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Pisgah and Nantahala National Forest's management plans comments

We are submitting these comments to be considered in the revisions to the Pisgah and Nantahala National Forest's management plans as concerned citizens who spend a considerable amount of time in the forests enjoying our state's natural treasures and the wonderful recreational opportunities the NC National Forests provide.

* In general we feel that the proposed plan focuses way too heavily on commercial timber production with little emphasis on the Forest Service mandate and responsibility to ensure ecological integrity, protect biological diversity, and provide high quality recreation opportunities in the national forests.

* Also, it should be noted that currently forest recreation creates and provides many more jobs and higher paying opportunities than the forest product industry. With the substantial growth in tourism in WNC, work opportunities in forest recreation will increase in the short to long term future. Forest management in our National Forests should therefore place a much greater emphasis on managing for forest recreation as well as protecting the forest resources for today and into the future.

Following are some specific comments that we are submitting based on the research and evaluation of The Wilderness Society and other citizen organizations that value the preservation and integrity of the Nantahala and Pisgah NF:

While the framework and desired conditions are not yet final, the proposed plans dedicate ~700,000 acres ? 70% of the entire forest, and almost 90% of the forest where logging could occur under federal law ? to ?the purposeful growing [and] harvesting [of] crops of trees to be cut into logs.? This ignores their responsibility to ensure ecological integrity, protect biological diversity, and provide high quality recreation opportunities.

Designating these lands as ?suitable? for timber production means that (a) the Forest Service intends to log them as crops and (b) the Forest Service will be required to include rules in the Plan mandating they be logged at certain levels, whether they need it or not. These are areas will then need to be ?scheduled? for logging during the life of the Plan. Not a good idea.

This proposal is a missed opportunity! The Forest Service can meet all of its goals by focusing timber harvest in degraded areas in need of ecological restoration with existing road access and increasing, rather than diminishing, protections for remote areas, rare habitats, and backcountry recreation. Instead, this proposal will generate controversial projects and make it unlikely that the agency will actually be able to implement the plan successfully.

The proposal would also require an increase in road construction in remote, unroaded, and backcountry areas. The number of acres protected from road construction would decrease, with inadequate protection for special areas/rare communities.

* Black Mountains Area ? This area should be recommended for wilderness. It is one of the premier wildland areas in the East. It is adjacent to Mount Mitchell State Park and includes the peaks and slopes of the Black Mountain Crest. Although portions of the area were logged during the same period when Mount Mitchell was logged, it has significant remaining old growth, including old growth recognized by the Forest Service within the Middle Creek Research Natural Area. Extensive spruce-fir forest along the high elevations of the area represent one of the most extensive reserves of this ecological type in the Southern Appalachians. A number of rare species and rare habitats are found in the area. The Black Mountain Crest Trail is the highest in the Appalachian Mountains and is considered one of the most rugged and difficult hikes in the East. Several side trails from the South Toe River Valley and the Mount Mitchell area make numerous circuit hikes possible. The area offers exceptional opportunities for solitude. Numerous outstanding landscape features (high mountain peaks, views, unique ecosystems and geological features, beautiful waterfalls) makes this area an exceptional resource. This inventoried roadless area and potential wilderness area is virtually road free. The area includes the entire high ridge and slopes above the South Toe Valley from Mount Mitchell to Burnsville. It is geographically well defined and configured for management as a wilderness area.

* Daniel Ridge ? The core area should be put in backcountry management, and the entire Daniel Ridge area should be part of a recommended Pisgah National Recreation Area. This area lies along the Blue Ridge Parkway just across the Parkway from Shining Rock Wilderness. Devil's Courthouse, a prominent rock outcrop, very significant in native American stories, looms over the area. Numerous trails provide opportunity for hiking and mountain biking in the area. Old growth and the rare Pinkshell azalea (*Rhododendron vaseyi*) are found in the area. The area has not been inventoried as roadless, although conservation groups have maintained that it fully qualifies as roadless. The area was included as a potential wilderness area in the inventory conducted for the Forest Plan, but almost all of the area is currently proposed for timber production (MA 1). The entire area should be managed as unsuitable for timber production. The outer part of the area has seen some logging in the past few decades. Some of these areas that have well maintained road access would be excellent candidates for ecological restoration.

Below is a list that shows the special and much-beloved Mountain Treasure Areas that are included in the USFS inventory of Potential Wilderness Additions. The management or designation that we recommend is next to each area. Many of these areas are important to residents of Western North Carolina and adjacent areas, and many are currently listed in management areas that would allow timber production.

Mountain Treasure Areas Recommended for Wilderness Designation

- * Black Mountains ? Recommended Wilderness
- * Craggy Mountains (Big Ivy) ? Recommend Wilderness Designation for existing Wilderness Study Area and potential wilderness area; for remainder Backcountry Management Area/ecological restoration Management Area
- * Ellicott Rock Extension ? Recommended Wilderness
- * Joyce Kilmer ? Slickrock Extensions ? Recommended Wilderness
- * Linville Gorge Chimneys Extension ? Recommended Wilderness
- * Mackey Mountain ? Recommended Wilderness
- * Middle Prong Extension ? Recommended Wilderness for existing Inventoried Roadless Area (IRA), Pisgah National Recreation Area for entire Mountain Treasure Area
- * Shining Rock Extension ? Recommended Wilderness for existing Inventoried Roadless Area (excluding the IRA at Flat Laurel Creek and Graveyard Fields and spruce restoration area), Pisgah National Recreation Area for entire Mountain Treasure Area
- * Snowbird ? Recommended Wilderness
- * Southern Nantahala Extensions: Sharptop, Chunky Gal, Yellow Mountain, Cherry Cove, Scream Ridge and Barkers Creek Additions ? Recommended Wilderness
- * Tusquitee Bald ? Recommended Wilderness
- * Unicoi Mountains, including Cantrell Top IRA ? Recommended Wilderness, Special Biological Area

Mountain Treasure Areas Recommended for Other Management/Designations

- * Bald Mountain - Backcountry Management Area/Special Biological Area
- * Boteler Peak - Backcountry Management Area/Special Biological Area
- * Cedar Rock Mountain - Backcountry Management Area/Special Biological Area
- * Cheoah Bald - Backcountry Management Area/Special Biological Area
- * Daniel Ridge - Backcountry Management Area/Special Biological Area
- * Dobson Knob - Backcountry Management Area/Special Biological Area
- * Harper Creek - Grandfather National Recreation Area/Backcountry Management Area/Special Biological Area
- * Jarrett Creek - Backcountry Management Area/Special Biological Area
- * Laurel Mountain - Pisgah National Recreation Area/Backcountry Management Area/Special Biological Area
- * Lost Cove - Grandfather National Recreation Area/Backcountry Management Area/Special Biological Area
- * Slide Hollow IRA ? Backcountry Management Area
- * South Mills River - Pisgah National Recreation Area/Special Biological Area
- * Sugar Knob - Grandfather National Recreation Area/Backcountry Management Area/Special Biological Area
- * Tellico Bald - Backcountry Management Area/Special Biological Area
- * Upper Wilson Creek - Grandfather National Recreation Area/Backcountry Management Area/Special Biological Area
- * Wesser Bald - Backcountry Management Area/Special Biological Area
- * Woods Mountain - Backcountry Management Area/Special Biological Area

Many of these Mountain Treasure areas contain ?Significant Natural Heritage Areas? recognized by the state of North Carolina. A new Management Designation for ?Special Biological Areas? should be created for these forest tracks.

A number of other North Carolina Mountain Treasure Areas are not included in the USFS inventory of Potential Wilderness Additions at all. These areas should be managed to maintain their special, important characteristics. These biologically diverse and scenic areas also deserve special management considerations in the new forest management plan, and should not be part of management areas that allow timber production. Below are recommendations for how these areas should be managed.

- * Overflow Creek (Blue Valley) ? Recommended Wilderness for the Inventoried Roadless Area
- * Alarka Laurel ? Backcountry Management Area
- * Ash Cove ? Backcountry Management Area/Special Biological Area
- * Bluff Mountain ? Backcountry Management Area
- * Fishhawk Mountain ? Backcountry Management Area/Special Biological Area
- * Santeetlah Bluffs ? Backcountry Management Area/Special Biological Area
- * Siler Bald ? Backcountry Management Area
- * Terrapin Mountain ? Backcountry Management Area/Special Biological Area

In conclusion; We believe that the proposed plan has a very narrow focus, targeting timber resources, without adequate consideration of the biological and ecological values or the many other multiple use opportunities and potential that our NC forest provide. The Forest Service has the responsibility to take these other factors into consideration in developing a plan for the management of OUR National Forests. This plan as presented does not do that. It is imperative that the proposed plan be re-evaluated with extensive revisions to reflect the true value of these resources and develop management activities to preserve and enhance those values, while providing a suite of compatible economic and recreational use opportunities.

Thank you for considering our comments.

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