

Data Submitted (UTC 11): 8/13/2024 2:38:56 AM

First name: Bruce

Last name: Fulford

Organization:

Title:

Comments: GAP Project Comments

Bruce R. Fulford

Natasha Shannon Harvey

Kenneth V. Harvey

306 Firefly Rd.

Burnsville NC 28714

August 12, 2024

As resident stakeholders who live in the South Toe Valley, we broadly support the goals, objectives, and proposed activities on most of the locations outlined in the GAP project proposal. It is a well-conceived, detailed and forward-thinking project with many variables to balance in addressing immediate and long-term forest health and wildfire risk.

The Final Nantahala and Pisgah National Forests Land Management Plan (USDA-FS R8 MB-160 January 2023) describes a comprehensive process and approach to forest stewardship. It incorporates historic indigenous forest management practices and practitioners, diverse stakeholder input, socioeconomic considerations, climate resilience, and data and experience derived from similar projects. The FLMP draws on USGS database, qualified subject matter expertise, and defines hydrologic disturbance risk mitigation measures and timelines for monitoring, assessment and adjustment. It also acknowledges water quality and storm event volume impacts from logging, development and other ground disturbance actions (bladed fire lines, skid roads, temporary roads, log landings) in the affected watersheds. The downstream impacts of reducing the absorptive, filtration and capacity of the watershed, and mandated erosion and sediment controls and other watershed Best Management Practices (BMP's) have been addressed in some detail.

However, we are concerned that the GAP Project will exacerbate the increasingly impaired health and climate-resilience of sensitive watersheds within, adjacent to, and downstream of USFS forested land identified in the Grandfather, Appalachian, and Pisgah Restoration documents we've reviewed.

Riparian and upland ecozones will also be profoundly impacted in some of the areas identified for commercial timber harvest, including disruption of rare and threatened wildlife habitat and plant communities. We are concerned that sensitive and irreplaceable ecosystems and biological communities be protected in the process of implementing the Project.

There will invariably be a significant increase in the volume and velocity of surface water runoff from portions of the forested lands delineated for commercial harvest and managed via cutting and controlled burns in the GAP Project. Coupled with the development of temporary road access and other soil disturbance actions associated with timber harvesting and vegetation management, thousands of acres of watershed that is currently buffered by tree canopy, understory, and forest floor ecosystems will be exposed to predictably more frequent, severe and erosive weather events for years. Evapotranspiration rates for the affected watershed will be diminished by the reduction of established living canopy and understory vegetation. This further reduces the stormwater buffering capacity of currently forested land until regrowth offsets losses from actions proposed during the GAP Project.

Recent timber harvest from hundreds of acres of privately-owned forested land in the Toe River watershed between Buck Creek Gap and Busick has diminished the retention of water in this portion of the watershed. The

South Toe River has in the past two years experienced dramatically accelerated velocity and rapid rise in the elevation of the river, riverbank scouring, and severe turbidity during and immediately following heavy rains. This assessment reflects our personal observations between Busick and Hannah Branch Rd on Route 80 and separate stakeholder accounts shared by other Yancey County residents. Episodic logging-related erosion and sediment pollution of the South Toe River hasn't been this severe since portions of the Black Mountains were logged more than 50 years ago.

Site-specific BMP's and stormwater runoff mitigation measures referenced and proposed in the public documents relevant to the GAP Project including the LMP-FEIS (updated 7/12/24) will only safeguard soil and water quality and minimize flooding in the affected watersheds if they are correctly engineered, deployed, monitored and maintained when and where needed.

The FLMP implies that whole-watershed modeling and planning have accounted for the detrimental impacts of recent, current and future forest disturbance from commercial harvesting and development of private forest land in shared watersheds. We recognize that to achieve the long-term objectives of the GAP Project that we support, multi-faceted human intervention including commercial harvesting of forest products is required. The short-term environmental stressors and long-range benefits of the GAP project on the health and resilience of the watershed are additive, dynamic and sequenced.

Stormwater runoff from the proposed project will contain suspended solids, nitrogen, phosphorus and other water pollutants, and increase its biological oxygen demand (BOD). Reduced tree canopy will also increase the average temperature of waters flowing from the previously covered forest terrain, especially with a warming climate. We are concerned that existing water quality protection BMP specifications and Project budgeting of staff time and money may not adequately detain and treat the increased stormwater impacts associated with our changing climate.

Unless robust and targeted BMP's are implemented, maintained and monitored prior to, during and after land modification work the respective watersheds will be compromised to some extent. This would have a deleterious impact on native brook and stocked brown and rainbow trout, Eastern hellbender and other aquatic species reliant on clean and cold water. More frequent and severe storm events and downstream flooding will also result in losses of property, property value, flood plain damage, and generate additional water pollutants from agriculture, residential, and riparian zones adjacent to waterways.

The proposed GAP Project contains numerous critical elements of watershed and forest ecology protection that are broadly addressed in the Forest Management Plan and detailed in the LMP-FEIS. The relative ecosystem risks and costs of various vegetation management approaches on the specific land areas delineated in the GAP Project documents reflect generations of collaborative effort and collective knowledge from diverse stakeholders that have contributed to its development.

We strongly advocate for prioritization of key elements of the project that will effectively minimize soil erosion and non-point source pollution and runoff of stormwater from all delineated parcels, particularly in the proposed soil disturbance work zones and during phases of the project when scheduled actions pose the greatest immediate risk to the health of the watershed. These critical measures are referenced in the LMP-FEIS update 7/12/24.

It is unclear to what extent the systematic risk management process and essential resources identified in the relevant documents can be guaranteed during the proposed GAP project. The scope of work is to be managed, monitored and reported on by the USFS. High staff turnover rates, competing priorities, redeployment of staff, and budgetary constraints are factors likely to influence the capacity of the USFS to effectively manage tasks outlined in its scope of responsibility. We respectfully request responses to the following specific questions:

- 1) How will costly and effective BMP's be prioritized and their installation, maintenance and performance

evaluation funded?

- 2) What criteria are used to award contracts for the proposed commercial timber harvest?
 - a) Will environmental compliance track-records be considered in selecting contractors?
 - b) Will commercial harvesting contracts be awarded on a low-bid, or net-cost basis?
- 3) Can time-sensitive and qualified monitoring, performance validation, and maintenance of BMP's be assured throughout the project?
- 4) Will qualified staffing be available to perform critical oversight of all soil disturbance actions.
- 5) Will planned and contracted activities including temporary road construction and commercial timber harvest be suspended if critical oversight by USFS or qualified contracted 3rd party manager(s) cannot be assured?

Thank you for the opportunity to comment on this ambitious and important initiative.