

Data Submitted (UTC 11): 8/12/2024 9:00:32 PM

First name: Kevin

Last name: Massey

Organization: Wild South

Title: Executive Director

Comments: The model followed by the draft EA fails to communicate adequate understanding of proposed actions. Meaningful public response is so difficult as to call into question whether public scoping has taken place in any satisfactory way. The maps / geospatial data are only vaguely related to actual actions, so that it is unclear what is happening and where.

GAP puts forth a "toolbox" model, the merits of which are far from apparent in the draft EA. First the draft EA communicates that all tools apply everywhere, then it tries to walk that assertion back in the fineprint.

I have met no member of the public that understands GAP's model and proposed actions, and have met only one or two USFS personnel that do. Everyone else is confused and concerned.

Being confused, it is difficult to offer alternative ideas where there are areas of concern. If the model followed by the draft EA is problematic, what model would better serve? It is hard to say, but my first thought is that if there is a list of tools in the toolbox, then we need a map layer for each tool. Each layer shows where the tool is currently believed to be applicable. That applicability may be further reduced in future, when more timely analysis occurs prior to implementation. But for now, at least, we can understand WHAT we're talking about and WHERE we're talking about it. Then, together we can build a shared understanding of the factors making that tool more or less suitable.

I have had multiple conversations with Forest Service personnel about an action in the toolbox and its clear lack of suitability in a particular location. The response has generally been "Oh don't worry we would never do that there." If that is so clear even now, then why can that knowledge not be applied now to refine each tool's geospatial layer for all to understand?

GAP\_AOI\_ID = GRF25 (Linville Mountain North)

AOI includes the narrow strip of land between Old NC 105 and the Linville Gorge Wilderness boundary - highly unsuitable for prescribed burning. While the road could provide adequate containment to the west, to east there would have to be new fire line constructed along the wilderness boundary, marring wilderness values and effectively constructing an unauthorized trail highly likely to be heavily used in this heavily recreated area.

Recommend to remove this narrow strip from the AOI, using Old NC 105 as the AOI's eastern boundary instead of the wilderness area.

In addition to the narrow strip of land discussed above, the AOI includes two larger areas of extremely high recreation value - one in the Linville Falls area and another surrounding Wiseman's View. These areas are highly unsuitable for prescribed burning for the reasons given above - extremely difficult to control without significant fire line construction, marring wilderness values and effectively constructing highly popular unauthorized trails. But these two areas deserve special mention because - while inclusion of the narrow strip of land to east of Old NC 105 appears to have been accidental, these larger areas at Linville Falls and Wiseman's View appear to have been included deliberately, if ill-advisedly. It may also be worth noting that these two areas are both old growth. Recommend to remove from the AOI these areas to the east of Old NC 105.

AOI includes two significant portions of the wilderness area due to errors in the USFS wilderness boundary layer. This error has already been reported to USFS, yet has not been corrected. Locations are north of the Bynum Bluff Trail parking area and south of the Babel Tower Trail parking area.

Similar to the narrow strip of land to east of Old NC 105, there is a narrow strip west of US 221. This too appears to have been in error, as there is no possibility of prescribed burning in that narrow and extremely rocky ravine between North Fork Catawba River and US 221. Perhaps this AOI was drawn without considering the transportation layer.

The extreme recreation value of the Linville Falls area - which includes both the Linville Falls Trail trailhead and the Linville Gorge Information Cabin renders it highly unsuitable for timber actions. Balanced against this is the need to reduce wildfire risk to adjacent private property. Both objectives could be achieved with a suitable buffer along Old NC 105. But if this is already understood by USFS, it is not communicated clearly in the draft EA. As it stands now, all timber tools in the Gap toolbox appear to be alleged as suitable for this area whose recreation value to the local economy dwarfs any possible timber value.

While the confusing spatial layer paradigm of the draft EA makes it virtually impossible for anyone to understand what is intended for the non-saw-timber activity area to west of Old NC 105, the significant recreation value of this area appears to have been inadequately appreciated if not ignored. Dispersed camping along the west side of Old NC 105 is extremely common, product of deliberate and appropriate management strategy to reduce camping impacts within the adjacent wilderness area. Diminishing the dispersed camping experience along Old NC 105 would severely disrupt the wilderness management balance achieved over half a century. If actions are indeed warranted, then a significant buffer along the road could achieve the desired results without damaging this successful recreation/wilderness management strategy.

In this area of extreme recreation use, any timber-management roads or fire lines constructed will be highly likely to become used as trails. If indeed the Forests find unauthorized trails to be unacceptable, then they must take responsibility for the fact that the vast majority of unauthorized trails are precipitated by management action. Any actions in heavily recreated areas must either seek to mitigate this effect, or take full responsibility for the consequences.

Old growth in this AOI's timber Activity areas augments concerns about the draft EA's unclear communication of proposed actions.

#### GAP\_AOI\_ID = GRF29 (between Old NC 105 and FSR 106)

Draft EA fails to clearly communicate actions along the Mountains-to-Sea Trail. Recreation values there appear to be at risk, raising concerns based on 1) timber management's past and present (e.g., GAP vs Appalachian Trail) disregard for recreation, its importance to National Forest relevancy, and its criticality to local economies, and 2) USFS frequent failure to restore recreation infrastructure after fire and timber actions. If conservation measures are planned for this trail corridor, then why is this not reflected in the spatial data provided with the draft EA?

#### GAP\_AOI\_ID = GRF27 (Back-Irish)

This AOI indicates prescribed burning adjacent to the wilderness boundary - sometimes using natural streams as containment but also indicating new fire line construction along the wilderness boundary itself in the vicinity of the Shortoff Mountain summit. If this is an artifact of the draft EA's failure to clearly communicate the burn units in which burning will actually take place, then the issue is the draft EA's geospatial paradigm that all outside the agency (and most inside the agency) agree is a major failing of the document. Or was this AOI's boundary drawn without full consideration of the facts? But if it was drawn deliberately, then concerns include the fact that any new fire line construction in the vicinity of the wilderness boundary will both mar wilderness values and establish new unauthorized trails that further mar values in an area considered for wilderness addition.

In the more actively managed portion of this AOI, the primary failing of the draft EA is to clearly convey what proposed actions are actually on the table. Whatever actions are proposed, it should be noted that this area has a significant problem with unauthorized mountain bike trail construction that builds off of previous inadequately-decommissioned timber access routes. If these routes are reinforced and expanded, additional unauthorized trails are sure to follow, for which USFS must take responsibility in the face of the Forest Plan's direction to issue a Forest-wide closure order against off-system riding.

GAP\_AOI\_ID = GRF23 & GRF24

This AOI contains two well established unauthorized trails vulnerable to increased use due to GAP actions. Both are used by mountain bikes. One extends FSR 4212 down to meet FSR 228. The other follows Lettered Rock Ridge from the Hawksbill Trail parking lot down to Steels Creek. The Lettered Rock Ridge route seems mostly likely to be exacerbated by GAP timber projects. Note that this timber activity is impossible to assess because of the draft EA's presentation, but it can still be generally understood that some sort of project access will be developed, perhaps along the route of the existing unauthorized trails, and that this access will increase the off-system bike travel identified as a Forest concern in the Forest Plan.

The purpose and need for prescribed burning in this area cannot be doubted, particularly with the Gingercake Acres WUI to the north. Nevertheless there is concern about corresponding damage to the MST. Better shared understanding with trail maintenance partners - and a documented agency commitment to repair project damage to the MST - would be appropriate.

Old growth within the Bandy Cove Mountain timber Activities polygon further increases concern about the draft EA's unclear communication of proposed actions.

GAP\_AOI\_ID = GRF21 (Brown Mountain)

The extensive timber activity in the Brown Mountain area appears to reckon without the consequences to the OHV trail system. OHV trails are few and far between on the NFsNC, making the Brown Mountain OHV Area critical to meeting this need and mitigating trail piracy by the resource-damaging activity of motorized off-road vehicles. Timber activity proposed across the Brown Mountain OHV Area seems certain to: 1) damage the trail system while failing to repair that damage during project closeout, and 2) open up many miles of new unauthorized trails, especially to motorcycles. The draft EA's unclear communication of proposed actions could be exaggerating these concerns, but it seems likely that no matter what conservation measures the project planners have encrypted into the draft EA appendices, these concerns will still retain some validity. Again, as mentioned elsewhere in these comments, it is the agency that is responsible for resource damage arising from the unauthorized trails its actions create.

GAP\_AOI\_ID = GRF22 (Old Way Ridge)

The historical "Shotgun" trail - today used as a popular mountain biking trail called "Beehive" - runs from FSR198 down to FSR197. The upper half of its length lies within one of the draft EA's ambiguous Activity polygons. Whatever action is actually planned here, any augmentation of the unauthorized trail route is sure to impact its use. That's not inherently a negative consequence, but projects here would do well to incorporate recreation management into project implementation, with the potential to incorporate planning of a system trail along this corridor. If however, a decision approving GAP activity in this area would inherently prevent creation of a system trail until after GAP implementation, then this will effectively guarantee continued resource damage along this popular route. If the Forest Plan is calling for a closure order against off-system bike travel, then GAP proposed

actions cannot prevent development of a system trail along the "Beehive" corridor without culpability.

Old growth in this AOI augments concerns about the draft EA's unclear communication of actions proposed in the timber Activity areas.

#### GAP\_AOI\_ID = GRF18 (Simmons Ridge)

There is a popular unauthorized mountain bike trail through this AOI that runs along an inadequately-decommissioned previous timber management route. This route's suitability as a future system trail is questionable given its lack of connectivity to non-WSA system trails. GAP timber activities could open up this route and exacerbate off-system bike travel in this area - a Forest-level concern identified in the Forest Plan. On the other hand, GAP activities here could give opportunity to properly decommission the route. It would seem that documenting this issue for the benefit of those program managers implementing the project would be critical to the best possible success. It would also be important for recreation management to be engaged - not just timber and fire - given the longstanding issue of illicit mountain bike riding in the adjacent Harper Creek Wilderness Study Area. That illicit riding is a direct result of previous USFS actions, and GAP could be an opportunity to take a step toward setting things right.

If the above unauthorized bike trail is instead planned as a fire line, then its decommissioning could be impossible. The draft EA fails to clarify the boundaries of actual burn blocks. Repeated requests to USFS for fire line geospatial data during this comment period went unanswered, so it is difficult to provide meaningful response.

Old growth in this AOI augments concerns about the draft EA's unclear communication of actions proposed in the timber Activity areas.

#### GAP\_AOI\_ID = GRF17 (Persimmon Ridge in Harper Creek WSA)

This AOI follows Persimmon Ridge, as does the western section of the Persimmon Ridge Trail. That trail section is being discussed for closure and decommissioning. That decommissioning could be rendered difficult or impossible if the fire shop keeps reopening it for use as a fire line, and/or burning off any heavies used to block the trail. Some solution could be found to move forward, but engagement of recreation management in the planning process would be critical to successful resource protection.

#### GAP\_AOI\_ID = GRF09 (Timber Ridge in Lost Cove WSA)

An unauthorized trail runs up the ridge from Gragg Prong parking area toward Bee Mountain. "Unauthorized" is a misnomer, because USFS itself caused the trail to come into existence by erroneously publishing that there was a trail there. Many maps still include the false route. The unauthorized trail is currently in process of being decommissioned as part of a partner-agency collaboration. Prescribed burning in this area could burn away some of the woody debris - possibly even some heavies - used to decommission the route. Future implementation should consider this, with actions including thorough post-burn re-decommissioning of the trail.

Another unauthorized mountain bike trail ("Timberdrop") runs from Timber Ridge straight down to near Huntfish Falls. It too is currently being decommissioned in a partner-agency collaboration, and may need the same post-burn re-decommissioning as above.

Another social trail of USFS creation is the dozer line put in during the recent Lost Cove Fire. Where the dozer

line intersects the Lost Cove Loop Trail (northwest of the Bee Mountain summit), post-fire restoration simply didn't happen, so that the dozer line intersects the system trail and creates confusion and private trespass. BAER funds were supposedly identified to deal with this, but how those funds were spent is a mystery. As this dozer line is apparently now being used as a burn block boundary for this GAP AOI, it is important that proper post-burn restoration take place in future.

Here and for other AOI's, actual burn block boundaries would have been far more useful than AOI polygons. Where this AOI boundary simply follows private property boundaries, it is impossible to understand what actions are being proposed.

#### GAP\_AOI\_ID = GRF11 (White Rocks)

The draft EA does not make clear what timber actions are proposed in this AOI, but they appear likely to impact the White Rocks and Wilson Creek Trails. Resources for post-action restoration of these system trails should be provided as part of project implementation.

#### GAP\_AOI\_ID = GRF13 (Mulberry)

This area is rife with unauthorized horse and bike trails. Partner development and collaboration has been underway for years, aiming toward system trail solutions that would address the off-system riding concerns identified in the Forest Plan. As Forest Plan implementation moves toward a Forest-wide closure order for off-system riding, it is critical that recreation management and partners be included in planning and implementation of the timber Activities in this AOI. So far that has not happened.

#### GAP\_AOI\_ID = GRF33 & GRF34 (Dobson Knob) and GRF72 (opposite USFS Woodlawn Work Center)

The draft EA is too unclear to provide more specific and meaningful comment, but it seems likely that timber actions in these three AOI's will generally have a negative impact both on the visit experience and the repair and maintenance burden of the Mountains-to-Sea Trail in this area. Implementation should include resources for restoration of trail infrastructure damage. Recreation management and the Friends of the MST trail maintenance partner organization should be included in planning for these AOI's. So far there is no evidence that they have been.

### APPALACHIAN TRAIL AOI'S

Quite a few AOI's on the App show timber activities adjacent to or surrounding sections of the Appalachian Trail. Because the draft EA does such a poor job of explaining what actions are being proposed, it is hard to know what exactly is planned for this nationally important recreation value. If no buffer and/or other conservation measures are to be implemented - or if the Forests simply don't possess the good judgment to throttle down timber activities in the vicinity of this narrow corridor - then what we have here is not only a management failure, but an unfortunate tarnishing of GAP's fast-tracked approach to project planning.

### HERITAGE SITES

Numerous heritage sites fall within GAP's AOI's, including timber Activity areas. Understanding that archaeology review is challenging, partners and public stand ready to contribute capacity toward identification of such sites. Generally, the concern is confined to the immediate vicinity of heritage sites, and the desire is for appropriate site

buffers to prevent damage to remaining artifacts.