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Comments: Comments below focus on the potential impact of GAP actions to recreation values, to include wilderness and wild & scenic values. This includes recreation experience for all forest user groups -- including but not limited to climbing, equestrian, fishing, hiking, hunting, mountain biking, and OHV.

These comments can only be based on the AOI polygons shared by USFS in the CFLR Box folder. If other AOI's are considered for this project -- now or in future -- comments below may extend to those new AOI's.

USFS has provided AOI polygons without specifying which actions are proposed for each polygon. Absent that essential information, these comments must generally assume the most extreme actions (e.g., logging vs Rx burns). It may be that there are fewer AOI's of concern if actions for some AOI's are less impactful. USFS should engage the public again as details of specific actions are developed.

Granularity of the provided AOI boundaries is often low. There is also confusion created by the provided shapefiles as many polygons overlap others in unexplained ways. The overall effect is that for many AOI's USFS has not provided sufficient boundary detail to elicit a helpful level of detail in comments. USFS should engage the public again as details of action boundaries are developed. Partners would certainly cooperate in boundary refinement toward project success.

Generally -- although USFS has yet to identify which actions are proposed for which AOI's -- concerns for recreation values include the diminishment of the recreation experience, the decrease in desirability of an area for the various recreation uses, and the potentially reduced capacity to provide benefit to this area's critical outdoor recreation economy. While it may be that any of the actions under consideration could find application without negative impact, current ambiguity creates reason for concern in the majority of AOI's.

Because the actions within each AOI are currently unspecified, it is impossible to know the degree to which actions may present viewshed concerns. This prevents public awareness of the visual impacts of the as-yet-unspecified actions. Comments here will concentrate on impacts to recreation values for those AOI's coincident with recreation routes, pending release by USFS of sufficient information necessary for meaningful public comment on potential viewshed impacts.

Some proposed GAP actions will have the potential to increase unauthorized trail use. Actions that create -- and then inadequately decommission -- new fire lines or logging access, may result in new unauthorized trails. Actions that use currently-active unauthorized trails are likely to harden and increase use of those trails. For so long as USFS continues to condemn off-system travel while simultaneously failing to provide adequate on-system alternatives, the agency will need to consider its own hand in creating off-system infrastructure. The vast majority of active unauthorized trails use inadequately decommissioned logging roads and fire lines. Recreation partner groups should be engaged in GAP fire line and logging road planning to help mitigate inadvertent creation of additional off-system travel. There may even be instances where collaborative planning can lead to GAP actions maturing unauthorized trails toward conversion to sustainable system trails.

For Rx burn AOI's, where system trails exist there is potential concern about whether and how they would be used as fire lines. Some AOI's have clearly been drawn so as to use system trails as fire lines. Many more contain system trails that could be used to define burn blocks within the AOI. It is critical that line prep activities not present setbacks to trail maintenance. This has been seen on a neighboring Forest, with expensive damage done to system trails and no USFS support provided for repairing that damage. Ideally, line prep activities might actually help with trail maintenance, providing dual benefit. Communication and collaboration with trail

maintainers during burn block design and prep is essential. For trail partners to hear about a burn only via USFS press release would be a lost opportunity and could potentially damage partnerships.

The ideal scenario we would hope to see in GAP development and implementation is closer collaboration between the fire, timber, and recreation shops and their corresponding partners. For trail complexes with engaged recreation partners and USFS recreation personnel, it should not be difficult to examine known recreation needs and plans already under development which might dovetail with GAP actions for increased efficiency. Without that dialog, opportunities for efficiencies are likely to be lost, and management burdens increased.

On the Grandfather there are 5 AOI's closely adjoining wilderness and integral to those visitors' experience. Rx burns in these AOI's might present little problem, while logging could dramatically diminish visitor experience. These areas either:

- * adjoin wilderness and harbor much of the dispersed camping associated with wilderness visitation, or
- * are used by visitors to access the wilderness, or
- * present wilderness viewshed opportunities to frequent equestrian visitors who otherwise have no equestrian access to the wilderness itself, or
- * adjoin the wilderness and comprise a critical part of the viewshed from the wilderness area.

If logging is being considered, there may be some amount of action in and around existing wildlife openings, or hidden from the wilderness viewshed and visitor travelways, that could present opportunities.

Note that the shapefiles provided by USFS show one AOI including the southwest corner of the Linville Gorge Wilderness. As this was not shown in USFS outreach materials for this project, it is assumed that this is an error in the shapefiles. If, however, actions are proposed within the wilderness boundary despite being omitted from USFS outreach materials, the public will need to be made aware of this new development so that comments can be made.

Also on the Grandfather, there are 2 AOI's defined within wilderness study areas. These are clearly for Rx burns rather than logging, and yet care must be taken not to degrade suitability for wilderness designation. Fire lines must be natural features such as streams, or minimum impact lines such as leafblowers on ridgelines without need for digging. Any digging must be fully restored afterwards, but as there is abundant history of this being insufficiently performed, it would be far better if no digging occurred at all. Partners such as Wild South should be engaged in fire line planning if that added capacity will help reach wilderness management objectives.

Also on the Grandfather, one AOI overlaps the wild & scenic river corridor, such that any activity within the corridor must incorporate wild & scenic values.

The attached maps show:

- * GAP AOI's for which impacts to recreation values may be a concern. These are generally those AOI's known to contain significant recreation traffic. AOI's with very low recreation use are not included. AOI's with little/un-used system trails are not included. There may be areas with recreation use omitted in error from this analysis, though the general concerns of these comments apply to those areas.
- * GAP AOI's where actively-used unauthorized trails are apparently being used to define AOI borders. These illustrate the concern (above) about the hardening of active unauthorized trails, potentially without plan and with long-term consequence. Other AOI's may have this issue, and still others may use active unauthorized trails to define burn blocks within the AOI.
- * GAP AOI's where system trails are apparently being used to define AOI borders. These illustrate the concern (above) about the potential damage or benefits if system trails are used as fire lines. Other AOI's

may have this issue, and still others may use system trails to define burn blocks within the AOI.

* GAP AOI's with potential impact on wilderness or wild & scenic river values. These adjoin or lie within designated wilderness, wilderness study, and/or wild & scenic river corridor.

Map In Attachment: AOI's where recreation value and infrastructure are a concern AOI's less likely to present recreation concerns. US Forest Service (non-GAP lands)

Map In Attachment: GAP AOI's with actively-used unauthorized trails as fire lines. US Forest Service

Map In Attachment: GAP AOI's with system trails as fire lines. US Forest Service

Map In Attachment: AOI's impacting wilderness, wilderness study, and/or wild & scenic corridor. US Forest Service