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Comments: February 27, 2022

Objection Reviewing Officer

USDA Forest Service Southern Region 160 Zillicoa St., Suite A

Asheville,NC 28801

Re: Commenting on Nantahala and Pisgah NFs Plan Revision #43545

To Objection Reviewing Officer:

I am a resident of Black Mountain, N.C., and I am passionate about our natural spaces. I am a member of the Garden Club of America, the Black Mountain Beautification Committee, and a volunteer with several local organizations promoting greenways, pollinator gardens, and native plants. I am a grandmother, a gardener, a beginning bird watcher, an enthusiastic hiker, and an occasional biker.

The motto of the U.S. Forest Service is "To sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." There is no substitute for protecting existing old-growth forests, and every inch of them needs to be protected. In addition, more area needs to be designated to grow old and become old- growth. Large, older trees have been found to grow faster and absorb carbon dioxide more rapidly than younger, smaller trees. Native forests, in terms of their value as carbon storage, significantlyoutweigh their value as pulp and timber. When you add that to the value of biodiversity and water, it's pretty clear what forest policy should be. Old growth forests should not be touched, there are just too few of them left.

https://www.highlandsnews.com/local-news/final-revision-nantahala-pisgah-forest[shy] management-plan-released

https://biologicaldiversity.org/w/news/press-releases/forest-service-proposes-guadrupling[shy]timber-harvests-in-countrys-most-popular-national-forest-2022-01-21/

OLD GROWTH

"There are a handful of high priority issues, and the old growth is probably the most outstanding by consensus of the group," Hayler said. "The forest service will tell you that they have increased their old growth acreage in the network, but then you have to take the next look at it and say not all of that is old growth. If old growth is found during a project implementation phase, like a timber harvest, there is no guarantee that it will be protected. It can be cut. The very fact that the forest service, in this new plan, is still not protecting existing old growth is emblematic of the mindset of the agency that harvesting timber is their highest priority."

"...we believe that the best available science points to climate change as being an existential threat to our human race and the plants and animals that are with us. To address climate change, the best thing you can do is to protect ecosystems that sequester carbon. All of that points back to preserving old growth. So, for the forest service to claim they are using the best available science, but allow the harvesting of existing old growth on the ground, what year is this? This is ground zero on using best available science and how it should be applied to manage our public land."

Forests function as some of the planet's vital organs, often being described as the lungs of the Earth. The colonization of land by plants between 425 and 600 million years ago, and the eventual spread of forests, helped create a breathable atmosphere with the high level of oxygen we continue to enjoy today. Forests suffuse the air with water vapor, fungal spores and chemical compounds that seed clouds, cooling Earth by reflecting sunlight and providing much[shy] needed precipitation to inland areas that might otherwise dry out. Researchers estimate that, collectively, forests store somewhere between 400 and 1,200 gigatons of carbon, potentially exceeding the atmospheric pool.

Crucially, a majority of this carbon resides in forest soils, anchored by networks of symbiotic roots, fungi and microbes. Each year, the world's forests capture more than 24 percent of global carbon emissions, but deforestation - by destroying and removing trees that would otherwise continue storing carbon - can substantially diminish that effect. When a mature forest is clear-cut, the planet loses an invaluable ecosystem and one of its most effective systems of climate regulation. The razing of an old-growth forest is not just the destruction of magnificent individual trees, it is the destruction of an ecosystem.

In a thriving forest, a lush understory captures huge amounts of rainwater, and dense root networks enrich and stabilize the soil. Clear-cutting removes these living sponges and disturbs the forest floor, increasing the chances of landslides and floods, stripping the soil of nutrients and potentially releasin[middot]g stored carbon to the atmosphere. When sediment falls into nearby rivers and streams, it can kill fish and other aquatic creatures and pollute sources of drinking water. The abrupt felling of so many trees harms and evicts countless species of birds, mammals, reptiles and insects.

We need to prioritize management practices that mitigate the effects of climate change, foster biodiversity, and protect native plant communities and endangered species.

https://www.pacificforest.org/ee-old-trees-store-more-carbon-more-quickly-than-younger[shy]trees/

https://e360.yale.edu/features/why-keeping-mature-forests-intact-is-key-to-the-climate-fighthttps://www.usgs.gov/news/large-old-trees-grow-fastest-storing-more-carbonhttps://foreststewardsguild.org/old-growth/https://www.blueridgeoutdoors.com/magazine/july-2005/ancient-appalachia-the-southeasts[shy] old-growth-forests/

https:ljbiologicaldiversity.org/w/news/press-releases/missing-link-in-bidens-climate-agenda[shy]letting-older-trees-grow-2022-02-15/

https://www.climate-forests.org/post/eastern-forests-an-untapped-carbon-storage-and[shy]biodiversity-stronghold

"Our publicly owned national forests are far more valuable standing than chain-sawed down," wrote Harlan in a Jan. 21 press release. "Protecting drinking water, clean air, scenic views, iconic trails and old-growth forests will provide far more benefits than board feet of timber."

The Forest Service has failed to properly analyze 5,000 acres of the Craggy/Big Ivy section of Pisgah National Forest in its draft ROD and FEIS. As a result, it has failed to include these key conservation and recreation areas

in its Forest Scenic Area designation. Instead, it has placed these areas-which include old-growth forests, popular recreation trails, panoramic vistas, and municipal drinking water sources-in its highest priority logging designations.

The Forest Service has also failed to fully consider and analyze the proposed Craggy National Scenic Area. Accordingly, the Forest Service must amend its plans to include 5,000 acres of Snowball Mountain, North Fork, Shope Creek, and Ox Creek in its Forest Scenic Area and fully consider recommending the proposed Craggy National Scenic Area.

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-nearly half of all comments submitted on the Nantahala Pisgah Forest Plan-supported the complete Craggy National Scenic Area.

The Buncombe County Commission also passed two unanimous bipartisan resolutions in 216 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.

The Nantahala Pisgah Forest Partnership-a coalition of over 3Odiverse organizations, including the forest products industry, hunting organizations, and recreation groups-have endorsed the entire Craggy National Scenic Area as their top priority consensus recommendation.

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[shy] 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 (including the timber industry and hunting organizations), and the public, the FEIS and ROD places over 5,000 acres of Craggy's most important conservation and recreation areas in the Matrix Management Area.

I obiect to the Forest Plan for the above reasons. and I am also interested in joining an objection to the plan as an interested party.

Placing 5.000 acres of Cragy's most important recreation and conservation areas in MatrixManagementAreadisregardstheunanimousandoverwhelming localandcommunitysupport, support from stakeholders. and support from business and local leadership.

The plan fails to consider these important attributes of the areas it has place in high priority logging areas:

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.

2. 1,500 acres of old-growth forests. (See opening statements) Dr. Alan Smith, emeritus professor of biology at Mars Hill University, has inventoried over 1,500 acres of old-growth in the Snowball and North Fork sections of Big Ivy.

ENDANGERED SPECIES

(https://www.fs.usda.gov/Internet/FSE_DOCUM ENTS/stelprd 3797968.pdf):

1. 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.

The bog turtle has also been listed as a concern: https://defenders.org/sites/default/files/2022-01/Petition%20to%20ReclassifyList%20the%20Southern%20Population%20of%20the%20Bog

%20Turtle%20%28Glyptemys%20muhlenbergii%29%20as%20Endangered%20or%20Threatened%20Under%20the%20Endangered%20Species%20Act Submitted%20by%20Defenders%20of0/o 20Wildlife%20%28Jan.%2027%2C%202Q_22%29.Qdf

Birds: Audubon Society cites concern for the status of birds such as the Veery, Broad-winged Hawk, Peregrine Falcon and Blackburnian Warbler. See their comments on the plan (https://nc.audubon.org/news/speak-birds-nantahala-pisgah-forest-plan):

Old Growth Forest: The Nantahala and Pisgah forests include old growth forest as well as areas that will be old growth in the future. These forests are rare across the landscape and provide critical habitat for birds that thrive in dense interior forests, species like Veery, Broad-winged Hawk, and Blackburnian Warbler. Not all of these places are currently protected from active management that degrades their old growth condition, such as timber harvesting.

Recommendation:

* Existing old growth forests should be protected in designated old growth networks.
* Places that are projected to become old growth forest in the future-backcountry areas and conservation lands like Mountain Treasure Areas, for example-should be added to designated old growth networks as well.

State Natural Areas: The North Carolina Natural Heritage Program has identified habitats across the forests that hold our state's best examples of unique ecosystems, biodiversity hotspots, and rare plant and animal communities. Recommendation:

* Timber production shouldn't be permitted in these designated natural areas.
* These designated natural areas should be managed only to maintain their rare or exemplary ecological values.

Unroaded Areas, or Wilderness Inventory Areas: Wilderness Inventory Areas are some of the wildest and most remote places within the Nantahala and Pisgah forests. One of the defining characteristics of these places is that they have very few roads, or none at all. But many of these places could still see active management, such as timber harvesting.

These unprotected wild places represent our best opportunity to maintain large, intact forests in perpetuity,

places where natural processes help ensure birds like Ovenbird and Blue-headed Vireo survive and thrive long into the future. This is especially important in the face of habitat fragmentation and forest loss on private lands in the region. Recommendation:

* All Wilderness Inventory Areas should be managed to maintain or restore their wildland values and should be off limits for construction of utilities, highways, and energy development.

Congressional Designation: There's no stronger land protection classification in the U.S. than official Wilderness designation. For rivers, the equivalent designation is Wild and Scenic. The protections of Wilderness Areas and Wild and Scenic Rivers allow natural processes to take place on the landscape and protect the birds that depend on them.

In the face of the many pressures on our forests, Audubon and our partners are advocating for Wilderness and Wild and Scenic designation for the landscapes and rivers listed below. All told, these recommendations, along with existing Wilderness Areas, only account for about 175,000 acres of the total forest, or 17 percent of Forest Service land. Recommendation:

* The following areas should be recommended for Wilderness or National Scenic Area designation: Craggy/Big Ivy (Wilderness and National Scenic Area), Overflow, Black Mountains, Mackey Mountain, Joyce Kilmer Extensions (excluding Yellowhammer), Southern Nantahala Extensions, Ellicott Rock Extension, Shining Rock Extensions, Harper Creek, Lost Cove, Snowbird, Tusquitee, Unicoi & Cantrell Top, and Middle Prong Extension.
* The following rivers should be included as Eligible Wild and Scenic Rivers: North Fork of the French Broad, Panthertown Creek, Greenland Creek, the East Fork of the Tuckasegee, the East and West Forks of Overflow Creek, and nine additional miles of Fires Creek. In addition, Big Laurel Creek and the West Fork of the Pigeon should be reclassified as "scenic" rather than "recreational" streams, and Overflow Creek, Thompson River, and Whitewater River should be reclassified as "wild" rather than "scenic."

Recreation and Trails: North Carolina's national forests have enough space to support all kinds of people and activities, from bird watching to mountain biking. As population growth continues to expand in areas around our forests, these public lan s have only become more important and popular for recreation.

This can put pressure on birds and the places they need, but it also presents new opportunities and constituents for conservation. Our recommendation:

* The natural setting and biodiversity of the forests will always be the biggest draw for visitors and should be protected to the greatest degree possible.
* The plan should continue to support conservation and protection of Peregrine Falcons through monitoring, seasonal closure of select rock faces, and collaboration with the climbing and outdoor recreation community.

Ecological Restoration: Ecological restoration can help breathe new life into degraded sections of the forest. Restoration work can help improve biodiversity, water quality, and resilience to climate change. Our recommendation:

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* Include Ecological Interest Areas in the plan. These are areas of high ecological value identified as potentially benefiting from restoration work.
* Include a list of specific priorities for ecological restoration and ensure that they are actually included in projects

when opportunities are present.

Climate Change: As Audubon's 2019 Survival by Degrees Report shows, climate change and the immediate threats associated with those changes (extreme rain events, spring heat, etc.) pose an existential threat to birds.

The large, intact forests of western North Carolina create a natural system more resilient to these threats, and management and restoration should protect that function rather than degrade it. Our recommendation:

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* The plan must require that all infrastructure (e.g. stream crossings and culverts) be designed and maintained to accommodate increased storm intensity and frequency.
* The Forest Service should monitor how phenomena like droughts and fires affect the forest and commit to mitigating their impacts if we begin to see more impacts from these threats.
* New or reconstructed stream crossings under roads must provide passage for fish and other aquatic organisms.
* Unroaded areas should be protected to provide intact, connected forests.
* The Forest Service should provide a full accounting of the Nantahala and Pisgah National Forests' role in sequestering and storing carbon.

Arthropods, including the endangered spruce-fir moss spider and the noonday globe (https://www.fs.usda.gov/Internet/FSE DOCUMENTS/stelprd3793079.pdf)

(https://www.mdpi.com/1999-4907/8/4/97/htm):

Although efforts to protect increasingly isolated remnants of old-growth forest typically focus on endangered plants and vertebrates, arthropods are equally important to the functioning of forest ecosystems and are vulnerable to extinction through loss of old-growth forests. In fact, the value of old-growth forests may lie primarily in their diversity of native species that provide population sources for colonization and ecological functions in regenerating forests. In particular, the diversity of plant species, predaceous arthropods, and insectivorous vertebrates in old-growth forests help maintain lower abundances of herbivores than often occur in younger, managed, forests. Arthropod diversity generally increases with forest age, time since prior disturbance, and the remaining area of forest. Remnant old-growth forests are particularly rich in arthropod biodiversity. The number of arthropod species known to be associated with old-growth forests is likely to grow over time as more data become available, given the high diversity of plant species and habitats in these forests. Old-growth arthropods often have limited mobility, and many are flightless, making them vulnerable to forest fragmentation.

Furthermore, populations of arthropods typically are more stable in old-growth forests than in younger forests. Many species are particularly important in maintaining ecological processes that sustain forest production and ecosystem services. Forest canopies provide a wide variety of temperature and moisture conditions, as well as structurally-complex branching patterns, multi-layered canopy structure, and chemically-distinct foliage qualities of diverse tree species, and may host half of the world's species. Old-growth forests, in particular, typically provide the richest diversity of plant species, habitats, and vertical and horizontal gradients in temperature, moisture, and soil type that, in turn, support the richest diversity of associated herbivores, detritivores, and their predators and parasites, compared to younger forests. By contrast, younger, managed forests typically are composed of only one or a few commercially-valuable tree species. Typically, arthropod communities in old-growth forest canopies can be distinguished from those in younger forests by their greater diversity and by their relatively higher proportions of folivores (e.g., caterpillars, tree crickets, and leaf beetles), arboreal detritivores and fungivores (Collembola and oribatid mites), and predators (e.g., predaceous beetles, true bugs (Hemiptera), and spiders), compared to sap-suckers (e.g., scale insects, aphids, aleyrodids, leafhoppers, and treehoppers

(Hemiptera)) and ants, which are more abundant in younger forests. For sources, citations and a full discussion, please see: https:ljwww.mdpi.com/1999-4907/8/ 4/97/htm.

1. 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 SO-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.

VIEWSHED

Most users' enjoyment of trails hinges on the natural surroundings of the trails. Natural settings and biodiversity of the forests will always be the biggest draw for visitors and should be protected to the greatest degree possible. Viewsheds for trails within the Nantahala and Pisgah National Forests should not be logged.

1. The Snowball Trail-one of themost 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.
2. 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, where it 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.
3. Shope Creek contains old-growth forest and growing recreation use. Shope Creek shelters around 300 acres of old growth forest, some of the last old0growth forest in Buncombe County and the closest to the city of Asheville. Shope Creek is the closest section of national forest to Asheville. Protecting Shope Creek for its recreation and conservation values is the highest priority for this section of forest.
4. Ox Creek shares a boundary with the Town of Woodfin Watershed. When logging was proposed previously in this watershed, massive public outcry resulted in permanently protecting this watershed from logging in 2005. Logging adjacent to a permanently protected water supply for a rapidly growing municipality would threaten water quality and raise concerns for the communities it serves.
5. Ox Creek contains a portion of the Mountains to Sea Trail. This 1,175-mile footpath from Clingmans Dome to Jockey's Ridge. 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.
6. The Forest Service also failed to study the Craggy National Scenic Area proposal, the most popular and publicly supported portion of the entire Nantahala Pisgah Forest Plan. Despite a 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 over 5,000 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 Forest Service must amend the plan to The Forest Service failed to properly evaluate approximately 5,000

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 5,000 acres of Snowball Mountain, North Fork, Shope Creek, and Ox Creek in its Forest Scenic Area.

Respectfully submitted,

Cynthia Simonds

My previous comments on this issue were submitted May10,2020: