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First name: Hugh

Last name: Irwin

Organization: The Wilderness Society

Title: Senior Conservation Specialist

Comments: March 22, 2022

Ken Arney

Reviewing Officer for Land and Resource Management Plan

Responsible Official for Species of Conservation Concern

Regional Forester

U.S. Forest Service, Southern Region

James Melonas

Responsible Official for Land and Resource Management Plan

Forest Supervisor

National Forests in North Carolina

Randy Moore

Reviewing Officer for Species of Conservation Concern

Chief

U.S. Forest Service

Submitted electronically via CARA Online Portal:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=43545>

Notice of Objection to the Final Land Management Plan

for the Nantahala and Pisgah National Forests

Objector Contact Information:

Pursuant to 36 C.F.R. [sect] 219.54 (c)(3) Hugh Irwin, Senior Conservation Specialist, is designated as the lead objector.

Hugh Irwin

Senior Conservation Specialist

I am filing this objection to the Final Land Management Plan for the Nantahala and Pisgah National Forests, the Final Environmental Impact Statement, and Draft Record of Decision on behalf of The Wilderness Society (TWS). James Melonas is the Responsible Official for Land and Resource Management Plan and Ken Arney is Responsible Official for Species of Conservation Concern. Address, phone number, and email address are above. I designated myself as the lead objector on behalf of The Wilderness Society.

I have been directly involved as a representative of the Wilderness Society in the Nantahala and Pisgah plan revision process since it began. I participated in the Nantahala-Pisgah Stakeholder Forum and the Nantahala-Pisgah Forest Partnership throughout their histories. I have provided extensive comments on planning issues throughout the planning process on behalf of TWS.

TWS has been very interested in and has provided comments on NRV and Spectrum models used in the planning process; the allocation of Wilderness Inventory Areas, the allocation of old growth; the allocation of NC State Natural Areas; biodiversity and rare species protection; wilderness and special area recommendations; addressing climate change and carbon storage on the Forest; transportation issues; water quality issues; and soil issues.

Despite extensive participation in the planning process, TWS is not satisfied with the adequacy and accuracy of the models used for analysis in the EIS. We are also not satisfied that allocations based on these models adequately address ecological sustainability, biodiversity needs, the needs of rare species, climate change, the need to store carbon, adequate transportation planning, water quality issues, and soil conservation issues.

As my statement of reasons for objecting, suggested remedies, and demonstration of the link between my prior substantive comments and the content of my objection, I am incorporating the objection filed today by the Southern Environmental Law Center on behalf of The Wilderness Society, MountainTrue, Defenders of Wildlife, and Sierra Club. In the past when groups have joined in a single objection, the Forest Service has only allowed one member of the group to participate in objection resolution meetings. This is unfair[mdash]particularly here, where I have been working on the forest plan revision for nearly a decade. I am filing this additional objection to preserve my ability to participate in the objection resolution meeting.

Sincerely,

Hugh Irwin