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Organization:

Title:

Comments: I am providing substantive comments to the Lickstone Project Scoping

Pisgah National Forest Lickstone Project Scoping Comments06-27-2022To Whom it May Concern,Please accept these substantive comments regarding scoping of the Lickstone Project, withinHaywood County on the Pisgah Ranger District of the National Forests of North Carolina. I have summarized my comments on major topics in this document. I am providing also a copy of theLickstone Proposed Action Scoping document in Adobe PDF form with my comments on specificaspects of the document. I have done this to facilitate the USFS response to my comments hopefullydirectly within the document so improve our communication on these topics and to make it easier forother interested individuals to read and understand my comments and the USFS response.PURPOSE AND REASON FOR ACTIONThe scoping begins by describing the goals and objectives and placing the context of the projectwithin the North Slope Geographic Region. The NPFP identified goals for the region which includerestoring diverse forest structure and age classes outside of designated wilderness areas. USFS landsin North Slope total 37,913 acres with 26,400 acres being in wilderness and 11,500 acres outside ofwilderness. Lickstone project area comprises 9,105 of the acres but only about 7,800 acres areoutside the wilderness. Under [lsquo]Needs[rsquo] the scoping discusses Geographic Area Departure Analysis andthe need to move structure classes towards the Natural Range of Variation (NRV). Appendix Cprovides the analysis. It is unclear whether Appendix C is based on an analysis considering the wholeNorth Slope region (37,913 acres) or only Lickstone (7,800). Does the table consider all the 37,913acres of USFS lands in North Slope and then assess +/- the NRV of Lickstone against all those acres?Considering that none of the wilderness acres can be managed for NRV it makes no sense to use those acres when assessing Lickstone but it isn[rsquo]t clear if this is or is not the case. In either case theNPFP Land Management Plan states (Chapter 2 page 50) [ldquo]For this forest plan, NRV was used to understand landscape ecological integrity and does not constitute a management target. NRV is to be used at the landscape scale and should not be evaluated at the project scale.[rdquo]WATERThe Lickstone Project area encompasses over 9,105 acres in the westernmost portion of the PisgahDistrict and is adjacent to Shining Rock and Middle Prong Wilderness Areas. The project area is bordered on the west by Lickstone Ridge which runs from Richland Balsam north to Beaty SpringKnob and is bordered on the east side by NC215 and the Pigeon River. Within the project area thereare headwaters of numerous large watersheds, notably Right Hand Prong, Boomer Inn Branch, BigCreek, McClure Creek, Nick Creek, Sam Branch, and Poplar Branch . The project encompasses thewestern half of the NHD WBDHU12 Region Lake Logan West Fork Pigeon River and the Northwesternportion of WBDHU12 Region Little East Fork Pigeon River - West Fork Pigeon River. All waters fromthe project area are within HBDHU10 Region Headwaters Pigeon River. Historically, the Pigeon Riverhas had extreme flood events and in 2022 it narrowly missed the most severe flooding of Fred whichcentered over the Blue Ridge just east of the West Fork of the Pigeon River and caused significantflooding and loss of life along the East Fork of the Pigeon River.The most current National Hydrologic Dataset is outdated and significantly underestimates the riparianresources within the project area. This is easily seen by comparing NHD flowline density fromsurrounding watersheds to the south and east.Pisgah National Forest Lickstone Project Scoping Comments06-27-2022The scoping makes little mention of riparian resources and no details about numbers of streamcrossings or other riparian considerations in any road or treatment analysis or description. TheLickstone Proposed Action Map does not provide accurate stream information. Stream crossings notonly add to initial costs but also to long term maintenance and stream crossings introduce significantlong-term risk to water quality and aquatic organisms and fish habitat. Timber harvesting isheadwaters coves can dramatically change the amount of surface water during storms and can causesignificant alteration of established stream channels.The USFS has stated that their hydrology maps are the most accurate available, yet they have neverpublished these maps nor did they use them for maps in this project. The GIS data provided does notinclude base maps and does not include riparian resources specifically.The project scoping includes over 6 miles of new system roads but excludes any analysis of impactson riparian resources. This lack of information makes it impossible to comment on the roads otherthan to object to all of them without much more detail regarding riparian crossings, long-

term maintenance, estimated costs, miles of temporary roads, etc[hellip]In my objection to the NPFP I provided a comparison of current NCOneMap hydrology data with NPFP Hydrology data for the Lickstone Project area. The USFS data used for the NPFP estimated 23.8 miles of perennial and intermittent streams and 523 acres of riparian buffers. The NCOneMap data shows 30 miles of perennial streams and approximately 17 miles of intermittent streams. The riparian buffer is 1,144 acres. These differences are quite significant and without understanding the maps used for scoping nor having ever seen any more accurate maps from the USFS than what was used in the NPFP there is simply no way to assess whether the scoping has considered the full extent of riparian resources, the risks of damage or degradation, nor the costs associated with road building and timber harvesting.

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ROADS

The Nantahala Pisgah Forest Plan (NPFP) Final Environmental Impact Statement (FEIS) provides a summary of estimated road construction for Tier 1 and Tier 2 objectives. For Tier 1 all alternatives were similar, with regard to annual road building. Pages 3-496-497 FEIS To accomplish Tier 1 objectives, it is assumed that current trends for transportation system management activities continue, where 6.0 total additional miles of road will likely be needed annually, including 1.2 miles of new road prism construction, 1.9 miles of existing road prism added to the system, and 2.6 miles of temporary road construction that is decommissioned after use. Tier 2 Objectives are provided in Table 196

The Lickstone Project scoping provides no detail on whether the projected road building is to satisfy Tier 1 or Tier 2 objectives, but Tier 2 objectives should not be in scope without any Tier 1 objectives

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having been reached. The Tier 1 annual road building objective is 6.0 miles. This single project requires the entire annual [lsquo]budget[rsquo] of new roads. Since the scoping makes no estimate of temporary roads it is not possible to assess how much of the annual temporary road [lsquo]budget[rsquo] the Lickstone Project will consume. The Crossover project is also currently in scoping and while there is not a specific mileage provided it does say [ldquo]Some reconstruction and maintenance of the existing network of system roads may be necessary and new temporary road segments are proposed to access a number of areas proposed for treatments. [rdquo] The Crossover scoping further notes [ldquo]If rights-of-way are secured, the Forest Service may propose adding some segments of Level 1 road to the permanent transportation system to provide long-term access to this part of the forest. This would require a Transportation Analysis Process (TAP). [ldquo] So, even before the NPFP is finally approved the USFS is proposing to exceed annual permanent and temporary road mileage in just two projects. The USFS should provide information about road building with reference to the stated goals and objectives in the 2022 NPFP so that the USFS and the public can assess how well the USFS is adhering to the plan. Road building should explicitly be monitored and reported on in context to stated estimates in the NPFP. When more than one project is in scoping then the USFS should provide a summary for all projects.

In Appendix F the Scoping document provides a table of proposed changes to National Forest System Roads (NFSR). In Appendix D the Scoping document provides a table of proposed actions. Road changes and proposed actions are not two distinct aspects of the plan - they are absolutely interrelated. These two tables should at least be cross-referenced so that a reader can understand how much road building a specific action requires and conversely which action a specific road is required for. Road building should be considered only when there is significantly low risk and then only when there is significantly high benefit. To reiterate my prior comments on riparian resources, there is also no information about water crossings for each road. In many cases there are proposed actions which describe a need for long-term access to a stand or which actions will not yield a commercial harvest in the near-to-mid term. How will the roads required for these actions be maintained in the interim? There is already a huge backlog of deferred maintenance on existing roads and even major roads such as FR1208 (Yellow Gap Road) and FR471 (Cathys Creek Road) cannot be kept up to minimum standards. Road building should only be considered when there is an assurance that long-term maintenance can be accomplished and only when that long-term maintenance requirement does not take away from maintenance and/or reconstruction of current roads that are identified as deficient. It is simply not reasonable nor responsible for the USFS to consider any road building while they have such a huge deferred maintenance backlog and roads continue to be degraded by what are now normal rain events. The scoping references the 2003 Pisgah Nantahala Road Analysis Report. [ldquo]As a result of the transportation analysis process mandated by Subpart A of the Travel Management Rule, recommendations found in the Pisgah Roads Analysis Project (RAP) Report (December 2003) identify the most ecologically, economically, and socially sustainable transportation system in terms of access for recreation, research, and other land

management activities. The Pisgah RAP includes a few recommendations within the Lickstone Project planning area. This project will consider, analyze, and make a decision considering those recommendations, as well as more recent recommendations made by Pisgah National Forest resource specialist analyzed at the project level transportation analysis, some of which may supersede previous recommendations. [rdquo]Using a nearly 20 year old analysis to inform current decision making is necessary because the USFS has not performed any new analysis since 2003. The 2022 NPFP only commits to update the plan [lsquo]within 3 years [rsquo], which is wholly insufficient considering the importance of roads and the need for current assessment and analysis to inform project decisions. I have requested the Travel Management Atlas in the past (specifically while researching the NPFP) and been told there is not one available. But Pisgah National Forest Lickstone Project Scoping Comments 06-27-2022 such a document is required to be available to the public per Forest Service Manual 7700 - Travel Management 7710.45 7710.45 [ndash] Forest Supervisors Forest Supervisors are responsible for: 1. Developing and maintaining a travel management atlas for their unit and making it available to the public at the Forest Supervisor [rsquo]s Office (36 CFR 212.2(a); FSM 7711.1). I will continue to object to all new road construction until a current Travel Management Atlas can be provided for review and the USFS has updated its Travel Management Plan.

PROPOSED ACTIONS Beginning on Page 10 the scoping document provides Descriptions of Proposed Actions. [bull] Prescribed Burns [bull] Stand Improvement [bull] Stand Release [bull] Vine Control [bull] Midstory Removal [bull] Thinning [bull] Thinning from Below [bull] Free Thinning [bull] Two-Aged Regeneration Harvest [bull] Shelterwood with Reserves [bull] Overstory Removal [bull] Oak Shelterwood [bull] Clearcutting with Reserves [bull] Uneven-aged Harvest [bull] Group Selection [bull] Group Selection with Thinning [bull] Variable Retention of Irregular Shelterwood [bull] Woodland Management [bull] Other [bull] Permanent Wildlife Fields [bull] Improve Stream Crossings [bull] Ford [bull] Bottomless Arch [bull] Oversized buried bottom pipe

Appendix D lists various two-aged regeneration harvests specifically (i.e. shelterwood with reserves, oak shelterwood) but only lists uneven-aged harvest and not specific variations of that treatment. It also lists Midstory Treatment which is I suppose actually Midstory Removal but this is not clear. The terminology should be made consistent. The attached pdf document (commented version of the Lickstone Scoping) contains comments specific to various treatments. In particular, regarding uneven-aged harvests, the scoping states [ldquo]These methods include multiple commercial entries and a more robust road system. [rdquo] Other treatments also mention repeated or subsequent entry needs. The USFS should provide a timeline of Pisgah National Forest Lickstone Project Scoping Comments 06-27-2022 such future treatments, access, and related required maintenance of roads needed to facilitate these treatments. Further, the USFS should maintain a running list of future actions per each project so that the public can assess whether the USFS is able to manage the workload and manage stands for the full life of the scope discussed. The NPFP monitoring should include and report on metrics regarding the completion of planned future actions. It makes no sense for the USFS to propose actions for the purposes of a future benefit if they cannot assure that all actions up to the time of the future benefit can be completed in a timely manner. This is especially true for actions that require road building and then subsequently annual maintenance.

Opposition to Specific Actions and Treatments Lack of sufficient detail and lack of access for site research limits my ability to comment on every proposed action and I reserve the right to comment at a later date when more details may be provided and I have an opportunity to do site specific research. I do have comments on specific treatments. As I have stated previously I am opposed to all new road building and the project plan should contain more details about temporary roads. These units are just examples. I have similar comments about many other units.

NEPA Unit 5 - Uneven-aged, Commercial harvest, Mixed Skyline with tractor, Roads FR97G is realign of .65 miles and FR97W is .98 miles of new system road. Proposed treatment of 98 acres using Group or alternatively Group Selection with Thinning. It is unclear how much improvement will be needed on 97G and 97W is proposed to climb up from FR97 to the ridge line and then follow the ridge up and over a knob through a new proposed wildlife field. The first 1/4 of FR97W side-slopes a steep ridge of oak and hickory. Group treatment requires multiple entries and I question if this stand can ever be viable given how far it is to get there. The wildlife field (NEPA 87) will be located miles behind any vehicle access.

NEPA Unit 8 - Uneven-aged, Commercial harvest, Mixed Skyline with tractor, 97P (portion). Proposed treatment of 53 acres with Irregular Shelterwood. This unit is the headwaters of a small stream that flows under NC215 into the Pigeon River. Numerous old roads are throughout the stand from prior harvests. GIS comments that the entire unit might be tractor logged using these old roads. It is not clear what condition these roads are in or how much

[temporary road] would be needed. How would these old roads be managed in the future? NEPA Unit 9 - Uneven-aged, Commercial harvest, Mixed Skyline with tractor, 1.36 miles permanent road as FR97U. Proposed treatment of 116 acres with Irregular Shelterwood in a high elevation east facing cove. There are at least four significant stream crossings and one area that appears to be a spring/seep just above a tight curve. There are likely numerous small seeps and ephemeral streams in the stand. The cove is the headwaters of an unnamed stream that flows directly into Lake Logan. There is not sufficient detail to understand what exactly is planned, how much timber will be harvested and how much left, when a subsequent entry would be needed and thus how long will that road need maintenance. There is no detail provided on temporary road requirements. The stand has areas with steep slopes up to 40% and removing trees will significantly increase runoff quantity and velocity, potentially creating a landslide risk.

NEPA Unit 10 - Uneven-aged, Commercial harvest, tractor, miles permanent road as FR97T (1.02 miles), FR97F (.82 miles), FR97S (.77 miles) for 2.61 miles total. Pisgah National Forest Lickstone Project Scoping Comments 06-27-2022 Proposed treatment of 292 acres with Irregular Shelterwood in the watershed of Big Creek. Big Creek has numerous tributaries both large and small and this stand spreads across the whole bottom of the drainage. There are at least 22 perennial stream crossings on 2.61 miles of road. The old roads (existing corridor) are in poor shape and show significant degradation since past use. Several of the tributaries flow through narrow chutes and in several cases have already blown out past culverts. The bottom of the unit where all the tributaries join drains in total over 1,100 acres extending to elevations >5,500 ft on Lickstone Ridge. The potential for flooding, slides, and sedimentation cannot be overstated. Unauthorized access from Cold Mountain Game Lands is evident with user created dirt-bike trails and further [improving] the roads in this area will only add to the unauthorized use. Unless both the USFS and the NCWRC is committed to managing the area and preventing this unauthorized use there is significant potential for damage and illegal activities to occur [behind the gate]. I am opposed to adding new roads simply to create wildlife fields. There is simply too much deferred maintenance backlog to add new roads at this time.

NEPA Units 12, 14, 17, 19, 22, 23, 27, 29, 51 [hellip]. approximately 186 acres of Oak Shelterwood as commercial harvests. As I mentioned previously the USFS should provide a cross-reference for required roads per each treatment and a summary. With 9 different units it is cumbersome to determine how much new road is needed for these treatments. With only a generic description of the treatment it is difficult to comment on it. How much timber is removed in the first (this) treatment? How much BA is left standing? These are listed as commercial treatments so there must be enough timber harvested to make a sale. The treatment then prescribes a subsequent 10-15 year later commercial treatment. Do these stands already have all roads and access needed for that later harvest or would roads and access need to be maintained in the interim? How much temporary road is needed and what happened to it in the interim?

WILDLIFE FIELDS The scoping includes 12 wildlife fields and 12 acres. [Permanent Wildlife Fields: Fields will be created or expanded by removing trees and brush, tilling, and planting native and desired nonnative grasses and forbs. Fields will be maintained by tilling, seeding, mowing, and/or herbicide. Thinning around the edges of the fields may also occur to improve habitat.] The scoping does not accurately describe the current method used by the USFS and the North Carolina Wildlife Resource Commission (NCWRC) to create wildlife fields. It is current practice to clearcut wildlife fields, remove all stumps, and then grade the surface prior to planting in grass/forb. This action is carried out regardless of season and recently at Bald Knob Branch (FR5038) such a field was created during migratory bird nest and brood season. Clearcutting and grading a forested stand during nesting and brooding season certainly kills ground and shrub nesting birds, such as Ovenbirds, various warblers such as hooded warbler, towhees, catbirds, thrashers, woodcocks, field sparrow, etc [hellip] While wildlife fields, when properly created and maintained, do provide important habitat the USFS and NCWRC have a legal obligation to provide environmental impact and in accordance with the Migratory Bird Treaty they cannot knowingly or unknowingly harm migratory birds without considering the impact. Until and unless the USFS and NCWRC agree to provide Environmental Impact assessments for migratory birds and commits to avoiding creating fields during nest and brood seasons then I strongly oppose all new wildlife fields. Here it is important to note that the NCWRC already avoids nest and brood season for maintenance activities, it is surprising that they and the USFS do not already limit clearcutting and grading for creating fields as well.

Pisgah National Forest Lickstone Project Scoping Comments 06-27-2022 WILDLIFE HABITAT On page 8 under bullet 4)-b) [While not in a Golden Winged Warbler focal area, there are records of Golden Winged Warblers 3 miles away on Rich Mountain. The project

area is within the broader Appalachian Mountains Joint Venture Priority Area for Golden Winged Warblers. Improved habitat in the Project Area would be beneficial for this species. [ldquo]The USFS uses a single species, Golden-Winged Warbler, to justify proposed timber treatments as habitat improvement for a threatened species. The Lickstone Project is within the Appalachian Mountains Joint Venture Priority Area. The Golden-winged Warbler Working Group (GWWWG) (<http://www.gwwa.org>) publishes a Best Management Practices for Golden-winged Warbler Habitats in the Appalachian Region. The GWWWG recommends habitat efforts should be <5 miles (preferably <1 mile) from known golden-winged warbler populations and <1 mile from other early successional habitat patches. eBird, the most comprehensive and widely used bird database online, shows only 2 sightings at Black Balsam within the last 4 years, the last of a single bird in 2020. Black Balsam is 4.8 miles away and 2 sightings in 4 years does not suggest there is a nearby population. It would be much better for the USFS and the NCWRC to concentrate habitat efforts in areas of northwestern NC, from Max Patch to Sandy Mush where there are populations of golden-winged warblers and work to [lsquo]grow[rsquo] the new habitats outward from these known population areas. While I support the goal of improving habitat for Golden-winged warblers I do not support using them to justify any and every treatment or action that creates ESH as being for the benefit of them. Does the USFS have any data or evidence that creation of ESH in the Pisgah district has helped Golden-winged warblers? MAPS and GIS I was provided GIS data by the USFS. The GIS data has additional information that would be beneficial to a reader of the scoping document. The GIS data also has some different terminology than used in the scoping which makes it challenging to understand without clarification from USFS. I was able to get clarification and appreciate that, but it made reading the document and providing meaningful comments more difficult and time consuming. I hope that the USFS will improve the document and GIS data to make them a complete and complementary reference set. I strongly recommend that the USFS integrate GIS data into the published project archives and not provide them only on request. Many people do not know they can be requested. PROJECT RESEARCH The Lickstone Project area is in an extremely remote area and access is challenging at all times but especially outside the few months that FR97 is open. I encourage the USFS to provide more opportunities and time for public comment on this project due to the challenges of site research. I also encourage the USFS to improve their published materials by adding photographs and more detailed maps. Site research is also a challenge because the open season for FR97 is during hunting season. The USFS should consider opening FR97 for some period of time outside of hunting season to enable the public to research the area without risk of conflict with hunters. I have been into the area many times during hunting season and never had any conflict but if more people access the area to learn about the project then the chance of conflict increases. CONCLUSION It is unfortunate that the first project under the new forest plan requires so much road building and will occur in such a remote location with the highest quality watersheds in the forest. That seems counter to Pisgah National Forest Lickstone Project Scoping Comments 06-27-2022 to everything the USFS has communicated throughout the planning process. Under the guise of restoration and regeneration this project is a lot of commercial harvesting and preparation for even more harvesting in the future. Places like Lickstone are rare in the 1,000,000 acres of forest lands. Rare in the sense they are extremely remote. Rare in the sense that they are the headwaters of one of the major rivers in our region. Rare in the sense that they are pristine habitat for many plants and animals. I look forward to working with the USFS to revise and improve this project. Nicholas Holshouser 354 Maple St. Brevard, NC 28712 Summary of Comments

on Lickstone Project Comments Scoping Page: 13 Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:55:20 PM According to the NPFP it is not appropriate to use NRV at the project level. Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:57:02 PM Is the departure analysis using all the acres of the North Slope area or just Lickstone? Over 2/3 of the GA is wilderness and therefore you could never achieve a landscape level NRV with only 7,100 acres of area to manage in Lickstone. Page: 14 Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:58:47 PM Is NRV considered and analyzed for the whole GA or just Lickstone? Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:59:50 PM There are wildlife fields proposed that are >15 miles behind the gate - how many hunters or other people will use these fields realistically? Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:25:12 PM Scoping should address every water crossing and provide details of current condition and desired condition. Page: 16 Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:35:41 PM North Slope GA encompasses significant areas of established wilderness. The NRV for the whole North Slope GA will always be skewed because of this. Lickstone represents a small portion of North Slope GA. It

is not possible to achieve NRV for all of North Slope using only non-Wilderness areas like Lickstone to achieve this. Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:28:12 PM Because only Matrix and Interface are suitable MAs to create young forest there will in fact be too much young forest created in these MAs as a proportion of their acreage. It is not reasonable to take an average across a large geographic area and then by managing a smaller subset of that area try to achieve some average using the whole area as a base. Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:29:30 PM There is no management opportunity in Wilderness MAs - the forest will age there naturally. To use that acreage as the only base for Old Growth will preclude Old Growth in other MAs. It is not logical. Page: 17 Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:32:18 PM Cutting older Oak to create younger oak will cause a reduction in soft mast for many years until the younger oaks 'catch up' in terms of mast generation. Cutting too much older oak may be detrimental to wildlife in the near to mid-term. There is no discussion or analysis of total mast production over time. Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:35:48 PM Wildlife fields are created (currently) by clear-cutting and grading, they have the potential to cause direct harm (injury and death) to many animals, especially migratory birds that ground nest. All wildlife field creations should be subject to specific harm analysis as part of EIS and NEPA. Activities should be prohibited in nest and brood seasons for migratory birds. Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:05:26 PM While some species may have priority there should be consideration of other species and harm that may be caused to them. This is, to my knowledge, never a consideration. Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:34:59 PM Citation of research or published papers? What specific treatments are considered habitat improvements and expected to support Golden Winged Warblers? Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:38:55 PM What is 'improved bear habitat'? What treatments improve bear habitat? Page: 18 Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:35:51 PM What is improved habitat' for Cerulean Warblers? Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:40:59 PM Habitat improvement is a catch-all benefit for multiple species but there's no detail about what treatments specifically benefit what species and no insight on whether any treatments might negatively effect other species. Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:07:01 PM Numerous culverts have failed and many on FR97 have significant (>4ft) drops from the road to the stream below. All these prevent aquatic organism passage and should be corrected regardless of MA. Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:35:55 PM There is no detail on how much clearing and widening is needed to accomplish this. How many acres? Is this enough to be a 'commercial' harvest? How will road grade be prepared in remote areas where the road has 'regressed' already to a more natural state (i.e.. not gravel surface)? Increasing sunlight is a double-edged sword - on one hand it improves drying, on the other hand it exposes the road to direct rainfall where a canopy would deflect rain and leaves would capture much of the force. Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:35:55 PM Define 'decommission' - does it mean to obliterate or only to remove from inventory (i.e.. leave on ground). Will decommissioned roads ever be used again? Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:19:26 PM How will these roads be maintained given current backlog? When will these roads be used again and for what purpose? Page: 19 Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:35:58 PM There should be additional columns showing whether the treatments are commercial or non-commercial and how much road building is required for each. Further, it should be shown how each treatment meets quantifiable Tier 1 objectives for acreage and how the treatments will subsequently be monitored - i.e.. what metrics are measured and what is success. Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:35:58 PM Treatment and Proposed Actions use slightly different terminology, e.g.. Two-Aged Regeneration Harvest and Uneven-aged Harvest. The Treatment Uneven-aged Harvest is actually several Proposed Actions, whereas Two-Aged Regeneration proposed action is listed as several treatments. It is confusing. It is not apparent how many acres are proposed for each action. This gets further complicated when the maps list Proposed Actions but not Treatments. Page: 20 Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:51:39 PM Provide timelines for these long-term multiple entry treatments. When would the future commercial harvest take place. Is access needed (roads) for any pre-harvest actions and how much road would be needed in the future? Page: 21 Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:36:01 PM A timeline of actions should be provided for each treatment. If subsequent entries and actions are needed/required then these actions should be listed and planned. There should be a master plan showing not only current but future/expected actions and treatments in order to assess feasibility of plans in the

mid-to-longterm.Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:49:19 PMAuthor: Nick Holshouser Subject: Sticky Note Date: 6/27/2022 3:50:08 PMhow much is harvested the first time and subsequent entries?Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 10:01:49 PMSee prior comment - provide a timeline for subsequent required/planned actions.Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 10:05:31 PMProvide a timeline of future required treatments/actions, the necessary road maintenance, and related detailsfor the life of the stand until it is commercially harvested. The table lists 7 units and 667 acres but there is nodetail regarding required road building for this proposed action.Page: 22Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:36:09 PMwhat commitment does the USFS make to continuing these needed treatments long term? What h happens ifthey are not done in a timely manner?Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:28:16 PMThe needed roads will have to be maintained forever - and it will be 10-15 years until a needed noncommercialtreatment. In all these roads are being built for a subsequent commercial harvest how many yearsin the future?Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:19:36 PMTrees not expected to survive 20 years would likely include damaged or snag trees which are critical forwildlife habitat, both animals and birdsAuthor: Nick Holshouser Subject: Highlight Date: 6/24/2022 10:10:54 PMwhen are these clusters? no timeline providedPage: 24Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:10:46 PMCurrent NCWRC practice is to clearcut the forest to create openings and use heavy equipment to removestumps then grade. This is not at all what is described here. Please provide an accurate description.Page: 25Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:19:52 PMThe Pisgah Roads Analysis Project RAP Report (December 2003) is available online by searching but that is not sufficient. It's use as a reference in this document should require its posting in the project archive or at least a link in the scoping for public review. Further, relying on a nearly 20 year old report for roads analysis is not appropriate for project scoping.Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:20:03 PMThere is no detail regarding the use of the roads (summary) as needed for timber harvest or other uses suchas wildlife field access or non-commercial timber treatments. Further, there is no detail regarding Tier 1 targets for actions in the scoping. Thus, it is not possible to determine if the proposed actions are reasonableand aligned with Tier 1 objectives.Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:11:22 PMestimate of how many acres this will open?Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:15:51 PMThis is a very general statement which lacks enough detail for analysis and specific comment. Temporaryroads have a significant impact on the landscape during and after harvest, temporary roads should beestimated and costs/benefit analysis shown. I find it difficult to believe that the project requires >6 miles ofnew roads and only 0.2 miles of temporary roads. In the Courthouse project the USFS determined that severalmiles of roads were skid roads and not temporary roads and simply left them on the landscape - you can seethem from space on google maps...Page: 36Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:22:00 PMCorrect terminology to align with GIS - this stand is marked 'Regeneration Harvest' in GIS, this is confusing.Terminology should be consistent.Page: 37Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:22:11 PMStream mapping does not accurately reflect lower order perennial or ephemeral streams, the mappingtherefor does not adequately describe the stream crossings.Page: 40Author: Nick Holshouser Subject: Highlight Date: 6/24/2022 9:22:20 PMTable should have a summary of miles for LWO, daylighting, add existing corridor, new road. Decommissionneeds more detailed explanation. Are roads being simply taken off the system? Are these mapping errors? Dothese roads exist in some form on the ground? Have these roads (if existing) been checked for issues/problems which need correction?Page: 41Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:36:09 PMThe term 'existing corridor' is vague and never defined. There are woods roads which date to the early 1900sand were never part of any USFS action or project. There are other old roads which were supposed to betemporary when originally built. The term existing corridor should be defined. The definition should includehow wide at a minimum, year of origin, prior use (if known). No road which was formerly classified astemporary should be considered existing corridor and turned into a system road. This is not what temporarymeans. No road which was not put in place by the USFS should be considered existing unless it was originallyput into the system as a system road and has a name and assigned classification/designation. Whenconsidering an existing corridor the USFS must provide details of how much improvement is needed - i.e..how much wider, how many crossings, required maintenance levels, risk of sedimentation/erosionAuthor: Nick Holshouser Subject: Highlight Date: 6/27/2022 4:36:12 PMOpposed to making FR97 an LWO. This significantly cuts access to the area except for hunting season andprejudices the

biking users. As remote as the area already is I doubt bikes cause any wildlife disruption offseason. I also do not know of any roads which are LWO when gated but not LWO when gate is open (i.e.. in hunting season) Author: Nick Holshouser Subject: Highlight Date: 6/27/2022 3:22:53 PM climbs steep ridge (side-slope) of hardwoods, how much clearing is needed?