Data Submitted (UTC 11): 3/17/2022 4:00:00 AM
First name: Joy
Last name: Lew
Organization:
Title:
Comments: Dear U.S. Forest Service,

As a resident and small business owner next to Pisgah National Forest:

The Pisgah-Nantahala Forest Plan should not quadruple logging and weak n protections for the most popular national forest in the country. It should include stronger protections and more protected areas.

Please revise the 30-year Pisgah-Nantahala Forest Plan[middot]to include the following:

* Protect all 101,000 acres of the most important recreation and conservation areas.
* Protect all remaining old-growth forests.
* Protect ALL of the Craggy National Scenic Area.
* Prohibit logging on steep slopes
* Prohibit logging in the Appalachian Trail viewshed and other major trail corridors and viewsheds.
* Prohibit logging within 100 feet of all waterways, including ephemeral streams.
* Include the carbon and climate benefits of mature forests and old-growth forests in all decisions
* Reduce the amount of logging and pesticide use in the country's most popular national forest.
* Prioritize recreation and conservation.
* Protect all of the State Natural Heritage Areas.
* Include species-specific plans and robust, enforceable protections for the1r habitat.
* Fix the model inputs to accurate y reflect old-growth forests and natural disturbance.
* Adopt the Nantahala Pisgah Forest-Partnership Agreement.
* Include more youth and diverse voices in forest decision making for the next 30 years.

The Forest Service failed to properly analyze 4,000 acres of the Craggy/Big Ivy section of Pisgah National Forest in its draft ROD and FEIS. As a result, it 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. [middot]

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

In addition, the Forest Service's Alternative E failed to address 10 key issues raised by public input. I object to the Forest Plan and provide remedies below. The Forest Service has provided new information by introducing a brand new Alternative and a/brand new Management Area in the final plan that was not available for comment in any previous drafts.

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The U.S. Forest Service received an[middot]unprecedented, record-setting number of comments on the Nantahala Pisgah Forest Plan. Over 2 ,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 support a 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 theentire Craggy National Scenic Area.

The Nantahala Pisgah Forest Partnership-a coalition of over 30 diverse 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/B}}i 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[middot]in the parking lot on a cold winter evening for the opportunity to expr ss 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 4,000 acres of Craggy's most important conservation and recreation areas in the Matrix Management Area.

Placing 4,000 acres of Craggy's most important recreation and conservation areas in

Matrix Management Area disregards the unanimous and overwhelming local and community support, 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.

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1. 1,500 acres of old-growth forests. 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.

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. [middot]
2. 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 C eek/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.
3. The Snowball Trail-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. Oyer 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[middot]bat species. The Snowball Trail also connects with the Mountains to Sea Trail, North Carolina's State Trail.
4. 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[middot]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 th 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 th anchor of the Big Ivy

Historical Park.

1. 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.
2. Ox Creek shares a boundary with the Town of Woodfin Watershed. When logging was proposed previously in this watershed, massive public outcry resulted[middot]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[middot]for the communities it serves.

3. 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 y the Blue Ridge Parkway and Southern Appalachian Highlands Conservancy conservation easements.
4. The Forest[middot]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 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 d cision.

The Forest Service must.amend the plan to The Forest Service failed to properly evaluate approximately 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 ame d its plans to include 4,000 acres of Snowball Mountain, North Fork, Shope Creek, and Ox Creek in its Forest Scenic Area.

In addition, Alternative E fails to address key concerns identified by public input and must be remedied. The forest plan introduced a new alternative and a new management area that did not appear in previous drafts. My objection is authorized by the addition of this new information in the final EIS .and draft ROD.

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 10 priorities emerged from public input on the forest plan over the past eight years. The

Nantahala Pisgah Forest Plan is substantially inadequate across all 10 areas:

Protected AREAS: The plan fails to[middot]protect over 101,000 acres of most important conservation and recreation hotspots. It places thousands of acres of old-growth forests in highest-priority logging.designations. 45,000 acres of North Carolina's Natural Heritage Areas are in the highest priority logging designations. Logging is permitted in the A.T. National Scenic Trail Corridor and rules are weakened.-[middot]Logging is allowed in the Bartram Trail, Benton MacKaye Trail, and National Historic.. Trail of Tears corridors. 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. A record-setti g number of public comments supporting mor protected areas have been mostly ignored.

OLD-GROWTH FORESTS: The plan authorizes cutting over 44,000 acres of existing designated old-growth.
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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. The Forest Service's

old-growth and natural disturbance models are inaccurate, built on misleading assumptions, and fundamentally flawed. 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. The plan violates rules by not evaluating the national forest in the broader landscape, which is dominated by young forests and lacking old-growth.

SIGNIFICANTLY INCREASED LOGGING: The plan quadruples the amount of logging in' publicly owned national[middot]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. A new timber harvest project includes industrial logging in the Appalachian Trail corridor and Trail of Tears National Historic Trail corridor near a historic Cherokee village site. 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. The plan incentives timbe harvests over recreation, especially in dozens of the most important. recreation hotspots. The plan weakens protections for all trails-including national scenic and historic trails. Recreation provides five times[middot]more jobs and revenue than timber harvests, according to the plan's own analysis. The Pisgah-Nantahala-the most visited national forest in th country-prioritizes timber over recreation.

TRAILS AND RECREATION: 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[middot]. A new timber harvest project includes industrial logging in the Appalachian Trail corridor 'and Trail of Tears National.Historic Trail corridor near a historic Cherokee village

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Recreation provides five times more jobs and revenue than timber harvests, according to the plan's own analysis. The Pisgah-Nantahala-the most visited national forest in the country-prioritizes timber over recreation.

WATER: The plan recommends eight additional Wild and Scenic Rivers but denies 21 other qualified rivers. The plan does not provide any buffers or protections[middot]for ephemeral streams. The plan allows logging on steep slopes. T e plan authorizes the construction of 300 miles of additional logging roads, the largest contributor to sedimentation of streams and rivers in the forest. The plan fails to address.erosion and sedimentation of streams from its existing road network and backlog of road maintenance. Timber harvests will require significant incr ase in herbicide applications. The Forest Service will not measure impacts of increased herbicide use on water, wildlife, or human health.

WILDERNESS: The plan recommends the least possible amount of wilderness-less than half of wilderness under[middot]consideration. The plan removes one Wilderness Study Area from recommendation. The plan ignores 92% of public comm nts s pporting mor.. 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 Wild rness Inventoried Areas are left unprotected and open to logging.

ENDANGERED SPECIES AND WILDLIFE: The plan lacks species-specific plans[middot]or protections. At least 20 rare species have most of their habitat placed in

logging-priority designations. The plan quadruples timber harvests,[middot]_but the Forest Service downplays the impacts of increased logging on rare and endangered species. The Pisgah-Nan ahala 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. The plan emphasizes management for a few game species like deer and turkey at the expense of hundreds of rare species[middot]. The plan does not protect key species hotspots, especially dispersal-limited species. The plan fails to protect rare aq4atic species from massively increases in timber harvests[middot]; The plan does not adequately protect 339 species of conservation concern.

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CLIMATE: The climate and carbon-storage ben fits of mature, intact forests are not included in decision-making. Increased timber harvests are prioritized over the climate and ecological benefits of mature, intact forests. . The .forest plan does not measure climate impacts of quadrupling timber harvests. This 30-year plan results in significant climate harm that will affect the region for decades. The[middot]u:s. Forest Service is the owner of the largest stock of carbon-storage forests in the country.

The plan has not included youth, diversity, or communities most affected by the climate crisis in a plan that will guide the next 30 years of a 1-million-acre national forest.

PUBLIC LANDS, EQUITY, AND ENVIRONMENTAL JUSTICE: The forest planning process failed to include the input of youth, who will be affected most by this 30-year plan.

Hundreds pf youth participated in a rally and advocated for more prot cted areas in the Pisgah-Nantahala, and their input has been ignored .by the Forest Service. The forest planning process has not included diverse stakeholders. Nearly all of-the decision-makers and members of the stakeholders' forum are white and male. The Forest Service is currently planning a commercial timber harvest in the Trail of Tears.National Historic Trail Corridor and on the site of a historic Cheroke village. The forest planning process fails to consider impacts of timber harvests and degraded air and water quality on the most vulnerable communities. The forest plan excludes Black people and communities from Environmental Justice considerations. The forest plan excludes Hispanic people and 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 ignores 92% of public comments, which called for more protected areas and stronger protections for the shared natural resource of the publicly owned national forest. The forest plan does not measure climate, air, and water imacts of quadrupling timber harvests on the national forest surrounding environmental justice communities. The plan dismsses the climate impacts of quadrupling timber[middot]harvests as outside the scope of the forest plan. The forest plan fails to calculate the impact of subsidizing timber sales on publicly owned land at a net loss to taxpayers. The forest plan fails to calculate the lost revenue for private landowners whose timber is devalued by subsidized timber sales on public lands. The forest plan recommends 4,000 acres of logging in the proposed Craggy National Scenic Area, which has widespread and overwhelming public support for permanent protection.

The Forest Service has chosen to reject the compromise agreement of the Nantahala Pisgah Forest Partnership, which provided collaboration and cooperation from stakeholders.

CRAGGY NATIONAL SCENIC AREA: The Forest Scenic Area designation for part of Craggy provides key support for the proposed Craggy National Scenic Area. However, the plan also places the rest of Craggy-approximately 4,000 acres-in the highest-priority logging designations. Over 1,500 acres of old-growth in Craggy are placed in the highest-priority logging designations. The Snowball Trail-one of the most popular footpaths along the Blue Ridge Parkway is placed in the highest priority logging designation. The headwaters of Ivy River--[middot]i:he drinkir:g water sourc for-Weaverville and communities downstream-is in the highest priority logging designation. T)r,lp of the most popular and most scenic sections-Shope Creek and Ox Creek-are in

logging-priority designations. Over 4,000 acres within the Blue Ridge Parkway viewshed are in highest-priority logging designations. The plan failed to recommend the complete Craggy National Scenic Area despite receiving over 10,000 comments supporting it and 150 local businesses and organizations endorsing it. Unanimous bipartisan resolutions from Asheville City Council and Buncombe County'commission were ignored Recommendation for the complete Craggy National Scenic Area from the Nantahala[middot]Pisgah Forest Partnership was ignored. The Forest Plan us d-a Craggy vista as the cover photo for its entire forest plan yet fails to fully protect it.

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 these 10 key areas of public engagement and concern, the Forest Service should revise the Forest Plan to include the following:

1. Protect all 101,000 acres of the most important conservation area, including the I Heart Pisgah Key Conservation Areas and Mountain Treasures. [middot]
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. [middot]
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.
11. Adopt the Nantahala Pisgah Forest Partnership recommendations.

Thank you for your consideration.

Joy Lew