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Comments: Please see the Forest Plan objection attached. Reach out to me directly with any issues.

March 22, 2022

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Attn: Objection Coordinator

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Submitted electronically via CARA Online Portal:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=43545>

Notice of Objection to the Revised Land Management Plan for the Nantahala and Pisgah National Forests

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NOTICE OF OBJECTION

Southern Appalachian Wilderness Stewards files this objection to the Revised Land Management Plan for the Nantahala and Pisgah National Forests under the process identified in 36 CFR [sect] 219 Subpart B. The Draft Record of Decision (ROD) for the Final Environmental Impact Statement (FEIS) and the Revised Land Management Plan was issued on January 21, 2022. The legal notice of the ROD, FEIS, and Revised Plan was published in the Nantahala and Pisgah National Forests newspaper of record, Asheville Citizen Times, on January 21, 2022; therefore, this objection is timely.

The Southern Appalachian Wilderness Stewards (SAWS) is a conservation non-profit dedicated to providing stewardship on wild public lands in the Southern Appalachian region, including more than 70 wildernesses in North Carolina, South Carolina, Tennessee, Georgia, Virginia, West Virginia, Arkansas, and Kentucky. Founded in 2010, SAWS was created as part of a vision of shared stewardship with the Forest Service, to serve as a peer partner to support management and stewardship work in wild places in a way that complements and strengthens agency capacity. This objection contains specific information that we commented on during the DEIS that we believe was either unaddressed in the Final Plan or improperly addressed.

We want to reaffirm that the SAWS team deeply appreciates the approach to partnership and shared stewardship that has characterized our work on the Nantahala and Pisgah National Forests for the past 10 years, and we remain committed to continuing to serve as a partner over the life of the plan. We will continue to work with the forests to support stewardship work and increase the capacity for wilderness stewardship in wilderness, inventoried roadless areas (IRAs), wilderness study areas (WSAs) and recommended wildernesses in North Carolina. In the past five years alone, SAWS had field crews working in Shining Rock, Linville Gorge, Ellicott Rock, Middle Prong, Joyce Kilmer-Slickrock, and Southern Nantahala Wildernesses as well as in Tusquittee Bald, Harper Creek, Lost Cove, Black Mountains IRA, and Snowbird WSA. SAWS will continue to pursue funding and collaboration opportunities to complement and increase agency capacity and to ensure existing wilderness and ones that are recommended by the plan are properly stewarded into the future. We object here in spirit of the partnership we have with Nantahala and Pisgah National Forests in the hopes of improving the final decision for this Forest Plan. We see the objection process as one last chance to have dialogue and come to solutions regarding key Forest Plan content.

ELIGIBILITY TO OBJECT

According to 36 CFR 219.54(c)(7), SAWS is eligible to object to the Forest Plan regarding decisions failing to recommend specific areas for wilderness management based on the submission of comments on the Draft Plan and DEIS June 29, 2020. The Final Plan was not fully responsive to our comments and appears to use some arbitrary standards in selecting recommended wilderness and furthermore may contradict existing precedent for wilderness designation.

STATEMENT OF REASONS

I. Improper dismissal of the Black Mountains as recommended wilderness.

In our comments on the DEIS, we provided information on and support for wilderness recommendation for the Black Mountains Wilderness Inventory Area (SAWS DEIS comments p.6). In the final decision, the Forest Service chose not to recommend the Black Mountains Wilderness Inventory Area for wilderness designation due to several factors quoted below:

"After lengthy discussions on the analysis and wilderness characteristics of the Black Mountains area, and effects that detract from those characteristics, the Forest Supervisor decided not to recommend the area for wilderness designation. Some of the concerns were the convex topography of the area which allows expansive visibility to surrounding private lands and multiple developments. The sights and sounds from adjacent development include residential and agricultural properties, a golf course, an air strip, an open pit gravel quarry, and vehicle noise from the Blue Ridge Parkway. The long, narrow configuration of the area also limits the core acreage where fewer impacts might be expected." Appendix E p.312

We believe the exclusion of the Black Mountain Wilderness Inventory Area based on distant sights and sounds of human occupancy does not disqualify the area from wilderness recommendation and is contradicted by many other designated wildernesses. Within the Black Mountain Wilderness Inventory Area, like many places in the Southern Appalachian Mountains, visitors may see and hear examples of human occupation and civilization in the distance. While the presence of these sights and sounds of civilization may degrade some aspects of wilderness character, there are many other unique and special aspects of the natural quality that wilderness recommendation would highlight in the Black Mountains. For example, the area boasts a unique ecosystem that is rare in the Southern Appalachian Mountains. Spruce-fir forest and high elevation rock outcrops are found above 5,500 feet and only found atop a few mountains here in the Southern Appalachians. Additionally, the Black Mountains contains a number of rare plants and animals including spreading avens, rock gnome lichen, and the Carolina northern flying squirrel just to name a few. These natural characteristics enhance the overall wilderness character of the Black Mountain Wilderness Inventory Area. We want wilderness to be a place that can protect these types of ecosystems for the survival of these unique plants and animals as well as the enjoyment and curiosity of future generations. Wilderness is not just a recreation resource, rather an amalgam of other resources and qualities. A degradation of one aspect of one quality of wilderness character should not disqualify the overwhelming benefit of having this special, unique landscape recommended for wilderness. The Black Mountain Wilderness Inventory Area offers additional "specific values of solitude, physical and mental challenge, scientific study, inspiration, and primitive recreation for the benefit of all of the American people of present and future generations" (1975 Wilderness Act).

Furthermore, many of the wildernesses we work in today are smaller and less remote than the Black Mountain Wilderness Inventory Area such as Gee Creek Wilderness in Tennessee at just over 2,000 acres in size and with a narrow configuration. Furthermore, St. Mary's Wilderness in Virginia is adjacent to an active mine and even has issues with acid mine drainage that are remediated by the Forest Service. In one extreme example, Otis Pike/Fire Island Wilderness in New York is just 1,300 acres in size, has foreground visibility of development on Long Island, and is just a few miles from New York City. We believe that the Forest Service should amend the final decision to include the Black Mountains Wilderness Inventory Area as recommended wilderness. We also believe that the Forest Service, interested stakeholders, and the public at large would benefit from the Forest Service defining or outlining the metrics used to determine varying levels of human sight and sound impact as well as defining or sharing the thresholds used to determine wilderness recommendation eligibility surrounding this impact.

II. Improper dismissal of Cantrell Top and portions of Unicoi Mountain from wilderness recommendation

In our comments on the DEIS (p.6), SAWS likewise supported the recommendation of the entirety of the Cantrell Top and Unicoi Mountains Wilderness Inventory Areas as wilderness due to their solitude or primitive and unconfined recreation opportunities, adjacency to the Upper Bald River Wilderness, and biological values. Much like the Black Mountains, these potential additions to Upper Bald River Wilderness were denied due to irrelevant factors such as their geometric shape and their proximity to features like gravel roads. We are particularly concerned that, according to the Record of Decision (p.35), more than 8,000 acres of these areas were instead allocated to the Matrix Management Area, which is a timber production management area prioritizing timber harvest and road construction over wilderness value protection. We believe the Forest Service should amend its final decision on the Forest Plan to include more of the Cantrell Top and Unicoi Mountains Wilderness Inventory Areas as recommended wilderness.

III. Improper dismissal of Tusquitee Bald from wilderness recommendation

Tusquitee Bald is the largest wilderness inventory area in Nantahala or Pisgah National Forest and an area where SAWS has done significant trail maintenance. In our DEIS comments (p.6), we supported 19,000 acres of the area for wilderness recommendation. The final plan fails to recommend the area for many of the same flawed reasons that were used to exclude the Black Mountains. Furthermore, the Forest Plan proposes to allocate over 11,000 acres of the area to the Matrix Management Area which again prioritizes timber harvest and road construction over wilderness value protection and may negatively impact wilderness character in the decades to come. Almost 3,000 acres proposed for wilderness designation in Alternative B were allocated to the Matrix Management Area. There is no rationale for the Forest Service to make such a binary land allocation when other allocations, like Backcountry, were available for the area. We believe that the Forest Service should allocate, at a minimum, the Inventoried Roadless portion of Tusquitee Bald as recommended wilderness and the remaining acres should go to Backcountry and Ecological Interest Area.

We are optimistic that an amicable resolution to these outstanding issues can be attained during the objection process. We are looking forward to continuing to work with the National Forests of North Carolina as a partner in shared stewardship over the lifetime of the plan, working together to connect people and steward wild places on the Nantahala and Pisgah National Forests. We thank you for this opportunity to voice our concerns, and we are very appreciative of all the work you have put into the Final Plan and all of its development over the years.