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Re: Plan Revision Comments

Excellent letter Bill. Thanks for sharing it.

On Fri, Sep 1, 2017 at 2:26 PM, bill thomas <billthomas@comporium.net <mailto:billthomas@comporium.net>> wrote:

Pisgah Group, NC Sierra Club
c/o PO Box 272, Cedar Mtn, NC, 28718
Sept. 1, 2017

Planning Team
USDA Forest Service
NC Forests

The Pisgah Group covers the Transylvania, Henderson and Polk County area, with some 600 members. Many of us are heavy users of our national forests, and are particularly familiar with the Pisgah District. We wish to offer our comments on the Plan Revision, as we understand it today. Some of us participated in the inputs to the development of the current Management Plan.

The current working draft of the P/N Forest Plan zones the Forest into "interface", "matrix" and "backcountry"(IMB) areas. It is not at all clear whether these constitute "management areas", each with their own Standards and Guidelines as in the current Forest Plan. Instead there is mention of "management areas within the geographic area" such as the Cradle of Forestry, Bent Creek, John Rock scenic area, etc. Are these "Management Areas (MA's)", or are the interface, matrix and backcountry zones mentioned the actual management areas? In the current plan MA's zone the forest in far more detail, based on timber stand characteristics, riparian area, and the designated areas like the Appalachian Trail, Wilderness Study Areas, Wild and Scenic River Corridors, etc.

In other words it is not clear where this Plan is headed. It looks like the direction is to avoid much specificity on what might be done in the three big zones, leaving actual management up to Forest Service decisions when individual local projects are be proposed. Instead of putting bounds on management at the Plan level it makes each project the focus of debates and decisions on the fundamental purpose of our national forests and for what purposes they should be managed.

There is another way to zone the forest that needs to be done before any Plan is proposed. This is the biological functioning of the forest as a landscape entity, one that is also connected to national forests in Tennessee and South Carolina. The most critical and restrictive habitat requirements should be mapped, perhaps that for black bears and neotropical bird migrants, just as was done in developing the current Plan. Other habitat overlays, like bogs, riparian areas, water supply zones, old growth, rich coves, etc. could be part of such a biological approach to arriving at actual management areas. The current zoning looks more

like an identification of roaded and heavy use areas with all the rest tossed into matrix and the Inventoried Roadless Areas.

For instance, in the Pisgah District, areas such as Daniel Ridge, Cedar Rock, Big Ridge not now in the Roadless Area Inventory, need to be treated as backcountry or primitive areas. There are similar examples in other Districts. The "matrix" area needs further subdividing for specific management.

What is going to happen to the "Old Growth Areas" identified and set aside in the current Plan? A bait and switch strategy would be a serious blow to the integrity of the US Forest Service. The black bear population has recovered from its low levels of the 1980's. Could it be that habitat strategy actually worked? Did the continuous canopy bird patches have any beneficial results? We seem fixated on early successional habitat to promote hunting species like deer and grouse right now. Is this a biological requirement for a natural forest approximating a pre-European forest, or it a gesture to the hunting public?

The work being done by biologist Gary Kauffman and others, in an heroic attempt to determine what the forest really wants to be, (FORPLAN on steroids?) is to be encouraged for its biological approach, (even though the goal is to find where timber can be harvested).

To be clear, and to summarize our overall approach to our National Forests, we believe that these remnants of the great forests of pre-European settlement are national treasures that should be managed to retain and perpetuate these attributes. Conventional economics will not protect them, as we have no accepted ways to value their ecosystem services to humankind. Trees, especially the deciduous trees of our forest, do not grow fast enough to create a high return on investment. Large old trees of veneer quality would disappear in a flash. There would never be any old growth. It is up to us now to put the value on our forests that will protect them and not impair their use by future generations.

We look forward to more dialog and participation in the development of this Plan.

Sincerely, Bill Thomas, Conservation Chair, Pisgah Group