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Comments: Dear Dave, We have enjoyed working with your staff during the pre-scoping phase of the Lickstone Project. The level of engagement with the public has been excellent so far. We also think that the Scoping is of much higher quality than projects that do not involve the public early in the process because of the inclusion of ideas generated pre-scoping. We are submitting these comments on behalf of MountainTrue and our 12,000 members and supporters with the hope that the project will continue to be refined. Silviculture is refreshing to see a project with so many different silvicultural prescriptions. In our decades of closely following National Forest timber sales, we have mostly seen the same prescription, the [ldquo]two-age leave[rdquo] (which might be better classified as a clearcut with reserves), proposed for the majority of timber harvests with very mixed results. In many ecozones, the scale of disturbance resulting from clearcuts with reserves are naturally rare, and these large gaps tend to promote dominance by just a few tree species because of a lack of fire and the fact that light and moisture environments are not diverse after harvest. We are encouraged that the Lickstone Project proposes at least four types of commercial harvest, as well as non-commercial harvest and prescribed fire. We believe that the project will produce better results because of the diversity of silvicultural prescriptions, especially when those silvicultural prescriptions are specified for the Ecozones and conditions on the ground.

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Inventoried Roadless Area

We are most concerned about the proposal to put openings up to three acres in the Middle Prong Addition Inventoried Roadless Area. This action is not consistent with the Roadless Rule. There are several separate requirements that must be met to cut trees in an IRA.

- [bull] First, tree cutting must be limited to generally small diameter trees. The whole purpose of the [ldquo]small diameter[rdquo] exception was to allow the Forest Service to deal with ladder fuels in fire-prone areas. See 66 Fed. Reg. at 3257. Since creating up to three acres of openings would not be geared towards thinning small diameter material and would cut groups of trees rather than individual trees we believe this proposal fails to meet this criterion.
- [bull] Second, the action proposed in IRAs must be [ldquo]infrequent[rdquo]. Creating early seral habitat (ESH) is the catch-all reason for management in our forests, so if this particular intent of creating wildlife fields and ESH were considered adequate justification for cutting in roadless areas, there would be no basis to conclude that such actions will be [ldquo]infrequent[rdquo].
- [bull] Third, the tree cutting must be [ldquo]needed[rdquo] (not just intended) [ldquo](i) To improve threatened, endangered, proposed, or sensitive species habitat; or (ii) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.[rdquo] The proposed fields near Double Spring Gap would serve no known TES species, and could conceivably negatively impact current or future habitat of T&E species like Carolina Norther Flying Squirrel and Spruce-Fire Moss Spider. As discussed further below, moreover, the cutting would not maintain or restore ecosystem composition and structure.
- [bull] Fourth, tree cutting must actually, in fact [ldquo]maintain or improve[rdquo] one of the following roadless area characteristics:
 - o High quality or undisturbed soil, water, and air;
 - o Sources of public drinking water;
 - o Diversity of plant and animal communities;
 - o Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
 - o Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
 - o Reference landscapes;
 - o Natural appearing landscapes with high scenic quality;

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o Traditional cultural properties and sacred sites; or

- o Other locally identified unique characteristics.

It must be noted that these are the characteristics already present in and provided for by roadless areas. 36 C.F.R. 294.11. Protection of roadless areas, and the default prohibition on tree cutting, is a strategy chosen deliberately by the agency to protect habitat diversity, rare

species, and species dependent on large, undisturbed areas of land. In other words, the roadless rule's prohibitions are the way to protect habitat diversity; they are not obstacles to creating habitat diversity. In the roadless rule, the Forest Service made the decision that protecting habitat diversity in the long term requires limiting management in delineated large, undisturbed areas. It is our opinion that cutting individual small diameter trees (and perhaps even some canopy trees) to increase the growth of residual spruce and fir in Southern Blue Ridge Spruce-Fir Forest is a globally imperiled plant community with several associated TES species could potentially meet the requirements of the roadless rule. Cutting large openings in this community for wildlife fields for the general goal of creating ESH, however, does not. The Departure Analysis is at the Wrong Scale, with Arbitrary Boundaries. The Departure Analysis included in the Scoping has several problems. The first of which is that it is completed at the scale of the North Slope Geographic Area. This geographic area contains only 37,000 acres of land, and is the wrong scale to evaluate departure from NRV. Departure from NRV should be calculated at the bioregional scale, or, at a minimum, the scale of the entire Nantahala-Pisgah. In fact, such departure analyses have been completed. The danger of doing these analyses at a small scale is that the conditions locally may be quite different from the conditions regionally. Conditions that are considered overabundant locally, may, in fact, be under represented regionally. What is even more concerning in this case is that the North Slope Geographic Area was defined for administrative and recreational reasons more than ecological ones. The North Slope Geographic area has less National Forest Land than the Upper Pigeon Watershed, which has 41,000 acres, including a large amount of early seral habitat in the Flat Laurel Creek/Black Balsam/Graveyard Fields Area. Excluding the parts of the Pigeon River Watershed with the largest concentration of Spruce-Fir Ecozone and early seral habitat is convenient for supporting the decision that the Forest Service needs to create more early seral habitat, including in the endangered Spruce-Fir Ecozone, but this conclusion is not rooted in reality. The Departure Analysis is Based on Faulty and Misleading Data. While we are unclear on the exact methods used, the departure analysis in the Scoping Document appears to have been completed by intersecting the Ecozone model with FS VEG database. Unfortunately, FS VEG is very inaccurate in defining stand age in the analysis area. In particular, a number of stands which are classified as late seral and originating in 1925 are actually early seral. These 29 North Market Street, Suite 610 Asheville, NC 28801 828.258.8737 611 N. Church Street Hendersonville, NC 28792 828.692.0385 164 South Depot Street Boone, NC 28607 828.719.7624 16 Stewart Street Franklin, NC 28734 828.349.3899 mountaintrue.org WATERKEEPER ALLIANCE MEMBER stands burned 1925 and again in 1942, and as millions of people who have visited the area can attest, there are thousands of acres covered in shrubs, grasses, and forbs in this part of the Balsam Mountains. But Forest Service data indicate that these stands originated in 1925 and are thus late seral. To further demonstrate this problem, we analyzed the actual amount of early seral habitat on National Forest Ownership in both the Upper Pigeon Watershed and the North Slope Geographic Area. This analysis was performed with LiDAR data where vegetation less than 15' in height and greater than 1/2 acre in patch size was considered a conservative estimate of early seral habitat. To smooth the data and eliminate small patches of early seral habitat as well as individual trees in a matrix of shrubs and herbs, seven majority filters were performed and patches of short vegetation smaller than 1/2 acre were excluded. This analysis shows that the Upper Pigeon Watershed has a total of approximately 2,900 acres of existing early seral habitat, with a single patch of approximately 2,222 acres spanning Flat Laurel Creek, Black Balsam, Graveyard Fields, and beyond. This totals 7% of the 41,099 acre HUC 10 Upper Pigeon Watershed. The North Slope GA has approximately 1,145 acres of early seral habitat that totals 3% of the 37,914 acres of Forest Service land in the North Slope GA. These data are submitted with these comments. This brief analysis demonstrates how different the answers to the questions being asked are with just a small change in the analysis area, and how favorable the North Slope GA is compared to the Upper Pigeon Watershed when making the case that there is a need for early seral habitat. The other fact illuminated here is that the data used for the departure analysis are, in fact, highly flawed and misleading given that huge deficits of early seral habitat are reported for every Ecozone in the scoping document. These analysis problems are especially acute in the Spruce-Fir Ecozone, where a 442 acre deficit of the early-s-class is reported. According to the Key Ecozone Characteristics for the Spruce-Fir Ecozone (Forest Plan p. 54) the majority of opening in the Ecozone, like other mesic ecozones are 1/8-1/4 acre, so the early s-class for the Ecozone should include small openings. Even if a half-acre threshold, such as is proposed for early seral wildlife habitat, is imposed, the

departure analysis is very inaccurate. The North Slope GA includes 3390 acres of predicted Spruce-Fir Ecozone. The mean Early S-Class percentage for the ecozone is 15.5%, or 525 acres, so the Forest Service Departure Analysis for the Geographic Area only captured approximately 83.5 acres of early seral habitat. However, intersecting LiDAR-captured young forest habitat with the Spruce-Fir Ecozone yields 435.5 acres of early seral habitat. The more ecologically appropriate analysis area of the Upper Pigeon River HUC 10 watershed has 1236.8 acres of early seral habitat in 5,233 acres of Spruce-Fir Ecozone, meaning that 23.6% of the Spruce-Fir Ecozone is composed shrub, scrub, grass, and forb habitat in patches greater than $\frac{1}{12}$ acre. That represents an over abundance of early seral habitat for the Spruce Fir Ecozone in this watershed. In summary, the combination of improper analysis area and poor-quality data have contributed to a severely flawed and inaccurate departure analysis for the Lickstone Project. Some critical thinking and ground-truthing of the analysis could help to fix these problems, as the numbers presented are only believable if one has limited knowledge of the conditions on the ground in the area. In our opinion the

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view that there is a lack of early seral habitat everywhere in the Blue Ridge, which is dogma among foresters and wildlife biologists in the Forest Service, also creates confirmation bias that leads the agency to pursue unneeded and potentially damaging actions in one of the most imperiled Ecozones in the region. We believe plans to add unneeded, artificial openings in the Spruce-Fir Ecozone should be abandoned in favor of efforts to do what is actually needed, and promote the development of more late-seral and old-growth Spruce-Fir Forest.

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Roads The Scoping document claims the project will add 6.27 miles of road while decommissioning 6.82 miles of road. On the surface, this looks like a net decrease of roads in the project area, but we believe this is misleading. Some of the roads proposed for [decommissioning], such as 970X [Upper Boomer Inn], do not exist on the ground are in reality being realigned. Other roads that are being decommissioned, such as Bear Trail Ridge, are already impassible and in some stretches barely recognizable as a road. A [road] that isn't really there isn't a [road] at all under Forest Service policy. 36 CFR 212.1 defines a road as [a motor vehicle route over 50 inches wide, unless identified and managed as at trail.] A system road is a [road] wholly or partly within or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the [NFS] and the use and development of its resources. System roads must be included in the forest transportation atlas. Road [decommissioning] is defined as [activities that result in the stabilization and restoration of unneeded roads to a more natural state.] Any actual road (system, temporary, or unauthorized) can be decommissioned, but something that is not an actual, physical road cannot be decommissioned as a matter of law. We think it is fine to tabulate the miles of road being removed from the system for accounting purposes, but non-system roads and roads that exist on paper only should not be seen as an offset for the addition of roads in fact to the official road system. We also have major concerns that Forest Plan estimates for road construction will be exceeded. The Lickstone Project seems well on its way to maxing out the estimated annual road construction mileage for Pisgah and Nantahala National Forests without coming near to the top end of Tier 1 timber harvest acres. The historical trends of huge maintenance backlogs for roads and sedimentation of mountain streams by those roads looks set to continue and increase. This connects to our concerns that the Forest Plan did not accurately or comprehensively analyze the issues with the road system, the likely increase in the road system under elevated levels of timber harvest, and the subsequent damage to water quality and wildlife habitat the increase in substandard roads will create.

Impact to Backcountry Areas While the proposed Forest Plan declined to designate any Backcountry outside of the IRA on Lickstone Ridge, its inclusion in the Potential Wilderness Inventory identifies it, by default, as one of the most remote locations in the region. We realize that the Forest Service proposes Matrix for all of the areas we are raising as concerns, here, but the title bestowed by the Forest Service does not change the reality of

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828.719.762416 Stewart Street Franklin, NC 28734 828.349.3899mountaintrue.orgWATERKEEPER ALLIANCE MEMBERthe character of the area, nor will it cause people that value natural landscapes over human dominated ones to care less about the remote portions of Lickstone Ridge.It is especially concerning to us that roads are proposed for construction and addition to the road system in the remote contexts that were supported by the Nantahala-Pisgah Forest Partnership for Backcountry Management. 97U and 97W are both proposed additions to the road system that we oppose. Likewise, we do not believe the benefits of building these roads and logging the stands they access outweigh the impacts to the remote character of the area. Units 5, 9, 23, 52, and 57 all completely or partially overlap areas the had strong support from the largest possible consensus group as backcountry management. These areas are not only remote, but they are very steep, and present hazards to soil and water to harvest. The outcome of the Panther Branch and Bald Knob timber sales from nearby Courthouse Creek, both of which caused excessive sedimentation in the form of BMP failures and a landslide, should provide a cautionary example and weigh against pursuing road construction and harvest in these areas.Non-Native Invasive SpeciesOne of our chief concerns with road construction and timber harvest in the Lickstone Area is that those activities produce ground disturbance that will inevitably benefit damaging invasive species like garlic mustard, Oriental bittersweet, tree of heaven, and multiflora rose. All of these species are present on site and will require serious and sustained attention to prevent them from becoming more prevalent. We encourage Pisgah National Forest to pursue control of these species before and after harvest operations to limit their spread.Final ThoughtsWe can tell that the Forest Service has been listening to a variety of public and agency input and we appreciate the responsiveness of this initial proposal to the input received to this point. We believe the wildlife fields proposed for the IRA and the Spruce-Fir Ecozone are unwarranted and would be damaging, as would the proposals to log in areas with a high degree of support for Backcountry Management. We are also hopeful that the final project will modify those proposals such that we can support the Lickstone Project in the end. As always, we appreciate the work Pisgah National Forest does to steward the land and serve the people.29