USFS

Nantahala-Pisgah National Forest Plan Objection

The most recent Plan proposal gives way too much to the logging industry and USFS timber harvest targets; and does NOT adequately protect and preserve critical natural resources. I am not against logging per se - clearly I use paper towels and wood products like everyone. But the Pisgah-Nantahala Forest Plan shouldn’t double and potentially quadruple logging while weakening protections for the country’s most popular national forests.

This Plan needs to be revised because it is the right thing to do. It should further strengthen protections for old growth and watersheds, create real connected wilderness networks to preserve flora and fauna diversity while buffering against climate change, and should not primarily serve to hit targets for timber harvest under the guise of over-inflated targets for early successional compartments. The current "compromise" Plan is not reflective of the broader public input, or of balanced public uses, or of the best science regarding sustainable management of our public natural resources.

**Objections:**

**The Revised Forest Plan Allows Cutting Old Growth Forests**

The revised plan does not protect our rare existing old growth stands, nor new stands yet to be inventoried within the landscape. Rather, this decision is left to the local district ranger. Recent projects, such as the Southside Project, offer no assurance that district rangers will withdraw newly discovered old growth stands from timber harvesting projects. The revised forest plan *should not* allow district rangers the discretion to cut old growth forests. Current USFS inventory data on old growth is incomplete, often sparse, and many stands are accidentally captured in logging tracts due to data ignorance.

The “Old-Growth Network” Proposed by the Forest Service looks like a red herring since much of the newly designed “old growth network” consists of trees that are, in reality, not old growth at all. In fact, about 110,000 acres (42%) of the 265,000 acre “old growth network” are younger or middle-aged forest stands. It feels like this “old growth network” is called that to make the public *think* that existing old growth is being protected, but that clearly is not the case. The Forest Service has removed protections from patches of rare, existing old growth forest and has included these thousands of acres of old growth in the highest priority logging designations.

Management will play a crucial role in restoring and protecting critical habitats for threatened, endangered and sensitive species; and especially for old growth forests, which have dwindled now to less than ½ of 1% of their original existence.

Remedy: The Forest Service should prioritize inventorying national forest lands to locate *all* stands that qualify as existing old growth, based on the Forest Service’s own *Region 8 Old-Growth Guidance*. The USFS acknowledges that current inventory data of old growth is incomplete. The Forest Service should automatically protect ALL of these rare forest stands known to exist, adding them all to a true preserved “old growth network”. Do not give local district rangers the discretion to cut existing old growth. Further, all newly discovered forest stands that exhibit significant old growth or near-old-growth characteristics should be considered as candidates for old-growth restoration, and added to the old-growth network as merited. There is strong scientific evidence regarding the importance of old growth for species diversification as well as for buffering of climate change impacts.

**The Revised Forest Plan Excessively Prioritizes Crop Tree Management**

The “desired future condition” of the forest, as described in the Revised Forest Plan, is heavily weighted towards crop tree management – timber harvest targets from the Dept of Agriculture, which is heavily lobbied by timber interests. Tellingly, the revised forest plan calls for creating “young forests” as its top priority. Over 60% of the entire Nantahala-Pisgah National Forest is open for logging, that includes post-harvest treatments using herbicides, burning and other actions geared to produce only certain species of trees for future harvesting. It is inappropriate and excessive that this Plan proposes at least doubling and potentially quadrupling the total timber harvest from the Nantahala-Pisgah region, given the topography and fragile ecosystems involved.

This Plan is out of balance and favors commodity extraction through intensive timber harvesting over other protective land management designations as in wilderness and backcountry areas, NC natural heritage natural areas, and wild & scenic river corridors. This plan needs to better balance preserving biodiversity and creating healthy native forest ecosystems against extraction management. For example, the Revised Forest Plan targets 54,000 acres of NC Natural Heritage Natural Areas for timber harvesting—lands with rare and exemplary habitats that are some of the most biologically diverse areas of the forest, and irreplaceable for the next 100+ years.

As another example, in its draft record of decision and final environmental impact statement, the Forest Service fails to properly analyze 4,000 acres of the Craggy and Big Ivy sections, which contain old-growth forests, popular recreation trails, panoramic vistas and municipal drinking-water sources. Instead of including these key conservation and recreation areas in its Forest Scenic Area designation, the agency has placed them in its highest-priority logging designations which is inappropriate.

I am also concerned that the modeling used for the Plan does not adequately account for the role of natural disturbances, particularly where this may lead to an over-estimation of the need for man-made early successional forest. The natural processes of sustainability in the plan area are heavily dependent on the occurrence of high rainfall, steep slopes, soils that are often highly erodible, temperate climate, prevailing subtropical winds, the absence of previous glaciation and the presence of pockets of glacial period refugia, resulting in one of the most highly diverse ecosystems on Earth. Here, natural disturbance, including windfall, ice storms and wildfire on dry ridges, frequently results in canopy gaps of between ¼ to ½ acre or more, and creates a changing dynamic of all stages of succession within an uneven age forest, from early successional habitats through old growth stages. I am concerned that these natural disturbances may not be adequately accounted for in the modeling that has guided decisions regarding recommended timber harvest and targets for early successional stands.

Remedy: 1) The Revised Forest Plan should establish clear standards and guidelines in all management areas of the national forest to maintain and restore native forests and their full complement of natural and physical resources such as clean water, biological diversity, rich soils, etc. 2) Special areas should be removed from the timber base, including known existing old growth, NC natural heritage natural areas, and unroaded areas possessing remote character, and high ecological integrity and biodiversity values. Protect all 101,000 acres of the most important recreation and wilderness conservation areas, including the entire Craggy National Scenic Area. 3) Prohibit logging on steep slopes, in the Appalachian Trail viewshed and other major trail corridors and viewsheds, and within 100 feet of all waterways, including ephemeral streams. 4) More accurately account for natural disturbance that occurs in mature and old growth forests in modeling and decision making to avoid inflated projections for man-made early stage forest targets.

**The Revised Forest Plan Fails to Recommend Any Qualified Wilderness Areas in the Chattooga River Watershed**

The Chattooga watershed is qualified for potential wilderness area designation. These areas include the Overflow Wilderness Study Area, Ellicott Rock Wilderness Area West Extension and Terrapin Mountain. These areas are clustered in close proximity and comprise a portion of the extraordinary biological diversity of the Chattooga headwaters area, include popular recreational areas, and are critical for the resiliency and overall ecological health of the Chattooga River watershed.

A few supporting facts are: 1) The Overflow Wilderness Study Area is large enough to qualify as a potential wilderness area, because Overflow’s 3,900 acre potential wilderness area in NC, combined with a contiguous 2,700 acres of primitive backcountry in GA, altogether comprise a 6,600 acre potential wilderness area. Obviously, state lines do not determine the boundaries of wilderness areas, as shown by the Ellicott Rock Wilderness Area. 2) The 824 acre Ellicott Rock Wilderness Area West Extension is contiguous with and so will add resiliency to the existing Ellicott Rock Wilderness Area, to help protect and augment its existing wilderness characteristics and features. 3) Terrapin Mountain’s 5,441 acres of rugged landscapes, steep slopes and rare habitats, combined with its contiguity with the Chattooga Wild & Scenic River Corridor, support its protection as a potential wilderness area.

In this Revised Forest Plan for the entire Nantahala-Pisgah National Forest, over 100,000 acres of potential wilderness areas have been denied this needed recognition and protection. Since these special areas are not recognized and recommended in the Revised Forest Plan, those lands will be subject to actions that will consequently disqualify these areas for future protective designations. The USFS must protect the increasingly rare wild areas in the Chattooga headwaters and in the greater Nantahala-Pisgah National Forest to preserve critical water supplies, wilderness recreational opportunities, and basic public health.

Remedy: Add wilderness area designations for the Overflow Wilderness Study Area, Ellicott Rock Wilderness Area West Extension and Terrapin Mountain. They all have outstanding, unique characteristics and features that make them suitable as potential wilderness areas.

**The Revised Plan Fails to Recommend and Adequately Protect Qualified Wild & Scenic Rivers**

Regarding the Whitewater and Thompson Rivers, although the Revised Forest Plan did recommend these rivers as candidates for as wild & scenic river designation, these outstanding rivers received a downgraded classification as “scenic” rather than “wild.” In reality, these two rivers flow through some of the most remote and wild areas in the Blue Ridge Escarpment, and are deserving of “wild” management directives and protection for most of their linear miles. In addition, the Plan disregards Overflow Creek as eligible for wild & scenic river designation, based on the unfounded opinion that it supposedly was not scenic enough and did not actually possess remarkable values. This is an arbitrary and capricious view that seems inappropriate given that Overflow Creek has numerous scenic remote waterfalls and outstanding scenic values, and sits very near some of the oldest forests in the entire Chattooga River watershed.

Remedy: Recommend both the Whitewater and Thompson Rivers be upgraded from “scenic” designation, and recommended as qualified for “wild” river designation. Recognize and recommend that Overflow Creek is eligible for wild & scenic river designation.

**The Revised Forest Plan Fails to Address Climate Change**

There are at least two ways that national forest management plans can actively address climate change right now, according to existing science. The first is to immediately locate, protect and restore existing native old growth forest stands in a network that is connected and buffered across the landscape. This will help preserve critical biodiversity and provide migratory corridors for the wider spectrum of native flora, fauna and ecosystems to migrate as the Earth warms due to climate change. The second way is to protect and restore as much old growth forests as possible to sequester carbon. These are two positive actions that are available to us today. The Revised Forest Plan does neither, because it fails to prohibit harvesting old growth timber and does not adequately protect existing old growth, nor provide for an interconnected network of all old growth and near old growth native forests in order for ecosystems to adapt to climate change. Climate change must be addressed immediately to head off potentially catastrophic effects, and the Forest Service needs to stop cutting existing old-growth.

Regarding carbon sequestration, sadly it seems the Nantahala-Pisgah Plan disregards the documented carbon storing potential of old growth forests by asserting that young forests sequester carbon faster than old-growth forests, while ignoring the growing science that concludes old-growth forests continue to sequester large quantities of carbon, and that cutting down old growth will release stored carbon that will take many decades or even centuries to recover—if ever. The critical positive role of the mature old growth stands in forest cooling, surface water management and transpiration is also completely ignored in the Plan.

I also find it remarkable and very disturbing that the Forest Service position seems to be that their timber harvesting is insignificant in regards to contributing to the climate crisis. The U.S. Forest Service manages the largest amount of carbon-storage forests in the country. Yet the true climate, cooling, water cycle and carbon-storage benefits of mature intact forests are not adequately integrated in the agency’s decision-making.

Remedy: 1) Include and utilize the carbon, water management and climate benefits of mature forests and old growth forests in all modeling and decisions. 2) Manage mature and old-growth forests to preserve their carbon storage and biodiversity values.

**Public Input has not Been Adequately Incorporated**

According to the Friends of Panthertown, more than 92% of 22,000 public comments supported stronger protections and more protected areas. I was on a USFS zoom with the Blue Ridge Naturalist Network on March 8th, when the Forest Service speaker clearly explained that USFS does not weigh the relative amount or quantity of comments pro or con on any particular aspect of the plan – but rather just weighs the various comments (e.g. “do X” or “do Y”) regardless of how many times they heard those 2 different comments. This approach seems deeply flawed and undemocratic – especially given that we are talking about public lands.

The plan fails to protect more than 101,000 acres of important conservation and recreation hotspots. It places thousands of acres of old-growth forests and 45,000 acres of North Carolina’s natural heritage areas in the highest-priority logging designations — while placing more than a quarter-million more old-growth acres in logging-priority designations. The plan permits logging in the A.T. National Scenic Trail, Bartram Trail, Benton MacKaye Trail, and National Historic Trail of Tears corridors. These kinds of allowances are not at all in line with the bulk of public input.

Remedy: Please stand for our public lands and not just timber harvest targets in instituting the changes and improvements to the Plan that so many are asking for.

Thanks for your careful consideration,