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Comments: NOTICE OF OBJECTION AND STATEMENT OF REASONS

Submitted via electronic portal:
Nantahala and Pisgah National Forests Plan Revision Objection:
Ken Arney, Regional Forester
James Melonas, Forest Supervisor
cc: Randy Moore, Forest Service Chief

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 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. If necessary, the objector is willing to consolidate this objection under one of the lead objectors for the I Heart Pisgah coalition or its partners.

SUMMARY OF OBJECTION

The Craggy/Big Ivy section of Pisgah National Forest is a unique and special section of the Pisgah Nantahala National Forest that has overwhelming public, political, stakeholder, and local community support to be designated a Craggy National Scenic Area.

The Craggy/Big Ivy section of Pisgah National Forest includes the most visited and photographed panoramic vistas, world-class trails, waterfalls, trout streams, rare species, and ancient forests-just 15 miles from downtown Asheville.

The Forest Service failed to properly analyze over 4,000 acres of the Craggy/Big Ivy section of Pisgah National Forest in its draft ROD and FEIS and failed to include these key conservation and recreation areas in its Forest Scenic Area designation. The Forest Service also failed to fully consider and analyze the proposed Craggy National Scenic Area.

The Forest Service must amend its plans to include 4,000 acres of Snowball Mountain, North Fork, Shope Creek, and Ox Creek in its Forest Scenic Area and recommend the proposed Craggy National Scenic Area.

In addition, Alternative E fails to address key concerns identified by public input and must be remedied.

Alternative E contains significant errors, flaws, erroneous assumptions, and inaccuracies. It fails to address the key concerns and priorities expressed by most of its forest users. Over 92% of the 22,000 public comments urged the Forest Service to strengthen protections and increase protected areas. Alternative E must include the following remedies:

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

Protect all remaining old-growth forests.
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.

Protect ALL of Craggy as a National Scenic Area.

Fully evaluate climate and carbon storage benefits of intact, mature forests in all management decisions.

Include full and robust protections for ephemeral streams.

Protect all of the State Natural Heritage Areas.

Include species-specific plans and robust, enforceable protections for their habitat.

Fix the model inputs to accurately reflect old growth forests and natural disturbance.

Include more youth and diverse voices in forest decision making for the next 30 years.

Include more youth and diverse voices in forest decision making.

Protect the six PARCAs-Priority Amphibian and Reptile Conservation Areas-on the
Pisgah-Nantahala National Forest as a starting point for safeguarding herpetological and rare species diversity.

Adopt an accurate and consistent all-lands approach that considers the plan "in the context of the broader landscape" as required by the 2012 Planning Rule.

IV.REASONS FOR OBJECTION
The 16,000-acre Craggy/Big Ivy section of Pisgah National Forest is a unique and special section of the Pisgah Nantahala National Forest that has widespread public, political, stakeholder, and local community support to be designated a Craggy National Scenic Area.

The Craggy/Big Ivy section of Pisgah National Forest includes world-class trails, waterfalls, panoramic views, trout streams, and ancient forests-just 15 miles from downtown Asheville, N.C. Craggy is one of the largest old-growth forests in the East, home to dozens of rare and endangered species. It also boasts some of the steepest downhill mountain biking and best trail running in the country. Climbers ascend sheer granite faces, and hikers trek beneath ancient trees and emerald spruce-fir forests.

The 1,000-mile Mountains to Sea Trail-North Carolina's state trail, stretching from the Smokies to the Outer Banks-rolls along Craggy's ridgeline. Craggy/Big Ivy also includes the mile-high, 360-degree views from Craggy Gardens and Craggy Pinnacle along the Blue Ridge Parkway.

Water abounds in Craggy, including 70-foot Douglas Falls. Native brook trout shelter in cold headwater streams, which supply drinking water to Weaverville and Mars Hill, two rapidly growing municipalities. That water is also important to area farmers and communities.

The Craggy/Big Ivy section of Pisgah has superlative scenic character and integrity with recreational and economic importance. Over 500,000 visitors per year enjoy this area's scenic grandeur from the Blue Ridge Parkway. Around 5,000 drivers each day are greeted by the Craggy viewshed as they travel to Buncombe and Madison Counties from the north. 92% of the proposed Craggy National Scenic Area is visible from just a few popular and close-by vantage points and the immediate quarter-mile foreground of roads and trails.

Craggy/Big Ivy is surrounded by over 100,000 acres of protected wildlands, including national parklands, private conservation easements, state parklands, and two protected municipal water supplies.

Craggy/Big Ivy includes nearly 5,000 acres of State Natural Heritage Areas and a designated Research Natural Area. Craggy/Big Ivy also features some of the region's best examples of rich cove forest. Nearly every major ecozone occurs in Big Ivy, from spruce-fir forest to bottomland wetlands.

Over 10,000 people submitted comments to the U.S. Forest Service in support of the Craggy National Scenic Area. The Craggy National Scenic Area has also received unanimous bipartisan resolutions of support from the Buncombe County Commission and Asheville City Council, and over 150 local businesses and organizations support the Craggy National Scenic Area. In addition, the full Craggy National Scenic Area also has the full and immediate endorsement of the Nantahala Pisgah Forest Partnership-a coalition of 30 diverse organizations who have been working together to find common ground on the Pisgah-Nantahala National Forest since 2013.

The Nantahala Pisgah forest plan excludes 4,000 acres and places it in its highest-priority logging designation. These highest-priority logging areas in Craggy/Big Ivy include 1,500 acres of old-growth forest, the headwaters of the Ivy River (the drinking water source for the town of Weaverville), and the Snowball Trail, one of the most popular trails along the Blue Ridge Parkway. The Craggy National Scenic Area designation was also dismissed and never studied by the Forest Service without any explanation.

The best and highest use of Craggy/Big Ivy is as a Forest Scenic Area/National Scenic Area that protects this world-class viewshed, ancient forest, rare species refuge, recreational hub, and critical drinking water supply for Buncombe County.

A. The Forest plan failed to properly analyze 4,000 acres of Craggy/Big Ivy.

The U.S. Forest Service failed to adequately analyze 4,000 acres of the most important recreation and conservation areas in the Craggy/Big Ivy section of Pisgah National Forest.

The Matrix Management Area designation for 4,000 acres of Craggy overlooks multiple detailed comments from biologists, botanists, recreation leaders, and the local community highlighting the Forest Service's inadequate and inaccurate assessments of the Snowball, North Fork, Shope Creek, and Ox Creek sections of Craggy.

Rather than ground-truth and properly analyze the important values submitted by Buncombe County and its residents, the Forest Service delineated a scenic area based on a desktop analysis of visibility from a portion of the Blue Ridge Parkway. The Forest Service did not consider scenic integrity based on other significant vantage points, even though a field-verified scenic viewshed analysis was available and submitted along with the County's

resolution. Moreover, the Forest Service failed to consider the importance of the full area for protecting water resources, biological values, and recreation.

The inadequate and inaccurate analysis of Craggy failed to include any consideration of the following key attributes of the 4,000 acres placed in Matrix Management Area:

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.

The Town of Weaverville is experiencing rapid population growth and development, and it is currently evaluating a multimillion dollar upgrade to its wastewater treatment facility on the Ivy River downstream of Craggy/Big Ivy. Increased sedimentation from active management in Big Ivy will have a significant impact on water treatment facility costs and water quality for tens of thousands downstream.

Guided by North Carolina regulations, in the late 1990s, both Buncombe and Madison Counties developed and enacted watershed protection ordinances controlling land use development and related issues in the watershed area. The Ivy River Source Water Protection Plan was drafted in 2013 and notes the significant impacts of logging on the Ivy River's water quality.

The North Carolina Division of Water Resources, Public Water Supply (PWS) Section, completed in 2010 a Source Water Assessment Report for the Ivy River. The assessment results indicated an Inherent Vulnerability Rating of Higher due to physical characteristics of the watershed.

The Ivy River also provides water for several local businesses and farms in the local Big Ivy community that have been advocating for stronger protections of the forest since the 1980s. The community of Big Ivy rallied to stop logging projects in the Craggy/Big Ivy section of Pisgah National Forest in the 1980s, which led to plan amendment in 1994 that suspended logging in the Big Ivy section of Pisgah.

2. 1,500 acres of old-growth forests. Over 1,500 acres of old-growth have been inventoried in the Snowball and North Fork sections of Big Ivy. These are the most important sections of old-growth forest in the region and drive priority protection, not priority logging designation.

3. 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.

4. 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 50-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.

5. Scenic Values and Recreational Settings of the Snowball and Big Butt Trails-Snowball Trail is one of the most 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. The Big Butt Trail is contained within the plan's scenic area, but hikers' experiences depend on the viewshed from the trail. The trail's eponymous summit overlooks the Ivy Knob portion of the area, including areas where logging and road construction are anticipated.

6. 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, but the vantage point remains significant. The tower itself, in its new location, 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. The tower is also a significant vantage point of areas that the Forest Service is opening for logging.

7. Shope Creek contains old-growth forest and growing recreation use. Shope Creek shelters old-growth forest and rare communities and is the closest section of national forest to Asheville. It is highly visible from the Blue Ridge Parkway. It contains waterfalls and rare species on its slopes, including several species of declining migratory songbirds like the cerulean warbler. Recent timber harvest resulted not only in harm to recreational and scenic values, but also introduced invasive plants and caused negative changes in forest composition. This area's popularity as an emerging recreation destination outweighs the board feet of timber that can be harvested here. Protecting Shope Creek for its recreation and conservation values should be the highest priority for this section of forest.

8. Ox Creek shares a boundary with the Town of Woodfin Watershed. When logging was proposed previously in the municipal portion of this watershed, massive public outcry resulted in permanently protecting this watershed from logging in 2005. Logging federal lands within this otherwise protected water supply for a rapidly growing municipality would threaten water quality and raise concerns for the communities it serves.

9. Ox Creek contains a portion of the Mountains to Sea Trail. This 1,175-mile footpath from the Smokies to the Outer Banks. 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.

10. Unanimous local, political, stakeholder, and public support for protecting all of Craggy. The Buncombe County Commission has passed two unanimous bipartisan resolutions in 2016 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. Despite including discussion of the area's future management on its agenda multiple times, the County is unaware of any substantial public opposition to the National Scenic Area proposal. Indeed, the County is aware that the Nantahala Pisgah Forest Partnership-a coalition of over 30 diverse organizations, including the forest products industry, hunting organizations, and recreation groups-have fully endorsed the entire Craggy National Scenic Area.

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-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 and the public, the FEIS and ROD place over 4,000 acres of Craggy in the Matrix and Interface Management Areas, which are the highest-priority timber production designations..

The Forest Plan offers no explanation for excluding 4,000 acres of Craggy/Big Ivy and placing it in timber production management.

The Forest Plan inexplicably did not analyze the proposed Craggy National Scenic Area, stating: "Recommendation of the Big Ivy area as a National Scenic Area was considered in an alternative but not analyzed in detail in Chapter 2 of the EIS" (Appendix A, pp. 166-167).

In the Record of Decision, the forest plan states:
"Thousands of commenters wrote in support of a National Scenic Area recommendation in the Craggy Mountains/Big Ivy area of the Appalachian Ranger District with the purpose of ensuring protection and preservation of natural resources, scenic quality, and recreation opportunities. The Forest Service recognizes the public interest in protection of this area and included a range of alternatives that respond to the desire for wilderness recommendation and resource protection in the Craggy Mountains area.

"Following the comment period, elements of the National Scenic Area proposal were folded into Alternative E which recommends an expanded area for recommended wilderness and allocates much of the remaining area as a Forest Scenic Area within the Special Interest Area Management Area. The variation in the management area allocation in the range of alternatives adequately addresses the diverse public interests and values in the Craggy Mountains, Big Ivy, Snowball Mountain, and Shope Creek areas by recognizing their ecological diversity, scenic values, and recreational uses" (p. 56).

While it is true that portions of the broader Craggy/Big Ivy area were included in different management areas in different alternatives, some portions were only considered for timber production management, such as Shope Creek and Ox Creek. Furthermore, in the only alternative in which Ivy Knob and Snowball Mountain were considered for anything besides timber production management (Alternative C), the Forest Service provided no analysis of the benefits of more protective management to address the interests expressed by the public. In other words, it appears that the Forest Service considered the protection of Ivy Knob and Snowball Mountain to have no benefits. The County strongly disagrees.

In the Final EIS, the forest plan states:
"Alternative E expands Craggy Mountain Forest Scenic Area from the original area designated in the current plan and identified in other action alternatives. The Forest Scenic Area area was increased from 1,840 acres in other alternatives to 11,501 total acres in Alternative E and renamed to the Big Ivy/Craggy Mountains Forest Scenic Area to reflect that the landscape is larger than the Craggy Mountain alone. Since this Forest Scenic Area incorporates Special Interest Area acres, as well as Research Natural Area and Recommended Wilderness Area acres, the table above reflects 8,224 acres of Special Interest Area with a desired High SIO, 3,222 Recommended Wilderness with a desired Very High SIO, and a 55 acres Research Natural Area with a desired High SIO. In total these 11,501 acres in the Big Ivy/Craggy Mountain Forest Scenic Area will comprise most of the national forest lands visible from the Blue Ridge Parkway at Pinnacle Gap and Craggy Gardens" (3-488).

This description implicitly acknowledges that portions of the Blue Ridge Parkway viewshed are NOT protected at its most popular and most photographed vista. Furthermore, this description makes it painfully clear that the Forest Service did not consider the viewshed from other portions of the Parkway or other important area vantage points.

In Appendix A, the forest plan states:
"Several campaigns and form letters included comments advocating for the Big Ivy area of the Appalachian

Ranger District to be recommended for wilderness and a National Scenic Area. Commenters pointed to the area's rich biodiversity, old growth forests, clean waters, connectivity to other protected lands, scenic quality and visibility from the Blue Ridge Parkway and widespread public support for these national designations" (p.166).

The Forest Service provides no discussion anywhere in the ROD, FEIs, or Appendices for how it decided to exclude 4,000 acres of Craggy from Forest Scenic Area protection. It also
provides no explanation for why it placed Snowball, Ivy Knob, Shope Creek, and Ox Creek in its highest priority logging designations.

Only one sentence in the entire 1,500-page document indirectly addresses the exclusion of 4,000 acres of Craggy:
A portion of the Big Ivy area north of SR 197, and the western part of the Snowball Mountain area will be managed as Matrix and Interface MAs, allowing for vegetation management consistent with those MAs" (Appendix A, p. 167).

This is not analysis. A decision based on this conclusory statement would be wholly inadequate, arbitrary, and capricious.

The remedy is simple, and it already has complete local, public, political, and stakeholder support: Include the entire Craggy/Big Ivy area, including Ivy Knob, Snowball Mountain, Ox Creek, and Shope Creek in the Forest Scenic Area designation.

B. The Forest Service failed to study the Craggy National Scenic Area proposal, the most popular and publicly supported portion of the entire Nantahala Pisgah Forest Plan.

In "Alternatives Considered but Eliminated from Detailed Study," the Forest Plan states:
"An alternative that proposed specific management for the greater Craggy Mountains area including a National Scenic Area recommendation for a 16,000-acre area of the Black Mountain Geographic Area including the Craggy Mountains, Coxcomb Mountain, Snowball Mountain, Shope Creek, and Ox Creek areas. Thousands of commenters wrote in support of a National Scenic Area recommendation in the Craggy Mountains/Big Ivy area of the Appalachian Ranger District with the purpose of ensuring protection and preservation of natural resources, scenic quality and recreation opportunities. The Forest Service recognizes the public interest in protection of this area and included a range of alternatives that respond to the desire for wilderness recommendation and resource protection in the Craggy Mountains area.
"Following the comment period, elements of the National Scenic Area proposal were folded into Alternative E which recommends an expanded area for wilderness and allocates much of the remaining area as a Forest Scenic Area within the Special Interest Area Management Area. The variation in the management area allocation in the range of alternatives adequately addresses the diverse public interests and values in the Craggy Mountains, Big Ivy, Snowball Mountain, and Shope Creek areas by recognizing their ecological diversity, scenic values, and recreational uses" (2-27-28).

This two-paragraph dismissal of the most popular and publicly supported portion of the Nantahala Pisgah Forest Plan is wholly inadequate. The "variation in the range of alternatives" does not at all adequately address the "diverse public interests and values of Craggy. Nowhere in the analysis comparing alternative land allocations for different Alternatives does the Forest Service explain how any alternative would be more or less responsive to public comments or the underlying values they sought to protect. The "public interests and values in the Craggy" section of Pisgah National Forest have been resoundingly clear and united in supporting the Craggy National Scenic Area.

The Craggy National Scenic Area proposal received more public, political, community, business, and stakeholder

support than any other component of the Nantahala Pisgah Forest Plan. 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 has responded to its constituents who have twice filled the commission chambers in support of protecting all of Craggy/Big Ivy. Asheville City Council has also passed a unanimous bipartisan resolution supporting the entire Craggy National Scenic Area. In addition, the Nantahala Pisgah Forest Partnership has endorsed the protection of all of Craggy/Big Ivy as a wilderness and national scenic area. Over 150 local businesses and organizations have also endorsed the entire Craggy National Scenic Area.

Despite this 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 4,000 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.

C. Alternative E contains serious flaws, miscalculations, incorrect model inputs, and erroneous assumptions. It also fails to address key concerns identified by public input and must be remedied.

Alternative E contains significant errors, flaws, erroneous assumptions, and inaccuracies. It fails to address the key concerns and priorities expressed by most of its forest users. Over 92% of the 22,000 public comments urged the Forest Service to strengthen protections and increase protected areas. The following priorities emerged from public input on the forest plan over the past eight years. The Nantahala Pisgah Forest Plan Alternative E is substantially inadequate across these areas:

1. Lack of protected areas: The plan fails to protect over 101,000 acres of most important conservation and recreation hotspots. The analysis that placed Wilderness Inventoried Areas, Natural Heritage Areas, Mountain Treasures, I Heart Pisgah Priority Conservation Areas, and inventoried old growth forests into Matrix and Interface contains serious methodological errors and inaccurate Spectrum and NRV model assumptions.

Alternative E also places thousands of acres of old-growth forests in highest-priority logging designations. The Forest Service explicitly and intentionally decided not to include small-patch old-growth forest in its analysis, resulting in tens of thousands of acres of inventoried, documented old-growth placed in Matrix and interface Management Areas.

Most of I Heart Pisgah's 40 key conservation and recreation areas are placed in the highest-priority logging designations, including 2,000 acres of Panthertown Valley and 4,000 acres of Craggy. Areas in Panthertown are best suited for Special Interest Area and Backcountry Management Area designations. The areas in Panthertown proposed in the draft Forest Plan as Matrix should instead be managed as Backcountry, while the core of Panthertown should remain as a Special Interest Area. All of Craggy should be protected as a Forest Scenic Area and recommended for National scenic Area designation. As the forest plan's own economic analysis concludes, recreation provides at least five times more jobs and revenue than timber. Recreational hubs and trails should be prioritized over timber management.

2. Failure to protect Appalachian Trail, Mountains to Sea Trail, and other iconic footpaths: Logging is permitted in the A.T. National Scenic Trail Corridor and rules are weakened. The forest plan must provide enforceable restrictions on timber harvests in all major trail corridors and viewsheds. Logging is allowed in the Bartram Trail, Benton MacKaye Trail, Mountains to Sea Trail, and National Historic Trail of Tears corridors. Loopholes and discretion built into standards and guidelines must be tightened to prevent any logging in the Appalachian Trail, the country's most popular hiking footpath, and the other iconic trails of Southern Appalachia.

3. Failure to protect North Carolina Natural Heritage Areas: Over 65,000 acres of North Carolina's Natural Heritage Areas are in the highest priority logging designations. The forest plan has arbitrarily and capriciously excluded many natural heritage areas from protection. All state Natural Heritage Areas should be excluded from the timber base. Over 70% of rare species occurrences are in Natural Heritage Areas. Protecting all of North Carolina's Natural Heritage Areas is critical to meet Endangered Species Act requirements and ensure the persistence and recovery of federally listed species. Natural Heritage Areas also protect the most important habitats for 339 species of conservation concern identified in the forest plan.
4. Failure to protect old-growth forests: The forest plan failed to take an all-lands approach and consider the context of old-growth forests in the context of the broader landscape. Less than 2% of private forests in Western North Carolina are old-growth forest, according to the Forest Service's own data in the plan. The plan violates rules by not evaluating the national forest in the broader landscape, which is dominated by young forests and lacking old-growth. This is reflected in Alternative E, which proposes thousands of acres of inventoried old-growth for active management.

The plan authorizes cutting over 44,000 acres of existing designated old-growth. Over a quarter-million acres of old growth is placed in logging-priority designations. 20 percent of the highest-priority logging lands contain known, inventoried old-growth forests.

The plan opens 300,000 acres of old-growth forest to logging and excludes it from the old-growth forest network. This is because the Forest Service's old-growth and natural disturbance models are inaccurate, built on misleading assumptions, and fundamentally flawed. The Forest Service has tweaked model inputs so that the models intentionally underestimate the amount of natural disturbance historically and overestimate natural disturbance in the future. The Forest Service is attempting to create artificial need for timber harvests and inflate numbers for its own benefit rather than aiming for accurate NRV conditions.

The Forest Service intentionally removed protections and consideration for all small patches of old growth forest in the Pisgah-Nantahala, resulting in thousands of acres of old-growth forest now in highest priority logging designations.

5. Massive increases in timber harvests without adequate justification or analysis of impacts to water, listed species, recreation, and climate: The plan quadruples the amount of logging in publicly owned national forests and increases road building, sedimentation of streams, invasive species, and herbicide use. Logging is now allowed in significant portions of the Appalachian Trail, Art Loeb Trail, Bartram Trail, Benton MacKaye Trail, Mountains to Sea Trail, and Trail of Tears National Historic Trail corridors. Logging is allowed in the corridor of the Mountains to Sea Trail, North Carolina's state trail. The Snowball Trail, one of the most popular hiking trails along the Blue Ridge Parkway, is placed in the highest priority logging designation. Logging is now permitted in the viewsheds of the Pisgah-Nantahala's most popular recreational trail corridors. This contradicts the forest plan's own economic analysis demonstrating that recreation generates five times more jobs and revenue than timber harvests. The plan incentivizes timber harvests over recreation, especially in dozens of the most important recreation hotspots. The Pisgah-Nantahala-the most visited national forest in the country-prioritizes timber over recreation without any justification other than a purported and inflated need for young forests. This need is

inaccurate due to modeling errors and inaccurate inputs.

In addition, the plan provides no analysis of Alternative E's massive timber harvest increases on water quality or terrestrial and aquatic species. It claims that balancing age classes results in healthier forests, but it fails to address the specific impacts of quadrupling timber harvests on water or endangered species. It is impossible for a quadrupling of timber harvests to have no negative impacts on water or species, yet the plan seems to make this claim. It certainly lacks proper analysis of impacts to water and species.

Finally, it completely fails to analyze the impact of increased timber harvests on climate. This plan will last three decades and includes over one million acres of forest across an 18-county region, yet the plan claims that the forest's role in climate is inconsequential and not worth measuring. The plan fails to meet the requirements of the 2012 Planning Rule, Endangered Species Act, and its own ecological integrity goals by dismissing climate impacts and failing to measure carbon storage of mature forests.

6. Failure to implement the 2012 Planning Rule's all-lands approach: In addition, the forest plan failed to take an all-lands approach and consider the young forest and early successional habitat outside of the Pisgah-Nantahala Forest. Over 70% of forest lands in the 18-county Pisgah-Nantahala National Forest footprint are privately owned. As the forest plan's own data shows, these forests are skewed toward young forests already and contain less than 2% of old-growth. Old-growth is significantly underrepresented across the broader landscape and younger forests are overrepresented. The plan fails to take this all-lands inventory into account, which is a violation of the 2012 Planning Rule and a significant distortion of the true conditions of the national forest in the context of the broader landscape.

7. Failure to protect more Wild and Scenic Rivers: The plan recommends eight additional Wild and Scenic Rivers but denies 35 other qualified rivers without adequate explanation or justification. Among them, Panthertown Creek, Greenland Creek, and the East Fork of the Tuckasegee River should be reconsidered and found to be eligible for Wild and Scenic River designations. Wild and Scenic Rivers had widespread consensus among stakeholders and most communities. They also are important economic engines that can help support rural economies and protect endangered aquatic species and species of conservation concern.

8. No protections for ephemeral streams: The plan does not provide any buffers or protections for ephemeral streams. Several species of rare and endangered salamanders and snails depend on ephemeral streams during their life cycles. Failure to provide any buffers or protections for ephemeral streams is a violation of the Endangered Species Act and a failure of the plan to enable listed species and species of conservation concern to both persist and recover.

9. Logging on steep slopes: The plan allows logging on steep slopes, which will result in significantly more erosion and sedimentation, imperiling species and clogging popular rivers and creeks that are beloved among anglers, paddlers, and other forest users. This will also directly affect endangered aquatic species including the spotfin chub, Appalachian elktoe, little-wing pearly mussel, and Eastern hellbender.

10. No justification for 300 miles of additional roads: The plan authorizes the construction of 300 miles of additional logging roads, the largest contributor to sedimentation of streams and rivers in the forest. Yet it provides no justification for this substantial and unprecedented increase in logging road mileage. The increased road mileage is even more unsustainable and unjustifiable when the Forest Service cannot adequately maintain its existing road infrastructure. Committing to hundreds of miles of additional roads over the life of the plan fails to meet the plan's state goal of ecological integrity and violates the 2012 Planning Rule.

11. No analysis of significant increases in herbicide use: Timber harvests will require significant increase in herbicide applications. The Forest Service provides no accounting of herbicide use or increases anywhere in the

plan, nor does it attempt to calculate its impact on water, soils, or wildlife. The rusty-patched bumblebee, a federally listed species, could be significantly impaired by a quadrupling of herbicide use across the national forest.

12. Inadequate wilderness recommendations: The plan recommends the least possible amount of wilderness-less than half of wilderness under consideration. The plan removes one Wilderness Study Area from recommendation. The plan ignores 92% of public comments supporting more protected areas for the Pisgah-Nantahala National Forest. The plan ignores the Nantahala Pisgah Forest Partnership compromise recommendation for more wilderness. Over 100,000 acres of Wilderness Inventoried Areas are left unprotected and open to logging.

13. Lack of species-level protections for endangered and threatened species and species of conservation concern: The plan quadruples timber harvests, but the Forest Service inaccurately and unjustifiably claims that this massive increase in timber harvests will have no negative impact on any of the federally listed species or 339 species of conservation concern. This coarse-filter analysis is wholly inadequate to address the specific needs of individual species, especially endemic species and dispersal-limited species.

At least 20 rare species have most of their habitat placed in logging-priority designations under Alternative E, but the plan provides no species-specific plans or protections. Protecting all 65,000 acres of vulnerable Natural Heritage Areas is essential for ensuring the persistence and recovery of federally listed species in the Pisgah-Nantahala National Forest. Quadrupling timber harvests and building up to 300 miles of new roads will have a significant impact on federally listed species and species of conservation concern. Protecting all Natural Heritage Areas will ensure that core habitat for imperiled species remains.

The Pisgah-Nantahala National Forest is home to more species of salamanders than any other national forest in the country, but the plan offers no additional protections for rare salamanders. Several salamanders of conservation concern will be jeopardized by increased logging in spruce fir forests, northern hardwood forests, and cove forests. Species such as the hellbender will be affected by increased siltation and sedimentation from quadrupling timber harvests, but no analysis is provided in the plan.

The Northern long eared bat and Virginia big eared bat are federally listed species who depend on intact mature forests. Under Alternative E, the forest plan will expand logging in their habitat with no enforceable limits on gap or patch sizes, and only a general guideline of 40 acres to 80 acres. As the forest plan itself notes, Northern long eared bat and Virginia big eared bat are harmed by disturbances of less than 10 and 20 acres respectively. The plan will directly jeopardize federally listed species and their habitat.

The plan emphasizes management for a few game species like deer and turkey at the expense of hundreds of rare and endangered species. It unjustifiably concludes that species will persist despite a quadrupling of timber harvests but provides no justification for this conclusion. It also fails to meet its mandate under the Endangered Species Act to ensure that federally listed species not just persist but also recover.

The plan also rejects the protections provided by PARCAs-Priority Amphibian and Reptile Conservation Areas. Partners for Amphibian and Reptile Conservancy has proposed six PARCAs on the Pisgah-Nantahala National Forest as a starting point for safeguarding herpetological and rare species diversity. The Forest Service dismissed PARCAs from consideration with little explanation other than PARCAs alone are not adequate. However, they provide an ideal starting point for protecting reptiles and amphibians and are widely supported by the scientific community and stakeholders.

14. Failure to address climate and the carbon storage benefits of old forests: Alternative E quadruples timber harvests and includes thousands of acres of old-growth forests in Matrix and Interface Management Areas. The climate and carbon-storage benefits of mature, intact forests are not included in decision-making. This violates

the 2012 Planning Rule and fails to meet ecological integrity goals.

The U.S. Forest Service is the owner of the largest stock of carbon-storage forests in the country. Yet the forest plan fails to even attempt to account for the climate and carbon storage benefits of its forest. The forest plan does not measure climate impacts of quadrupling timber harvests. As a result, this plan results in significant climate harm that will affect the region for decades.

15. Inadequate environmental justice analysis and considerations: under Alternative E, the forest plan will ramp up timber harvests, degrading air and water quality across the region. However, the plan does not account for these impacts, especially on communities who have already been disproportionately affected by air and water pollution. The forest plan explicitly excludes Black and Hispanic communities from environmental justice considerations. Environmental justice issues were raised by Black communities during public hearings but were not addressed by the plan.

The forest plan also ignores 92% of public comments, which called for more protected areas and stronger protections for the shared natural resources of the publicly owned national forest. These protected areas would provide air, water, climate, and economic benefits to the most historically disadvantaged communities. The Forest Service's own economic analysis shows that recreation provides five times more jobs and revenue than timber, yet the plan proceeds to prioritize timber harvests at the expense of protecting the recreation and scenic resources that drive mountain economies today.

The forest plan does not measure climate, air, and water impacts of quadrupling timber harvests on the national forest surrounding environmental justice communities.

V. REMEDIES

The Nantahala-Pisgah Forest Plan should not quadruple logging and weaken protections for the most popular national forest in the country. It should include stronger, enforceable standards and guidelines and more protected areas.

Across the key areas of public engagement and concern, the Forest Service should revise the Forest Plan to include the following:

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

Protect all remaining old-growth forests.

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.

Reduce logging targets, road-building targets, and herbicide use across the forest.

Protect ALL of Craggy as a National Scenic Area.

Fully evaluate climate and carbon storage benefits of intact, mature forests in all management decisions.

Include full and robust protections for ephemeral streams.

Protect all of the State Natural Heritage Areas.

Include species-specific plans and robust, enforceable protections for their habitat.

Accurately account for natural disturbance and old-growth forests in all modeling.

Include more youth and diverse voices in forest decision making.

Protect the six PARCAs-Priority Amphibian and Reptile Conservation Areas-on the Pisgah-Nantahala National Forest as a starting point for safeguarding herpetological and rare species diversity.

Adopt an accurate and consistent all-lands approach that considers the plan "in the context of the broader landscape" as required by the 2012 Planning Rule.

VI. REQUEST FOR RELIEF

With the draft ROD and Final EIS, the U.S. Forest Service missed an opportunity to adopt widely supported, collaborative solutions that had broad, diverse public support. However, the Forest Service still has an opportunity to fix the plan with the aforementioned remedies.

The Forest Service failed to properly evaluate 4,000 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 4,000 acres of Snowball Mountain, North Fork, Shope Creek, and Ox Creek in its Forest Scenic Area. It must also study and recommend the Craggy National Scenic Area.

In addition, it must adopt the remedies for Alternative E supported by the vast and overwhelming majority of forest users: protect all 101,000 acres of the most important conservation areas, including the I Heart Pisgah Key Conservation Areas and Mountain Treasures; protect all remaining old-growth forests; 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; reduce logging targets, road-building targets, and herbicide use across the forest; protect ALL of Craggy as a National Scenic Area; fully evaluate climate and carbon storage benefits of intact, mature forests in all management decisions; include full and robust protections for ephemeral streams; protect all of the State Natural Heritage Areas; include species-specific plans and robust, enforceable protections for their habitat; accurately account for natural disturbance and old-growth forests in all modeling; include more youth and diverse voices in forest decision making; protect the six PARCAs-Priority Amphibian and Reptile Conservation Areas-on the Pisgah-Nantahala National Forest as a starting point for safeguarding herpetological and rare species diversity; adopt an accurate and consistent all-lands approach that considers the plan "in the context of the broader landscape" as required by the 2012 Planning Rule.

Thank you for considering this objection.