

Data Submitted (UTC 11): 3/21/2022 4:00:00 AM

First name: Keren

Last name: Giovengo

Organization:

Title:

Comments: To:Ken Arney and James Melonas, U.S. Forest Service

Re: Objection to Nantahala and Pisgah NFs Plan Revision #43545

Dear Ken Arney and James Melonas, U.S. Forest Service,

The Pisgah-Nantahala Forest Plan shouldn't quadruple logging and weaken protections for the country's most popular national forest [mdash] it should strengthen protections and increase protected areas. The plan must be revised to do the following:

[bull] Protect all 101,000 acres of the most important recreation and conservation areas. [bull] Protect all remaining old-growth forests. [bull] Protect the entire Craggy National Scenic Area. [bull] Prohibit logging on steep slopes. [bull] Prohibit logging in the Appalachian Trail viewshed and other major trail corridors and viewsheds. [bull] Prohibit logging within 100 feet of all waterways, including ephemeral streams. [bull] Consider the carbon and climate benefits of mature and old-growth forests for all decisions. [bull] Reduce logging and pesticide use. [bull] Protect all of the state natural heritage areas. [bull] Include plans to help safeguard specific species, as well as robust, enforceable protections for their habitat. [bull] Accurately account for natural disturbance and the need for more old growth forests. 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. 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 designation.

In addition, in choosing Alternative E [mdash] rather than any of the four alternatives released to the public [mdash] the Forest Service has picked a final plan that wasn't available for public comment. Alternative E fails to address the key concerns and priorities expressed by most forest users. More than 92% of 22,000 public comments supported stronger protections and more protected areas.

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 65,000 acres of North Carolina's natural heritage areas in the highest-priority logging designations [mdash] 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.

I object to the plan and request the Forest Service to fix the plan's significant errors, flaws, erroneous assumptions, and inaccuracies as detailed in the bullet points above. I am willing to consolidate my objection with the I Heart Pisgah coalition. Thank you for your consideration.