately review the final proposal. Old growth designations in the plan appear to be approached from an add-on basis, with continuously more acreage being added to old growth. The principle of old growth in the context of an overall healthy forest is understood. But actual observation of overall forest management needs would include the deletion of some old growth designations as others are added. The plan as presented simply builds on decades-old designations, without a comprehensive review of current conditions. Only approximately 160 acres of previous wilderness study area in Graham County is not being recommended for wilderness designation. Graham County opposes the designation of the Snowbird Wilderness Study Area, Joyce Kilmer Slickrock Ext 2 (Deep Creek/ A very Creek), Joyce Kilmer Slickrock Ext 3 (Yellowhammer), and Joyce Kilmer Slickrock Ext 4 as recommended for wilderness designation. While the

complete removal of these lands is subject to congressional action, the shift from study to recommended is within the jurisdiction of the Forest Service and the plan revision. The plan uses complex layers of rules over various management areas, placing restrictions on timber harvest and recreational use. The blanket corridor along the Appalachian Trail and Cherohala Skyway, rather than accounting for actual impacts of activity on both the AT and the Skyway, places unnecessary limits for use of these lands by other users that would not negatively impact either asset supposedly protected by the restrictions imposed by the blanket corridor. The plan contains reference to the need for partner support in order to effectively implement various components. While it is understood that this is a reflection of ongoing capacity limitations for the Forest Service, Graham County does not want to see the endorsement of the shifting of responsibility for upkeep of federal lands to the local governments that already face burdens as a result of the prevalence of these lands within their jurisdiction. Graham County needs assurances that the Forest Service can follow through with plans for upkeep of its property without shifting more responsibility to external entities. These concerns apply to recreational projects as well as timber harvest. We want to work together, but do not wish the status quo expectation to become that someone other than the Forest Service be responsible for their property maintenance. Graham County also has extensive experience observing that even if a use is permitted in a management area, the practicality of actual implementation of projects - from timber harvest to road building to other recreational improvements - effectively slows or eliminates projects. Delays range from lack of initiative by the Forest Service to initiate projects to a cumbersome environmental approval process. The plan does not adequately address changes the Forest Service will make to streamline these internal processes. Finally, the complexity of the forest plan revision process has been unnecessarily cumbersome. While the challenge of creating a plan that covers the vast area of two national forests and weighing the input of diverse stakeholders is understood, the ability for someone to understand the plan alternatives who did not commit most of their time for the past seven years to the process is significantly limited. This is especially applicable to the unveiling of a new alternative in January that had not previously been available for inspection. The maps provided with the plan contained too much information for someone to be able to see specific areas of impact, and shapefiles provided for GIS use were not transparent, limiting the ability to see the overlay's impact on other geographic features within each recommended management area designation. The Forest Service also has the ability to make its own GIS map viewer available on its website with all necessary layers included for easy public inspection, but instead chose to make available only PDF maps with inherent limitations while relying on everyone else to have the ability to have their own GIS system. The number of reference points needed to understand the impact of a particular designation is also unnecessarily cumbersome. The design of the revision process limited impactful public participation to those who could commit full-time staff positions to following every aspect of the plan revision over a multi-year period. This places an unnecessary burden on average citizens and organizations with limited resources.

**REQUEST FOR RELIEF**

The additional acreage in Alternative E recommended for wilderness designation in Graham County should remain in wilderness study, and congressional action should remove these areas from the study designation. Specifically, the entirety of the Snowbird Wilderness Study Area, the Joyce Kilmer Slickrock Ext 2 (Deep Creek/ A very Creek), Joyce Kilmer Slickrock Ext 3 (Yellowhammer), and Joyce Kilmer Slickrock Ext 4 should be removed from the recommended wilderness designation. The inclusion of a subjective buffer around the Appalachian Trail and Cherohala Skyway which effectively designates all of the land included as wilderness study, should be removed from the plan. Additional designations of old growth areas should be removed unless other areas are released from the designation. The plan should commit the Forest Service to the upkeep and expansion of its recreational facilities without shifting the burden to outside entities. The Forest Service should provide a realistic multi-year budget forecast for such items, and show a plan to dispose of property it cannot adequately maintain, or pay other entities for taking over responsibility for Forest Service property. The plan should include components on how to streamline the approval process for active management practices that are permitted under the plan.

Signed this 21st day of March, 2022, on behalf of: By: Connie Orr, Chair

**Resolution on the Revision of the Land Management Plan for the Nantahala and Pisgah National Forests**

**WHEREAS**, the United States Forest Service is in the process of revising the forest plan which includes identifying and evaluating lands that may be suitable for inclusion in the National Wilderness Preservation System and recommending any such lands for wilderness designation; and

**WHEREAS**, the updated inventory for lands that may be suitable for inclusion in the National Wilderness Preservation System consists of approximately 362,411 acres in Western North Carolina;

andWHEREAS, the United States Forest Service is proposing to designate an additional 15,406 acres in Cheoah District of Graham County for inclusion in the National Wilderness Preservation System; andWHEREAS, the United States Forest Service closed off access to roads in Graham County once available for public use to fit the criteria of wilderness characteristics for inclusion in the National Wilderness Preservation System; andWHEREAS, Graham County is a Tier 1 County who cannot afford for the United States Forest Service to take any more additional lands to be placed in the National Wilderness Preservation System and we firmly state that we do not want any further restrictions on our lands that inhibits potential economic growth, certain types of recreation and the potential for wildlife management.THEREFORE:The County of Graham County, North Carolina acknowledged by their individual signatures do hereby make the following resolution:1. The Graham County Board of Commissioners is opposed to the inclusion of any additional land in Graham County, NC, in the National Wilderness Preservation System as proposed by the United States Forest Service.2. Graham County respectfully requests that Congress release the following designated areas from wilderness study or designated inclusion:a. Joyce Kilmer Slickrock Ext. 2 (Deep Creek/ Avery Creek)b. Joyce Kilmer Slickrock Ext. 3 ( Yellowhammer)c. Joyce Kilmer Slickrock Ext. 4d. Snowbird Wilderness Study Area3. We futtter state that the inclusion of public and/or private lands in the National Preservation System and the regulation of that land, so as to cause a restriction of its public and/or its private enjoyment and use, is contrary to the principle of private property rights secured and protected by our Constitution.Adopted by a unanimous vote of the Graham County Board of Commissioners on August 9, 2016Keith Eller, Vice-Chairman

WHEREAS, the Graham County Board of Commissioners at its duly called special meeting on Thursday, November 12, 2015 do hereby resolve that there exists a great threat and danger yet again to the timber resources and accessibility in the County of Graham by present attempts to create further wilderness beyond the Joyce Kilmer[shy] Slickrock area in Graham County and to designate our streams/ rivers as Wild and Scenic Rivers in the Nantahala and Pisgah National Forests Wilderness Evaluation Process Plan; and,

WHEREAS, the Graham County Board of Commissioners also desire that in the inventory of a newly proposed plan under Federal Regulation by the United States Forest Service any further wilderness be excluded from the plan and that the identifying and evaluating of lands in our county that may be suitable for inclusion in the National Wilderness Preservation System be excluded and all rivers and streams be left as is; and

WHEREAS, the Graham County Board of Commissioners hereby express a desire to maintain and support our now ever decreasing timber industry due to many environmental restrictions already in place in our 68% Forest Service owned lands in our county and to retain its economical input into our county revenue and schools though limited they may be for our present and future generations to sustain our heritage; and,

WHEREAS, the Graham County Board of Commissioners believe that further expansion of wilderness areas or designations of our streams/ rivers as Wild and Scenic Rivers in Graham County would have a substantial detrimental effect on the county's economy; and

WHEREAS, the Graham County Board of Commissioners would like the record to show that they are strongly opposed to the inventory of our lands for the use of identifying criteria for further wilderness expansion and for wild and scenic rivers; and,

WHEREAS, the Graham County Board of Commissioners has sacrificed enough lands and water to wilderness use and any further expansion of the wilderness program on the forest lands and wild and scenic rivers of our county would further reduce employment, income, and school financial support in our county of which this Tier 1 County cannot survive without any longer and will resolve to put forth every reasonable means and encourage our people to support our efforts in stopping the expansion and creation of wilderness in any further areas of Graham County.

NOW, THEREFORE, BE IT RESOLVED, that the Graham County Board of Commissioners do hereby stand as

one body politic with the statement that we are strongly opposed to any additional wilderness areas or any designation of our streams/rivers as Wild and Scenic Rivers in Graham County.

Adopted this 17th day of November 2015.

Keith Eller, Chairman