

UNITED STATES OF AMERICA
DEPARTMENT OF
AGRICULTURE
UNITED STATES FOREST
SERVICE

March 11, 2021

Objection to the Revised Nantahala and Pisgah
Forest Plan Final Environmental Impact Statement
and Draft Record of Decision:

**NOTICE OF OBJECTION AND STATEMENT OF
REASONS**

Submitted via electronic portal:

Nantahala and Pisgah National Forests Plan Revision Objection

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Forest Supervisor
United States Forest Service
ATTN: Objection Coordinator
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Asheville, NC 28801

cc: Randy Moore, Forest Service Chief, U.S. Forest Service,

1400 Independence Avenue, SW, Washington, D.C., 20250-0003

NOTICE OF OBJECTION

Pursuant to 36 C.F.R. § 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 Officials are James Melonas, Forest Supervisor, and Ken Arney, Regional Forester. The Nantahala and Pisgah Revised Forest Plan Final Environmental Impact Statement and Draft Record of Decision were filed on January 21, 2022, with public notice appearing in the *Asheville Citizen Times*, initiating a 60-day objection period. This objection is timely.

OBJECTION ELIGIBILITY

The objector has submitted previous substantive formal comments during public comment periods for the Nantahala and Pisgah Forest Plan. The previous comments were within the scope of the proposed plan, specific to the plan, and had a direct relationship to the plan.

Previous comments included detailed and substantive comments describing the unique conservation attributes of the Craggy/Big Ivy section of Pisgah National Forest. These attributes were not included in previous analyses by the U.S. Forest Service, nor were they included in the draft ROD or Final EIS. Additionally, the Forest Service chose not to even study the Craggy National Scenic Area proposal recommended by the Buncombe County Commission and offered no explanation for this decision.

In addition, the Forest Service has presented new information in the final EIS and draft ROD with the introduction of Alternative E and the introduction of a new Forest Scenic Area management area. As indicated in 36 CFR 219.53, objectors who have not filed previous comments can still object when “the objection concerns a new issue that arose after the opportunities for formal

comment.” The U.S. Forest Service publicly [confirmed](#) at the Buncombe County Commissioners Briefing on February 15 that this new Alternative was new information that enabled other entities to object. These comments directly address Alternative E and the Forest Scenic Area additions. If necessary, the objector is willing to consolidate this objection under one of the lead objectors for I Heart Pisgah coalition or its partners.

OBJECTION

I object to the revised land management plan and final environmental impact statement, because it increases logging in conservation priority areas, historically significant and scenic destinations, ecologically sensitive areas, steep land, and the plan fails to protect key locations that remain intact old-growth.

I object to the exclusion of Coxcomb Mountain, Snowball Mountain, and Shope Creek from the proposed Craggy Mountain Wilderness and National Scenic Area, which is currently selected as highest priority for logging. I support the designation of this area to be included in the National Scenic protected area. As mentioned in my stated in my prior substantive formal comments, "In the final plan, I ask the Forest Service to expand its wilderness recommendations to 8,693 acres as endorsed by the Nantahala-Pisgah Forest Partnership in its 2017 final recommendations to the Forest Service. I also ask that the special interest area acreage include the entire 16,000-acre Craggy-Big Ivy Forest, including Coxcomb Mountain, Snowball Mountain, and Shope Creek." (Attachment A)

I object that the plan fails to protect popular scenic destinations, historically significant areas, and high priority conservation areas, by allowing logging in these areas.

I object that the plan fails to robustly identify old growth patches and removes protection from old growth patches.

I object that the plan fails to protect steep slopes and ephemeral streams.

I object that the buffer width is insufficient to protect riparian areas, in stream habitat, and downstream communities from the degrading impacts of logging.

The reasons for my objections are as follows:

I'm concerned that logging in steep, biologically diverse and mature/old growth forested areas will have long term impacts not just within the areas proposed for logging, but also will create impacts in the surrounding forests proposed for National Scenic Area protection. Specifically, erosion from the construction of roads, culverts, application of herbicides, removal of canopy cover, introduction of invasive species, removal of large standing woody debris (which would otherwise serve as critical habitat for endangered species and acts a carbon sink), removal of old growth, instability of soil on steep slopes, increased noise and traffic, and other disturbances to threatened and endangered species and their habitat. These impacts will certainly affect the ecosystem and community beyond the boundaries of the high priority logging areas. There will be **significant cumulative impacts and indirect impacts** that reach far beyond the areas proposed for logging. These significant cumulative and indirect impacts will affect downstream communities, adjacent protected forested areas, and will impact water quality and habitat in watersheds designated as the drinking water sources for Weaverville and Woodfin.

I'm concerned about the impacts to water quality from the construction of roads and culverts, and from the logging. This watershed is revered for its water clarity, and remarkable in stream habitat. I'm concerned that constructing roads and culverts in areas with high slopes will result in increased sedimentation and turbidity in high quality biologically supporting waters.

I'm concerned about the impacts to water quality and stream stability in areas proposed for highest priority logging. Removing canopy cover increases the flashiness of the stream hydrograph, and will significantly alter the flow regime on a long-term basis, creating stream instability, which will destroy instream habitat and harm aquatic ecosystems. The buffer widths proposed do not adequately protect streams at high slopes. Increased runoff and sediment will degrade instream habitat downstream.

I'm concerned that logging in the Ivy River watershed will result in increased risk of catastrophic flooding downstream, and will degrade streambanks with more powerful peakflows in stream-side communities in the Ivy River watershed. Logging will increase the likelihood of property damage for downstream neighbors during storms.

I'm concerned that logging in areas with steep slopes will make the area more prone to landslides during major storm events.

I'm concerned that the disturbance of soil will create a highway for invasion by noxious invasive species, which could impact the proposed National Scenic Area if adjacent forests are logged. This will result in increased application of herbicides which can impact non-targeted sensitive species such as amphibians and nearby vegetation. These cumulative impacts to the surrounding protected areas are not fully evaluated in the plan.

I'm concerned that roads and access by heavy equipment will bring increased noise and pollution, which will also impact sensitive species and degrade habitat, and will degrade the use of the surrounding scenic areas.

I'm concerned that logging in this area will impact threatened and endangered species, and rare sensitive species, which is not fully addressed in the plan.

I support robust identification and protection of old-growth patches and areas with significant ecological and cultural significance.

I'm concerned about impacts in important archaeologically significant and historic places included in this plan. Such large scale disturbances need careful evaluation of the historical significance to underserved communities, and indigenous people. More archaeological studies and consultation is needed.

I object to desecration of sacred lands which were unfairly ceded during The Indian Removal Act of 1830, Initiating the trail of tears. Both the Eastern Band of Cherokee and the Cherokee Nation should be formally consulted to ensure this plan does not desecrate important cultural resources.

I support modifying the plan to remove the area of Coxcomb, Snowball, and Shope Creek from the designation of the Matrix Management area, and removing it from priority logging status, and protecting it as a part of the National Scenic Area.

I support the following specific changes to the revised land management plan for the Nantahala and Pisgah National Forest:

1. Protect all 101,000 acres of the most important conservation area, including the I Heart Pisgah Key Conservation Areas and Mountain Treasures.

2. Protect all remaining old-growth forests.
3. Prohibit logging on steep slopes. Prohibit logging in the Appalachian Trail viewshed and other major trail corridors. Prohibit logging within 100 feet of all waterways, including ephemeral streams.
4. Protect ALL of Craggy as a National Scenic Area.
5. Fully evaluate climate and carbon storage benefits of intact, mature forests in all management decisions.
6. Include full and robust protections for ephemeral streams.
7. Protect all of the State Natural Heritage Areas.
8. Include species-specific plans and robust, enforceable protections for their habitat.
9. Fix the model inputs to accurately reflect old growth forests and natural disturbance.
10. Include more youth and diverse voices in forest decision making for the next 30 years.

This was stated in my prior formal comments, that the plan does not prioritize recreation, clean water, scenic views, rare species, old-growth forests, and more protected areas. The USFS has an opportunity to ensure the protection of critically imperiled and unique lands, and maintain a legacy of stewardship for our nation's greatest treasures. Responsible forestry and the sustainable harvesting of forest products is possible without risking degradation of important cultural resources and old-growth intact forests.

Thank you for implementing the public participation of this plan, and thoughtfully incorporating our comments into the USFS plan to model this opportunity for stewardship.

Sincerely,

Alea Tuttle

Attachment A: Original Comment Letter

Date submitted (UTC-11): 6/6/2020 2:44:31 AM

First name: Alea

Last name: Tuttle

Organization: Save Ivy River

Title:

Comments:

Dear Forest Supervisor Allen Nicholas and Planning Team Leader Michelle Aldridge,

I support the complete 16,000-acre Craggy Mountain Wilderness and National Scenic Area. The entire Craggy Big Ivy section of Pisgah National Forest should be permanently protected as an 8,693-acre Wilderness and 16,000-acre National Scenic Area.

The Craggy-Big Ivy section of Pisgah National Forest is home to the wildest and most important recreation and conservation lands in the East. It shelters over 4,000 acres of old-growth and at least 44 rare and endangered species. Craggy-Big Ivy is also home to waterfalls and world-class recreation-and it's located only 15 miles from downtown Asheville.

The complete 8,693-acre Craggy-Big Ivy Wilderness and 16,000-acre Craggy National Scenic Area have unanimous bipartisan support from the Buncombe County Commissioners and the City of Asheville. The complete Wilderness also is endorsed by the Nantahala-Pisgah Forest Partnership. In addition, the complete Craggy Mountain Wilderness and National Scenic Area are supported by a broad and diverse coalition of over 100 organizations, dozens of Buncombe County businesses, and thousands of local supporters.

The complete Craggy Mountain Wilderness and National Scenic Area will permanently protect the panoramic viewsheds from Craggy Gardens, the most popular and most photographed spot along the entire Blue Ridge Parkway. It also will protect one of the largest old-growth forests in the East and iconic trails like the Mountains to Sea Trail. Its pristine headwaters are home to native trout and part of the protected watershed of the Ivy River, an important tributary of the French Broad and the drinking water source for the cities of Weaverville and Mars Hill.

Craggy has globally significant botanical, zoological, geologic, scenic, and recreational resources that are currently underrepresented across the Pisgah-Nantahala National Forest. The Craggy Mountain Wilderness and National Scenic Area offers some of the best opportunities for primitive recreation and

solitude in Pisgah National Forest, with rugged, remote peaks surrounded by 100,000 acres of contiguous wildlands.

The North Carolina Natural Heritage Program has identified over 3,000 acres of the Craggy Mountain Wilderness and National Scenic Area for highest priority protection, and it has been highlighted by The Nature Conservancy as one of the most important core forests in the Southern Blue Ridge.

Already, the Forest Service has received more comments supporting permanent protections for Craggy than any other area in the Pisgah-Nantahala National Forest. I applaud the Forest Service for recognizing the rare and special natural heritage of the Craggy-Big Ivy Forest and for including stronger protections for this area in all of its alternatives. In the final plan, I ask the Forest Service to expand its wilderness recommendations to 8,693 acres as endorsed by the Nantahala-Pisgah Forest Partnership in its 2017 final recommendations to the Forest Service. I also ask that the special interest area acreage include the entire 16,000-acre Craggy-Big Ivy Forest, including Coxcomb Mountain, Snowball Mountain, and Shope Creek.

More protected areas: I support significantly more protected areas in the Pisgah-Nantahala National Forest. The draft plan proposes substantially increasing the amount of logging in the Pisgah-Nantahala National Forest. The plan should also significantly expand the amount of protected areas. All of the following places should be protected in either wilderness, national scenic areas, national recreation areas, or special/ecological interest areas:

All 16,000 acres of Craggy-Big Ivy- including Coxcomb Mountain, Snowball Mountain, and Shope Creek; Black Mountains; Bald Mountains; Bluff Mountain; South Mills River; Unicoi Mountains; Santeetlah Creek; Heartbreak Ridge; Jarrett Creek; Mackey Mountain; Woods Mountain; Daniel Ridge; Cedar Rock; Terrapin Mountain; Tusquitee Bald; Laurel Mountain; Tellico Bald; Cheoah Bald; Chunky Gal Mountain; Boteler Peak; Terrapin Mountain; Pigeon River Gorge; Fishhawk Mountain; Chattooga Headwaters; Wesser Bald; Siler Bald; Piercy Mountains; Snowbird Creek; and Panthertown Valley.

The draft plan proposes to open 50 - 61% of the forest to logging, and it plans to increase timber harvests annually by up to 400%. There should be a

commensurate increase in protected areas, which provide for the highest quality recreation, scenery, water quality, and user experience.

According to the Pisgah-Nantahala National Forest's Visitor Use Study of 2014, over 90 percent of the nearly 7 million visitors to Pisgah-Nantahala National Forest are hikers, bikers, runners, paddlers, climbers, anglers, naturalists, and nature-seeking outdoor enthusiasts. The Pisgah-Nantahala-one of the country's most visited national forest-needs more protected areas for recreation and conservation. At least half of the forest should be protected as national recreation areas, national scenic areas, wilderness, special/ecological interest areas, or part of the old-growth network.

Stronger protections for trails: Trail corridors for iconic footpaths, including the Appalachian Trail, Mountains to Sea Trail, Art Loeb Trail, Bartram Trail, and Benton Mackaye Trail, need stronger protections, especially for viewsheds, watersheds, and trail experience. All of the Pisgah-Nantahala's major recreational trails and trail networks should be protected from timber harvests.

More old-growth forests: The forest plan also needs to significantly expand the amount of protected old-growth forest. The old-growth acreage across all alternatives in the plan falls well short of NRV goals. To meet plan requirements for desired future conditions, the old-growth network should be expanded by at least 200,000 acres.

Protect all 16,000 acres of Craggy: Thank you for including stronger protections for the Craggy-Big Ivy area across all of your proposed alternatives. In the final plan, include all 16,000 acres of the Craggy-Big Ivy area as a national scenic area or special/ecological interest area, including Coxcomb Mountain, Snowball Mountain, and Shope Creek. Expand the Craggy Wilderness Area to 8,693 acres as recommended by the Nantahala Pisgah Forest Partnership, over 120 organizations, thousands of supporters, and unanimous bipartisan resolutions from Asheville City Council and the Buncombe County Commissioners.

Strengthen water quality standards: The plan should strengthen protections for water quality, especially in areas potentially affected by logging. The plan currently only recommends the current 15 foot buffer. A 50-foot buffer is needed.

Protect steep slopes from logging: The plan should not roll back standards and requirements for logging on steep slopes. The plan should restore and strengthen protections for steep slopes. Non-aerial logging on steep slopes above 40% should never be permitted.

Protect Wild and Scenic Rivers: I wholeheartedly support the 19 additional rivers recommended for inclusion in the Wild & Scenic River system. Thank you for protecting these rivers and responding to public support for these protections.

Grow our region's economy: Nearly 7 million people visit the Pisgah-Nantahala National Forest each year, making it the second-most visited national forest in the country. Visitation will continue to increase substantially over the next three decades. Recreation and tourism are the backbone of our region's economy. Protecting more of the forest's scenic views, clean water, rare species, trail networks, and wild places should be prioritized over increased timber harvests. In the 21st century, the Pisgah-Nantahala National Forest is far more valuable standing than cut down.

Stronger protections for rare species: The final plan should include stronger standards for protecting 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.

Reduce the impact of climate change: Protecting more intact forests provides carbon sequestration and mitigates the effects of climate change. Protecting more of our 1.1-million-acre national forest is one of the most important and effective ways that our region can address climate change in the next 30 years.

Prioritize recreation and conservation: The Forest Service's mission was defined by its first chief Gifford Pinchot, who wrote: "When conflicting interests must be reconciled, the question that shall always be answered from the standpoint of the greatest good for the greatest number in the long run."

In the Pisgah-Nantahala, recreation and conservation provide the greatest good to the greatest number in the long run. In the final plan, they should be the prioritized management focus areas for the next three decades. Please manage the forest for the vast and overwhelming majority of its users. In the final plan,

prioritize recreation, clean water, scenic views, rare species, old-growth forests, and more protected areas.

Thank you for the opportunity to comment.