North Carolina Backcountry Hunters & Anglers
"The sportsmen's voice for our wild public lands, waters, and wildlife"
www.backcountryhunters.org

Lisa Jennings
Recreation and Trails Program Manager
Grandfather Ranger District
USDA Forest Service
109 East Lawing Drive
Nebo, NC 28761

26 March 2021

Dear Ms. Jennings,

On behalf of the North Carolina chapter of Backcountry Hunters & Anglers, thank you for the opportunity to comment on the Old Fort Trails Project #59242. BHA celebrates our shared appreciation and stewardship of America's national forests. We commend the Forest Service's ongoing commitment to manage the Grandfather Ranger District of Pisgah National Forest in a way that strikes a balance between what is right for the ecosystem and its wild inhabitants and the utilization of that ecosystem by a multiplicity of human user groups.

Backcountry Hunters & Anglers works hard every day to broaden our constituency by finding occasions to collaborate with and support outdoor enthusiasts who find solace and communion with nature through activities other than hunting and fishing. To be sure, thousands of our members enjoy pursuits like mountain biking and hiking in addition to hunting and angling. What's more, it is only through cooperation that we can all ensure the permanence of our wild places.

To that end, our organization acknowledges the diligence with which this project was conceived and planned, and the significant public input collected by the Forest Service from community members in the town of Old Fort and in McDowell County at large as well as certain stakeholder organizations keen on seeing this project completed.

One of BHA's mission pillars is *access & opportunity* for the hunter and angler. We are pleased that many aspects of the Old Fort Trails Project are likely to increase access for our constituents. Nonetheless, we are concerned about detriment to opportunity. Further, a second of our pillars is *habitat*, and pivoting there we have additional concerns.

It is worth noting now, however, before we get into what those concerns are, we believe there are many and varied viable solutions that will ameliorate if not eliminate the potential negative outcomes we envision in regard to (1) forest management practices aimed at significantly increasing early successional habitat; (2) stream sedimentation; (3) impact on wildlife behavior due to increased recreational use; (4) inability for WRC to maintain wildlife openings in the area; and (5) misuse and ongoing maintenance of trails.

Attached as an addendum to this letter is our North American Policy Statement on the Management for Diverse Successional Stages in Eastern U.S. Forests. As you can appreciate, as areas of forest are developed for recreational uses such as mountain biking and hiking there is a negative correlation in management practices that are aimed at increasing habitat and wildlife populations—practices that Pisgah National Forest is in dire need of augmenting. We want to be sure that the Forest Service takes this into consideration and actively plans for implementing such management practices in the immediate area.

Streams within the proposed plan hold healthy populations of wild trout and are relied upon by conscientious, dedicated anglers. Most notably here are Curtis Creek and Newberry Creek. Parking, equestrian usage (particularly watering sites), mountain biking, foot traffic, and trail development can have severe consequential impacts to aquatic life and water quality. Every effort must be made to mitigate or eradicate these threats during development and in perpetuity thereafter. Moreover, continuous monitoring and reaction mechanisms to water quality changes must be in place.

This tract of Pisgah National Forest is part of the oldest acreage of public land in the Eastern U.S. dating back to the Week's Act of 1911 and home to the Mt. Mitchell Bear Sanctuary, one of only a few black bear population epicenters in the state of North Carolina. Hunters have been plying these hills for generations in pursuit of black bear, whitetail deer, grouse, turkey, and more. Invariably, human presence impacts wildlife from behavior to movement to stress levels. In discussions with the North Carolina Wildlife Resource Commission, there is concern that the negative impact on wildlife behavior in the area and increased usage will negate efforts to maintain established wildlife openings there. Consideration must be given to these efforts. Further, if any openings are lost or expected to be lost then there must be replacement areas of equal or greater value installed in the most immediate viable area adjacent to the trail development project.

Finally, methods to prevent and deter misuse of the proposed trails must be clearly spelled out and monitored. Further, plans and means for the ongoing maintenance of these trails is critical. The Forest Service in conjunction with partnerships with state agencies and nonprofit and community organizations can help ensure users hold stewardship and responsible use as guiding principles.

NC BHA truly appreciates the opportunity to comment on the Old Fort Trails Project #59242. We remain a steadfast partner to the Forest Service in the conservation and stewardship of our public lands and waters.

Sincerely,

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BACKCOUNTRY
HUNTERS & ANGLERS

2020 NORTH AMERICAN POLICY STATEMENT: MANAGEMENT FOR DIVERSE SUCCESSIONAL STAGES IN EASTERN U.S. FORESTS

Purpose: The intent of policy statements is to provide a formal mechanism for Backcountry Hunters & Anglers to engage in specific conservation issues while establishing clear policy direction that not only defines the parameters of our position statements but the relevance to our mission. As declarations of policy, statements do not direct specific actions, establish policy priorities or allocate BHA resources.

Sponsored by: The Georgia, North Carolina, Tennessee, West Virginia, New York, and New England Chapters of BHA.

North American Board Action: Adopted on February 8, 2021

North American Policy Statement:
Backcountry Hunters & Anglers supports the science-based management of Eastern U.S. Forests to maintain a diversity of forest age-class structures which in turn will promote forest health and habitat suitable for native wildlife populations. BHA encourages federal and state agencies to incorporate and implement management practices to maintain diverse forest age classes, ranging from early successional to old growth. To accomplish this goal, BHA recommends that federal and state agencies:

- Use State Wildlife Action Plans as the basis for developing management goals and for developing long-term habitat management plans with specific habitat type and age-class targets.

- Apply information on natural disturbance regimes to guide the size, arrangement, and structure of habitat management units, modified as applicable in response to wildlife habitat management goals and to factors such as climate change, invasive species, and diseases.

- Include and implement prescribed fire as a management tool in fire-dependent forest communities that simulates historic disturbance regimes in factors such as size, intensity, seasonal timing, and frequency.

- Use timber harvest to replace natural disturbances that no longer function as they did historically, such as stand replacing fires, beaver activity, and weather events.

- Recognize the importance of intact lands and waters managed under designations like Wilderness, Roadless Areas, and Wild and Scenic Rivers while addressing the need for active management in other landscapes in order to ensure healthy forest structure and the health of wildlife populations that require early successional habitat for some or all of their life cycles.

- Implement an education and outreach effort to inform stakeholders on the importance of science-based forest management to achieve wildlife habitat objectives for the full suite of species and habitats