Data Submitted (UTC 11): 3/22/2022 4:00:00 AM
First name: Esther
Last name: Manheimer
Organization: Asheville City Council / City of Asheville
Title: Mayor
Comments: The City of Asheville's objection to the Nantahala Pisgah Forest Plan is attached.

UNITED STATES OF AMERICA DEPARTMENT OF AGRICULTURE

UNITED STATES FOREST SERVICE

March 22, 2022

Objection to the Revised Nantahala and Pisgah Forest Plan Final Environmental Impact Statement and Draft Record of Decision

OBJECTOR

Asheville City Council Esther Manheimer, Mayor 70 Court Plaza

Asheville, NC 28802 AshevilleNCCouncil@ashevillenc.gov

NOTICE OF OBJECTION AND STATEMENT OFREASONS

Submitted via electronic portal:

Nantahala and Pisgah National Forests Plan Revision Objection

Ken Arney Regional Forester

USDA Forest Service Southern Region

1720 Peachtree Road NW Suite 760S

Atlanta, GA 30309

James Melonas Forest Supervisor

United States Forest Service ATTN: Objection Coordinator 160 Zillicoa Street, Suite A

Asheville, NC 28801

cc: Randy Moore, Forest Service Chief, U.S. forest Service Headquarters, 1400 Independence Avenue, SW, Washington, D.C., 20250-0003

NOTICE OF OBJECTION

Pursuant to 36 C.F.R. [sect] 219, Subpart B, the above party objects to the Nantahala and Pisgah Revised Forest Plan Final Environmental Impact Statement and Draft Record of Decision. The Responsible Official is James Melonas, Forest Supervisor, and the Reviewing Officer is Ken Arney, Regional Forester. The Nantahala and Pisgah Revised Forest Plan Final Environmental Impact Statement and Draft Record of Decision were published on January 21, 2022, with public notice appearing in the Asheville Citizen Times, initiating a 60-day objection period. This objection is timely.

PREVIOUS COMMENTS

The Asheville City Council has submitted previous substantive formal comments during public comment periods for the Nantahala and Pisgah Forest Plan. The previous comments were within the scope of the proposed plan, specific to the plan, and had a direct relationship to the plan.

Specifically, the Asheville City Council submitted a unanimous bipartisan resolution supporting the protection of the entire Craggy/Big Ivy area, including the Ivy Knob, Snowball Mountain, Ox Creek, and Shope Creek portions. It highlighted the widespread public support and the long hist01y of local community support for protecting all of Big Ivy. Asheville City Cotmcil supported the protection of the entire Big Ivy area not only because of its incomparable scenic value, but also because of the entire area's importance for protecting water quality, its old-growth forests and other biological values, and its

world-class recreational setting and experience.

The Asheville City Council resolution passed in 2017 included detailed and substantive comments describing the unique conservation attributes of the Craggy/Big Ivy section of Pisgah National Forest. These attributes were neither protected nor analyzed in the Draft

Record of Decision and Final Environmental Impact Statement. Additionally, lhe Forest Service chose not to even study the Craggy National Scenic Area proposal recommended by the Buncombe County Commission, but offered no explanation for this decision.

SUMMARY OF OBJECTION

Asheville is the most populous city within the 18-county footprint of the Nantahala-Pisgah Forest Plan. Asheville is also the county scat of Buncombe County, which has the most forest users of any county in the Pisgah-Nantahala National Forest region. The City of Asheville has significant interest in the outcome of the forest plan. The City is surrounded on tlu[middot]ee sides by Pisgah National Forest. Asheville's water quality, air quality, and scenic views are especially important to Asheville residents and visitors.

Asheville's economy is especially dependent on recreation, tourism, and scenery. The Blue Ridge Parkway passes directly through Asheville, and Craggy Gardens is jnst 15 miles from downtown Asheville. Craggy Gardens is the most popular and photographed spot along the Parkway and an important part of Asheville's recreation and tourism. Over 500,000 visitors travel to Craggy Gardens each year for its scenic views.

The Craggy/Big Ivy section of Pisgah National Forest comprises most of the viewshed from Craggy Gardens and over seven miles of the most popular stretch of the Blue Ridge Parkway. The Craggy/Big Ivy section of Pisgah National Forest also provides the drinking water for the rapidly growing town of Weaverville and interconnects with Asheville's water system.

The Craggy/Big Ivy section of Pisgah National Forest is also home to the last old-growth forests near Asheville. Over 1,500 acres of these ancient forests have been placed in management areas considered "suitable for timber production," where the Forest Service has prioritized logging.

The plan states, noteably, that future projects will not be proposed for the "primmy" purpose of timber production, but makes clear that logging and road construction would nevertheless occur in order to meet both acreage and timber volume targets. The plan does not provide guidelines requiring the protection of old growth, rare biological values, or unroaded areas within areas considered suitable for timber production.

Asheville is also home to the largest Black and Hispanic population in the 18-county

Pisgah-Nantahala National Forest footprint. The Forest Plan does not consider these communities as environmental justice communities, and fails to consider the impacts of quadrupling timber harvests on the air, water, climate, and health of these communities.

The Forest Service failed to consider the impact of its management allocations on the city of Asheville. It failed to properly analyze as a reasonable alternative the protection of the entire area for its scenic, water, biological, and recreational values, including over 4,000 acres in the Ivy Knob, Snowball Mountain, Ox Creek, and Shope Creek portions of the Craggy/Big Ivy section of Pisgah National Forest. The Forest Service also failed to include these key conservation and recreation areas in its Forest Scenic Area designation. The Forest Service also failed to fully consider and analyze the proposed Craggy National Scenic Area with embedded wilderness designation for an expanded Craggy Mountain Wilderness Area.

The City of Asheville seeks a change to the final plan that would include those 4,000 acres of Snowball Mountain, North Fork, Shope Creek, and Ox Creek in its Forest Scenic Area and fully consider recommending the proposed Craggy National Scenic Area.
REASONS FOR OBJECTION

The 16,000-acre Craggy/Big Ivy section of Pisgah National Forest is a unique and special section of the Pisgah Nantahala National Forest that has widespread public, political, stakeholder, and local community support to be designated a Craggy National Scenic Area.

The Craggy/Big Ivy section of Pisgah National Forest includes world-class trails, waterfalls, panoramic views, trout streams, and ancient forests-just 15 miles from downtown Asheville,

N.C. Craggy is one of the largest old-growth forests in the East, home to dozens of rare and endangered species. It also boasts some of the steepest downhill mountain biking and best trail running in the country. Climbers ascend sheer granite faces, and hikers trek beneath ancient trees and emerald spruce-fir forests.

The 1,000-mile Mountains to Sea Trail-North Carolina's state trail, stretching from the Smokies to the Outer Banks-rolls along Craggy's ridgeline. Craggy/Big Ivy also includes the mile-high, 360-degree views from Craggy Gardens and Craggy Pinnacle along the Blue Ridge Parkway.

Water abounds in Craggy, including 70-foot Douglas Falls. Native brook trout shelter in cold headwater streams, which supply drinking water to Weaverville, a neighboring municipality whose water use affects and connects with Asheville's water infrastructure.

The Craggy/Big Ivy section of Pisgah has superlative scenic character and integrity with recreational and

economic importance. Over 500,000 visitors per year enjoy this area's scenic grandeur from the Blue Ridge Parkway. Around 5,000 drivers each day are greeted by the Craggy viewshed as they travel to Buncombe and Madison Counties from the north. 92% of the proposed Craggy National Scenic Area is visible from just a few popular and close-by vantage points and the immediate quarter-mile foreground of roads and trails.

Craggy/Big Ivy is surrounded by over 100,000 acres of protected wildlands, including national parklands, private conservation easements, state parklands, and two protected municipal water supplies.

Craggy/Big Ivy includes nearly 5,000 acres of State Natural Heritage Areas and a designated Research Natural Area. Craggy/Big Ivy also features some of the region's best examples ofrich cove forest. Nearly every major ecozone occurs in Big Ivy, from sprnce-fir forest to bottomland wetlands.

Over 10,000 people submitted comments to the U.S. Forest Service in support of the Craggy National Scenic Area. The Craggy National Scenic Area has also received unanimous bipartisan resolutions of support from the Buncombe County Commission and Asheville City Council, and over 150 local businesses and organizations support the Craggy National Scenic Area. In addition, the full Craggy National Scenic Area also has the full and immediate endorsement of the Nantahala-Pisgah Forest Partnership-a coalition of30 diverse organizations who have been working together to find common ground on the Pisgah-Nantahala National Forest since 2013.

The Nantahala Pisgah Forest forest plan excludes 4,000 acres of Craggy and places it in its highest-priority logging designations. These highest-priority logging areas in Craggy/Big Ivy include 1,500 acres of old-growth forest, the headwaters of the Ivy River (the drinking water source for the town of Weaverville), and the Snowball Trail, one of the most popular trails along the Blue Ridge Parkway. However, the Craggy National Scenic Area designation was dismissed.

The best and highest use of Craggy/Big Ivy is as a Forest Scenic Area/National Scenic Area that protects this world-class viewshed, ancient forest, rare species refuge, drinking water source, and recreational hub.

A. The Forest plan failed to properly analyze 4,000 acres of Craggy/Big Ivy.

The U.S. Forest Service failed to adequately analyze 4,000 acres of the most important recreation and conservation areas in the Craggy/Big Ivy section of Pisgah National Forest.

The Matrix Management Area designation for 4,000 acres of Craggy undervalues multiple detailed comments from biologists, botanists, recreation leaders, and the local community highlighting the Forest Service's inadequate assessments of the Snowball, North Fork, Shope Creek, and Ox Creek sections of Craggy.

Instead, the Forest Service delineated a scenic area based on a desktop analysis of visibility from a portion of the Blue Ridge Parkway. The Forest Service did not consider scenic integrity based on other significant vantage points, even though a field-verified scenic viewshed analysis was available and submitted along with Buncombe County's resolution. Moreover, the Forest Service failed to consider the importance of the full area for protecting water resources, biological values, and recreation.

The analysis of Craggy failed to include any consideration of the following key attributes of the 4,000 acres placed in Matrix Management Area:

I .The Craggy/Big Ivy area is part of a contiguous block ofwildlands that include the North Fork Reservoir, Asheville's primary drinking water supply source. Protection of the Ivy River headwaters.

1. The unprotected portions of Craggy/Big Ivy include 1,500 acres of old-growth forests.
2. The unprotected portions of Craggy/Big Ivy include habitat for federally listed endangered species and species of conservation concern.
3. Four North Carolina Natural Heritage Areas are within or adjacent to Craggy.
4. The scenic values and recreational opportunities of the Snowball Trail and Mountains to Sea Trail were not adequately valued.
5. The significance of the Little Snowball Fire Tower Heritage Site was not included in the analysis.
6. Shope Creek contains old-growth forest and growing recreation use
7. Ox Creek shares a boundary with the Town of Woodfin Watershed and contains a portion of the Mountains to Sea Trail.

10. The City of Asheville is part of unanimous local, political, stakeholder, and public

support for protecting all of Craggy. 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/Big Ivy Community Center in Febrnary 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 in the parking lot on a cold winter evening for the opportunity to express their support for protecting the Craggy/Big Ivy section of Pisgah National Forest.

Despite this clear mandate from the local community, political leaders, stakeholders and the public, the FEIS and ROD place over 4,000 acres of Craggy in the Matrix and Interface Management Areas, which are the highest-priority timber production designations..

The Forest Plan offers no explanation for excluding 4,000 acres of Craggy/Big Ivy and placing it in timber production management. The Forest Service provides no discussion anywhere in the ROD, FEis, or Appendices for how it decided to exclude 4,000 acres of Craggy from Forest Scenic Area protection. It also provides no explanation for why it placed Snowball, Ivy Knob, Shope Creek, and Ox Creek in its highest priority logging designations.

Only one sentence in the entire 1,500-page document indirectly addresses the exclusion of 4,000 acres of Craggy:

A portion of the Big Ivy area north of SR 197, and the westem part of the Snowball Mountain area [middot]will be managed as A1atrix and lnte1face MAs, allowing for vegetation management consistent with those MAs" (Appendix A, p. 167).

This analysis appears to be insufficient. A decision based on this conclusory statement would be wholly inadequate.

The City of Asheville urges, in the alternative, in conjunction with complete local, public, political, and stakeholder support, to include the entire Craggy/Big Ivy area, including Ivy I(nob, Snowball Mountain, Ox Creek, and Shope Creek in the Forest Scenic Area designation.

B. The Forest Service failed to study the Craggy National Scenic Arca proposal, the most popular and publicly supported portion of the entire Nantahala Pisgah Forest Plan.

The Forest Service chose not to analyze the proposed Craggy National Scenic Area in the

final forest plan. The Craggy National Scenic Area proposal received more public, political, community, business, and stakeholder support than any other component of the Nantahala Pisgah Forest Plan. The U.S. Forest Service received an unprecedented, record-setting number of comments on the Nantahala Pisgah Forest Plan. Over 22,000 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 supported stronger and more permanent protections for the most important recreation and conservation areas in the Nantahala Pisgah National Forest.

Over I 0,000 public comments-nearly half of all comments submitted on the Nantahala Pisgah Forest Plan-supported the complete Craggy National Scenic Area.

Asheville City Council has passed a unanimous bipartisan resolution supporting the Craggy/Big Ivy. Buncombe County Commission has also passed a unanimous bipartisan resolution supporting the Craggy National Scenic Area. In addition, the Nantahala Pisgah Forest Partnership has endorsed the protection of all of Craggy/Big Ivy as a wilderness and national scenic area. Over 150 local businesses and organizations have also endorsed the entire Craggy National Scenic Area.

Despite this clear mandate from the local community, political leaders, stakeholders and the public, the Forest Service 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 adequate explanation.

The Forest Service failed to fully analyze the proposal with the most widespread public, community, political, and stakeholder support, and it offered no concrete explanation or analysis in the Forest Plan for this decision.
REMEDIES AND REQUEST FOR RELIEF

The City of Asheville-the most populous city in the Pisgah-Nantahala footprint and home to the largest number of forest visitors-passed a unanimous bipartisan resolution supporting the protection of Craggy/Big Ivy that was not honored by this forest plan. The Forest Service failed to adequately value the 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 City of Asheville strongly urges the Forest Service to amend its plans to include all of Craggy/Big ivy, including Snowball Mountain, Nmth Fork, Shope Creek, and Ox Creek, in its Forest Scenic Area, and to study and recommend the Craggy National Scenic Area with the expanded wilderness area described in that proposal.

Signed,

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March 22, 2022

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Record of Decision and Final Environmental Impact Statement. Additionally, lhe Forest Service chose not to even study the Craggy National Scenic Area proposal recommended by the Buncombe County Commission, but offered no explanation for this decision.

SUMMARY OF OBJECTION

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A. The Forest plan failed to properly analyze 4,000 acres of Craggy/Big Ivy.

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The Forest Service chose not to analyze the proposed Craggy National Scenic Area in the

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Despite this clear mandate from the local community, political leaders, stakeholders and the public, the Forest Service 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 adequate explanation.

The Forest Service failed to fully analyze the proposal with the most widespread public, community, political, and stakeholder support, and it offered no concrete explanation or analysis in the Forest Plan for this decision.

REMEDIES AND REQUEST FOR RELIEF

The City of Asheville-the most populous city in the Pisgah-Nantahala footprint and home to the largest number of forest visitors-passed a unanimous bipartisan resolution supporting the protection of Craggy/Big Ivy that was not honored by this forest plan. The Forest Service failed to adequately value the 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 City of Asheville strongly urges the Forest Service to amend its plans to include all of Craggy/Big ivy, including Snowball Mountain, Nmth Fork, Shope Creek, and Ox Creek, in its Forest Scenic Area, and to study and recommend the Craggy National Scenic Area with the expanded wilderness area described in that proposal.

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