



File Code: 1950

Date: 2/5/2008

Dear Interested Party:

This is to notify you that the Dylan Project Decision Notice (DN) and Finding of No Significant Impact (FONSI), and Appendix F to the EA, my Response to Comments, have been posted on the National Forests in North Carolina (NFsNC) website at <http://www.cs.unca.edu/nfsnc>. I have selected Alternative C to conduct wildlife habitat creation and improvements, timber harvesting, site preparation and reforestation, and timber stand improvements in Compartments 88, 125, 126, and 152 on the Nantahala Ranger District. The Environmental Assessment (EA), with maps, is also posted on the NFsNC website at <http://www.cs.unca.edu/nfsnc>.

This decision is subject to appeal pursuant to 36 CFR 215.11. A written appeal, including attachments, must be postmarked or received within 45 days after the date this notice is published in the *Franklin Press*. Any appeal of this decision must be fully consistent with 36 CFR 215.14, "Content of an Appeal", including the reasons for appeal, and must be filed with the Appeal Deciding Officer at this address: Forest Supervisor, National Forests in North Carolina, 160 Zillicoa Street, Asheville, NC 28801-1082. Appeals also may be faxed to (828) 259-0584 or electronically filed by sending them to appeals-southern-north-carolina@fs.fed.us. For further information on this decision, contact Mike Wilkins, Nantahala Ranger District, 90 Sloan Road, Franklin, North Carolina 28734, (828) 524-6441.

If no appeal is received, implementation of this decision may occur on, but not before, five business days from the close of the appeal filing period. If an appeal is received, implementation may occur on, but not before, fifteen business days following the date of appeal disposition.

Thank you for your interest in the management of the National Forests in North Carolina.

Sincerely,

/s/ Joan Brown, for
MICHAEL L. WILKINS
District Ranger



DECISION NOTICE
AND
FINDING OF NO SIGNIFICANT IMPACT

DYLAN PROJECT

USDA FOREST SERVICE
NANTAHALA NATIONAL FOREST
NANTAHALA RANGER DISTRICT
FRANKLIN, NORTH CAROLINA
JANUARY 2008

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INTRODUCTION:

An Environmental Assessment (EA) with associated documents is available for public review at the Nantahala Ranger District office in Franklin, NC. The EA discusses proposed timber harvest, associated site preparation and reforestation activities, and wildlife habitat and timber stand improvements for the Dylan project. The project activities are located on National Forest land in Compartments 88, 125, 126, and 152 in Macon County.

The project is needed in order to recondition existing wildlife habitat, to create new wildlife habitat in a variety of ways, to emphasize silvicultural treatments in order to provide for a high-quality, sustainable forest, and thinning on a schedule that maintains optimum growth and the desired mix of tree species for sawtimber production. The proposed action is in compliance with the direction set forth in the Land and Resource Management Plan (LRMP) 1986-2000 for the Nantahala and Pisgah National Forests, and Amendment 5 (1994), in a manner which moves project area resources toward desired future conditions.

Specific project objectives are to:

- 1) Provide for a range of early successional habitat through timber regeneration harvesting and wildlife brushy openings, while producing a minimum of 1 million board feet (MMBF) of sawtimber for the local economy;
- 2) Maintain and/or enhance biological diversity by protecting population viability of rare species which occur in the compartments, by reproducing existing forest species, especially oaks for hard mast production, and yellow pines to perpetuate mixed hardwood-pine or pine-hardwood communities;
- 3) Create new grass/forb openings and create/enhance additional wildlife habitat where practical;
- 4) Improve habitat for the golden winged warbler where possible; and
- 5) Conduct forest management activities in order to provide for improvement and/or restoration of existing forest stands within the area.

DECISION:

Based on the results of the analysis documented in the EA and project file and comments during scoping and the formal 30-day comment period, my decision is to **implement the proposed action, Alternative C.**

The **proposed action** includes tree harvesting using conventional ground-based and skyline yarding systems, pre- and postharvest vine control, site preparation, prescribed burning, natural regeneration and planting of shortleaf pine, new stand improvement after the first growing season, crop tree release (timber stand improvement) treatments, roadside thinning, invasive species control, existing wildlife opening refurbishing, creation of new wildlife habitat, watershed restoration on one section of Forest system road, and understory planting of hybrid American chestnut trees in the proposed regeneration areas as available.

Specifics are as follows:

A. Treatments for the purposes of vegetation habitat improvement, and for forest regeneration, sustainability, and provision of early successional habitat:

Regenerate a total of approximately 143 acres in 10 units by commercial timber harvest using the two-aged regeneration method. These stands are all upland or cove hardwood sawtimber stands, aged 70 years or greater. Regenerate by the two-aged method, leaving an average of approximately 15-20 square feet of residual basal area per acre. Select available den trees and vigorous growers from the codominant crown class as leave trees, favoring mast producers where available. Harvest stands 88-5 (about 24 acres), 126-7 (about 25 acres), 126-45 (about 7 acres), 126-46 (about 5 acres), 126-47 upper part (about 13 acres), 152-38 (about 14 acres), and 152-39 (about 4 acres) by conventional ground skidding logging systems. Harvest stands 125-46 (about 18 acres), 125-48 (about 10 acres), 126-47 lower part (about 12 acres), and 152-33 (about 11 acres) by skyline (cable) logging systems. Waterbar and seed skid trails, landings, and roads with an appropriate seed mixture following completion of logging activities. After harvesting, conduct site preparation for natural regeneration by chainsaw felling of residual nonmerchantable woody vegetation. Maintain the landings and roads as wildlife openings.

Regenerate stands 126-8 (approximately 9 acres) and 152-17 (approximately 19 acres) by chainsaw slashing of existing vegetation, and then prescribed burning of these areas. Follow these treatments with planting of shortleaf pine seedlings on a 10 x 12 spacing.

Thin a total of approximately 218 acres by commercial timber harvest in stands 88-15 (about 17 acres), 125-15 (about 19 acres), 125-22 (about 64 acres), 125-49 (about 18 acres), 125-50 (about 3 acres), 125-51 (about 18 acres), 126-20 (about 51 acres), 152-22 (about 22 acres), and 152-32 (about 6 acres). Thin these stands to approximately 80 square feet of residual basal area per acre. Trees of all sizes are prioritized for removal in order to leave high-quality growing stock. Use conventional ground-based skidders to log all these stands.

At least two growing seasons prior to harvesting stands 88-5, 125-48, and 126-7 (totaling about 59 acres), **cut individual grape and smoke vines** in these stands, then spray the cut surfaces with triclopyr amine herbicide mixed 50/50 in water, or treat them with triclopyr ester/mineral oil in a backpack streamline spray. The vine control work is needed in order to prevent prolific growth from existing vines immediately after units are harvested. The objective is to reduce grapevine and smokevine competition to newly-regenerating trees, not to eliminate vines from the stands. In each stand, existing grape arbors will be left, up to ½ acre per 10 acres.

Conduct grape and smoke vine control in the groups harvested in the last entry by group selection with the same methodology described in the above paragraph using triclopyr amine or triclopyr ester herbicide. Do this work in all existing groups in Compartments 125, 126, and 152 (47 groups on approximately 54 acres), and conduct manual release of ash, black cherry, and/or oak seedlings in the groups as needed.

After the first growing season, conduct timber stand improvement in all the newly-regenerated stands (about 143 acres) by controlling undesirable reproduction on stump sprouts (**stump sprout clumps only -no single stems**) of red maple, striped maple, silverbell, sourwood, dogwood, yellow poplar, and blackgum and individual grape and smoke vines as needed. Accomplish this work by backpack streamline spray application of triclopyr ester and imazapyr mixed in mineral oil.

Conduct an oak preharvest midstory treatment on approximately 300 acres in stands 88-18 (35 acres), 125-3 (36 acres), 125-6 (20 acres), 125-31 (31 acres), 125-33 (23 acres), 126-19 (27 acres), 126-24 (31 acres), 126-26 (53 acres), and 126-27 (44 acres). Treatment would consist of: 1) injecting trees with a diameter at breast height (DBH) greater than or equal to 1.5 inches and less than or equal to 10 inches DBH with a 50% solution of triclopyr 3A and water; and 2) streamline treatment of woody stems taller than 4 feet with a DBH of less than 1.5 inches with triclopyr 4E. All stems except oaks, ash, black cherry, and hickory would be treated. The purpose of this treatment is to improve species composition of the existing stands while encouraging the growth of advanced oak reproduction and regeneration of other desirable species in the stands.

Conduct a crop tree release treatment (timber stand improvement) on about 169 acres in stands 88-10 (about 25 acres), stand 125-20 (about 24 acres), stand 126-28 (about 23 acres), stand 151-8 (about 25 acres), stand 151-12 (about 13 acres), stand 151-24 (about 25 acres), stand 152-22 (about 11 acres), and stand 152-28 (about 23 acres). These stands are high-value sapling stands of cove and upland hardwoods currently ages 8-14 years. Treatment would consist of chainsaw slashing of vegetation competing with selected crop trees. In addition, competing grape and smoke vines would be slashed and treated with a 20% triclopyr ester/mineral oil solution or triclopyr amine mixed 50% in water.

As seedlings become available, conduct enrichment plantings with chestnut blight-resistant American chestnut seedlings or oaks in suitable areas of the proposed 2-aged regeneration stands. Prior to planting, conduct pre-harvest site preparation in the selected locations using an appropriate herbicide (triclopyr or glyphosate). After planting, conduct herbicide release at the planted locations as needed in each of several followup years. The planted sites would be evaluated by Nantahala district personnel and/or American Chestnut Foundation members for chestnut blight resistance and seedling competitive performance.

B. Treatments for the purpose of wildlife habitat creation and/or improvement:

Conduct wildlife opening work on 5 existing openings. Work would consist of reseeding 5 existing openings (totaling about 5 acres) with an appropriate wildlife seed mixture after disking or treating them with imazapic herbicide using a tractor sprayer. This is for the purpose of establishing grasses and forbs that are more beneficial to project area wildlife species than the existing cover.

Conduct existing wildlife opening manual slashing. Manually slash down and harvest all trees and vegetation in 100-foot-wide strips around 5 existing wildlife openings in the project area for the purpose of creating new habitat for the golden-winged warbler, a North Carolina

Watch List species. Leave one or two wooded strips approximately 30-50 feet wide as wildlife corridors into each opening. This treatment would create approximately 10 additional acres of early successional habitat in the project area.

Use herbicide (triclopyr ester) in a backpack spray application to kill young saplings in the skid roads/trails of proposed two-aged regeneration units (10 units on approximately 143 acres). Conduct this treatment after the proposed units are harvested and the new stands are about 3-5 years of age. This treatment would be for the purpose of maintaining some grass/forb habitat in these new stands for a period of 5-10 years.

Create 15 circular depressions approximately 50 feet in diameter to serve as vernal pools, which are used by bats and the spotted salamander, a project management indicator species (MIS). Some of these would be on log landings, and some in wildlife openings or on roadsides.

C. Treatments to improve existing forest roads in conjunction with the proposed treatments in sections A and B above:

Selectively thin vegetation on the roadsides of the existing FS roads (main FS roads and their subsidiary roads A-D) in these compartments for 30 feet back from the roadbanks (FS Road #s 7225, 7250, 7290, 763, 7291, 7292, and 7293). This would include removing smaller-diameter, poor-quality trees and also mature and/or damaged large trees, leaving a residual basal area of approximately 70-80 square feet per acre. The purpose of this thinning is to increase available sunlight to the roads, thus allowing them to remain drier, and to remove existing trees which are currently growing in the roads or roadbanks.

There would be no road reconstruction or reconstruction in this proposed action alternative.

D. Treatments proposed for the control of invasive exotic species:

Remove invasive species (individual plants) such as multiflora rose, kudzu, and/or honeysuckle from existing compartment roads and/or roadsides as they occur. In addition, treat the invasive exotic species in the 10 stands to be regenerated (about 143 acres) with this treatment post-harvest (this would entail treating scattered individual plants at the same time the undesirable stump sprouts are treated) (Refer to Section A above). Use triclopyr or glyphosate in a backpack sprayer (ground application) to accomplish this work

In and around the edges of all existing wildlife openings, invasive exotic species not eliminated by the tractor spraying would be handsprayed with triclopyr (amine or ester formulation), using one or more applications as needed.

Design criteria for all proposed treatments: Follow Forest-wide and Management Areas 2A, 3B, 2C, 4C, 4D, and 14 general direction and standards as described on pages III-63 through III-70, pages III-71 through III-76, pages III-77-88, and pages III-148-165 of LRMP

Amendment 5. In particular, **the following measures will be employed as part of this proposed action:**

Visual Resource Management: Proposed actions would meet the Partial Retention Visual Quality Objective (VQO) (LRMP Amendment 5 pages III-79-83) in the MA 4 parts of the project area. For the MA 3B portion, activities would meet the Modification VQO (LRMP Amend. 5, page III-72) in the general area and the Partial Retention VQO on sites visible from the Appalachian Trail.

Wildlife Management: The proposal would follow standards in LRMP Amendment 10 (USDA Forest Service, 2000) to minimize the risk of incidental take and conserve habitat for the Indiana Bat. It would comply with the terms and conditions listed in the U.S. Fish and Wildlife Service's Biological Opinion (B.O., April 2000). Retain as many snags and den trees as practicable. Designate and retain living residual trees in the vicinity of one third of all large (>12 inches dbh) snags with exfoliating bark to provide them with partial shade and some protection from windthrow. Limit openings in the upper canopy to single tree gaps within 30 feet each side of intermittent streams, with at least 75 feet distance between openings. Leave up to ten well-formed dogwood, serviceberry, and other soft-mast producers per acre during site preparation.

Soil and Water Management: Use brush barriers, silt fence, or hay bales to prevent visible sediment from entering streamcourses as needed. Revegetate all exposed cut and fill slopes within 30 days of initial disturbance. Revegetate and/or mulch disturbed soil at stream crossings the same day. Restrict operations to periods of dry weather. Comply with the LRMP standards and guidelines for road construction/reconstruction, and the forest practices guidelines and standards in the North Carolina Forest Practices Guidelines Related to Water Quality (BMPs).

Herbicide Use: Apply herbicides according to labeling and site-specific analysis; all formulations and additives must be registered with EPA and approved for Forest Service use. Use application rates at or below those listed as typical rates in the Record of Decision for the Final Environmental Assessment on Vegetation Management in the Appalachian Mountains (ROD, FEIS-Veg. Mgmt.); use selective rather than broadcast applications. Forest Service supervisors and contract representatives must be certified pesticide applicators. Sign treated areas in accordance with FSH 7109.11.

Apply no herbicides within 100 feet of public or domestic water sources; those not having an aquatic label will not be applied within 30 feet of perennial or intermittent streams. Mix herbicides at the District work center and dispense into application equipment on National Forest land at least 100 feet from surface water.

In addition to the above measures, apply all standards and guidelines for the appropriate MAs, as found in the LRMP, as amended. Also, apply all 99 mitigating measures found in the ROD, FEIS-Veg. Mgmt., and incorporated in the LRMP by Amendment #2 in July 1989, as needed.

DECISION RATIONALE:

The above-described actions are selected for implementation because Alternative C **best meets the purpose and need and specific project objectives**. This decision implements the direction in the Nantahala/Pisgah Land and Resource Management Plan (LRMP) and its amendments through the application of Forest-wide and management area standards and mitigating measures. **The specific project objectives for the proposal are met by the project actions as follows:**

1) Objective: Provide for a range of early successional habitat through timber regeneration harvesting and wildlife brushy openings, while producing at least one million board feet (1 MMBF) of sawtimber to the local economy.

The actions in the selected alternative, Alternative C, will provide regeneration harvesting on approximately 171 acres, which will result in early successional habitat for this acreage. With the addition of approximately 10 acres of new early successional habitat provided by wildlife activities, this 181 acres falls somewhat below the desired acreage range for early successional habitat within the project area. Although Alternative B would provide approximately 190 acres of early successional habitat (180 acres from timber harvesting and 10 acres of wildlife habitat creation), I believe that the group selection system as proposed in Alternative B is a less optimal silvicultural regeneration method than the two aged regeneration harvesting employed in Alternative C. Our experience with group selection on rich, highly-productive sites such as these has resulted in serious epicormic branching and considerable damage from vines. This is because more edge effect is created with the small groups (due to a longer total perimeter around the groups) than is the case with the larger two-aged units. More edge effect creates the potential for more vine and invasive plant problems, due to the larger amount of sunlight entering the edges of the groups than is the case with two-aged units. For this reason, implementing Alternative C is the **better choice** for this project.

2) Objective: Maintain and/or enhance biological diversity by protecting population viability of rare species which occur in the project area, and by reproducing existing forest species, especially oaks for hard mast production. Alternative C will accomplish **forest ecosystem restoration of desired species**; it accomplishes the restoration and **best** meets this project objective with the following project activities:

A. Population viability of rare species will be maintained or enhanced. Refer to the botanical, wildlife, and aquatic resource sections of the EA, the BE (EA Appendix C), and the Response to Public Comments (EA Appendix F).

B. Existing forest species will be reproduced, including oaks for hard mast production. The stands in which we will conduct two-aged regeneration contain components of oaks as well as other cove hardwood species. These will be regenerated by natural means, and the regenerated stands will be enhanced by the project timber stand improvements, invasive species treatments, and vine control. The 143 acres of two-aged regeneration in Alternative C are more than that proposed (116 acres) in Alternative B. The 218 acres of thinnings in the selected stands will allow some cove hardwood species regeneration by opening up the stands and increasing the amount of available light for the growth of new seedlings. There is more thinning proposed for Alternative C (218 acres) than for Alternative B (45 acres).

Slashing, burning, and planting of shortleaf pine in two stands (about 28 acres) in historical pine-hardwood stands will restore mixed shortleaf pine-upland hardwoods in areas where pine numbers are currently very low. There are 0 acres of this work proposed in Alternative B. Oak midstory preharvest treatment will be accomplished on approximately 300 acres in nine stands. Through this work, the midstory vegetative layer will be opened up, thereby encouraging the growth of advance oak regeneration and other cove hardwood species prior to the next harvest entry in 15-18 years.

C. Plantings of American chestnut seedlings (if commercial seedlings become available as expected) will be a first step toward establishing some blight-resistant chestnuts on the Nantahala Ranger District.

3) Objective: Create new grass/forb openings and create/enhance additional wildlife habitat where practical.

Alternative C contains several activities to improve or increase the amount of wildlife habitat in the project area. This includes the rehabilitation of 5 existing wildlife openings by removing the existing cover and reseeding them with an appropriate wildlife seed mixture which is more beneficial to area wildlife resources than the existing cover. In addition, 100-foot-wide brushy strips will be created around these wildlife openings.

Fifteen new vernal pools will be created for bats, frogs, and the spotted salamander. After timber sale closure, roads and landings will be seeded and maintained as wildlife openings. For Alternative C, additional grass/forb habitat will be maintained by spraying young saplings in the skid roads/trails of ten regeneration harvest units (approximately 143 acres) when the newly-regenerated stands are 4-8 years of age.

4) Objective: Improve habitat for the golden winged warbler where possible in the project area.

This objective will be met by the creation of 100-foot-wide brushy openings around the 5 existing wildlife openings in the analysis area, creating approximately 10 acres of new early successional habitat for the golden winged warbler.

ALTERNATIVES CONSIDERED:

Two other alternatives were considered in detail:

Alternative A: No Action. Under this alternative, the proposed project would not be implemented. Alternative A was not selected because it does not meet the purpose and need and specific project objectives stated in the EA (page 12). In particular, this alternative would not contribute to the desired future conditions for early successional habitat, would not maintain and enhance biological diversity by reproducing existing forest species, would produce no new grass/forb openings for wildlife habitat, would not improve any habitat for the golden winged warbler, and would not conduct any forest management activities for the improvement and/or restoration of existing forest stands.

Alternative B: This alternative was developed to address the issue of regeneration harvesting using group selection (an uneven-aged management system) versus intermediate treatments such as thinning.

Alternative B includes tree harvesting using conventional ground-based and skyline yarding systems, pre- and postharvest vine control, site preparation, natural regeneration, new stand improvement after the first growing season, crop tree release (timber stand improvement) treatments, roadside thinning, invasive species control, existing wildlife opening refurbishing, creation of new wildlife habitat, road construction and reconstruction, watershed restoration on one section of Forest system road, rare plant species habitat restoration, and understory planting of hybrid American chestnut trees in the proposed regeneration areas as available. Specifics are as follows:

A. Silvicultural treatments for the purposes of tree and stand improvement, and for forest regeneration, sustainability, and provision of early successional habitat:

Regenerate a total of approximately 116 acres by commercial timber harvest using the two-aged regeneration method (Table 2.2.2.1). These stands are all upland or cove hardwood mature sawtimber stands, aged 70 years or greater. Regenerate by the two-aged method, leaving an average of approximately 15-20 square feet of residual basal area per acre. Select available den trees and vigorous growers from the codominant crown class as leave trees, favoring mast producers where available. Harvest stands 88-5 (about 24 acres), 126-7 (about 25 acres), 126-45 (about 7 acres), the upper part of 126-47 (about 13 acres), and 152-38 (about 14 acres) by conventional ground skidding logging systems. Harvest stands 125-48 (about 10 acres), the lower part of 126-47 (about 12 acres), and 152-33 (about 11 acres) by skyline (cable) logging systems. Waterbar and seed skid trails, landings, and roads with an appropriate seed mixture following completion of logging activities. After harvesting, conduct site preparation for natural regeneration by chainsaw felling of residual nonmerchantable woody vegetation. Maintain the landings and roads as wildlife openings.

Dedicate a total of 389 acres to uneven-aged management in six stands (stands 125-15 (25 acres), 125-22 (95 acres), 125-49 (29 acres), 125-51 (23 acres), 126-20 (51 acres), 126-21 (about 144 acres), and 152-22 (22 acres)). **Regenerate the areas with small groups** (group selection) of approximately one acre each (Table 2.2.2.1). All of these stands except stand 152-22 contain regeneration harvesting by group selection from the previous harvest entry in the mid-1990s. Stand 125-15 would contain 5 groups (totaling about 11 acres), stand 125-22 would have 16 groups (about 16 acres), stand 125-49 would contain 5 groups (about 5 acres), stand 125-51 would have 3 groups (about 3 acres), stand 126-20 would have 8 groups (about 8 acres), stand 126-21 would have 24 groups (about 24 acres), and stand 152-22 would have 3 groups (about 3 acres).

Thin a total of approximately 45 acres by commercial timber harvest in stands 88-15, 88-33, and 152-32 (Table 2.2.2.1). Thin them to approximately 80 square feet of residual basal area per acre. Trees of all sizes are prioritized for removal in order to leave high-quality growing stock. Use conventional ground-based skidders to log all these stands.

At least two growing seasons prior to harvesting stands 88-5, 125-48, and 126-7 (totaling about 59 acres), **cut individual grape and smoke vines** in these stands, then spray the cut surfaces with triclopyr amine herbicide mixed 50/50 in water, or treat them with triclopyr ester/mineral oil in a backpack streamline spray. The vine control work is needed in order to

prevent prolific growth from existing vines immediately after units are harvested. The objective is to reduce grapevine and smokevine competition to newly-regenerating trees, not to eliminate vines from the stands. In each stand, existing grape arbors will be left, up to ½ acre per 10 acres.

Conduct grape and smoke vine control in the groups harvested in the last entry by group selection with the same methodology described in the above paragraph using triclopyr amine or triclopyr ester herbicide. Do this work in all existing groups in Compartments 125, 126, and 152 (47 groups on approximately 54 acres), and conduct manual release of ash, black cherry, and/or oak seedlings in the groups as needed.

After the first growing season, conduct timber stand improvement in all the newly-regenerated stands (about 116 acres) by controlling undesirable reproduction on stump sprouts (**stump sprout clumps only -no single stems**) of red maple, striped maple, silverbell, sourwood, dogwood, yellow poplar, and blackgum and individual grape and smoke vines as needed. Accomplish this work by backpack streamline spray application of triclopyr ester and imazapyr mixed in mineral oil.

Conduct an oak preharvest midstory treatment on approximately 300 acres in stands 88-18 (35 acres), 125-3 (36 acres), 125-6 (20 acres), 125-31 (31 acres), 125-33 (23 acres), 126-19 (27 acres), 126-24 (31 acres), 126-26 (53 acres), and 126-27 (44 acres). Treatment would consist of: 1) injecting trees with a diameter at breast height (DBH) greater than or equal to 1.5 inches and less than or equal to 10 inches DBH with a 50% solution of triclopyr 3A and water; and 2) streamline treatment of woody stems taller than 4 feet with a DBH of less than 1.5 inches with triclopyr 4E. All stems except oaks, ash, black cherry, and hickory would be treated. The purpose of this treatment is to improve species composition of the existing stands while encouraging the growth of advanced oak reproduction and regeneration of other desirable species in the stands.

Conduct a crop tree release treatment (timber stand improvement) on about 169 acres in stands 88-10 (about 25 acres), stand 125-20 (about 24 acres), stand 126-28 (about 23 acres), stand 151-8 (about 25 acres), stand 151-12 (about 13 acres), stand 151-24 (about 25 acres), stand 152-22 (about 11 acres), and stand 152-28 (about 23 acres). These stands are high-value sapling stands of cove and upland hardwoods currently ages 8-14 years. Treatment would consist of chainsaw slashing of vegetation competing with selected crop trees. In addition, competing grape and smoke vines would be slashed and treated with a 20% triclopyr ester/mineral oil solution or triclopyr amine mixed 50% in water.

As seedlings become available, conduct enrichment plantings with chestnut blight-resistant American chestnut seedlings in suitable areas of the proposed 2-aged regeneration stands. Prior to planting, conduct pre-harvest site preparation in the selected locations using an appropriate herbicide (triclopyr or glyphosate). After planting, conduct herbicide release at the planted locations as needed in each of several followup years. The planted sites would be evaluated by Nantahala district personnel and American Chestnut Foundation members for chestnut blight resistance and seedling competitive performance.

B. Treatments for the purpose of wildlife habitat creation and/or improvement:

Conduct wildlife opening work on 5 existing openings. Work would consist of reseeding 5 existing openings (totaling about 5 acres) with an appropriate wildlife seed mixture after disking or treating them with imazapic herbicide using a tractor sprayer. This is for the purpose of establishing grasses and forbs that are more beneficial to project area wildlife species than the existing cover.

Conduct existing wildlife opening manual slashing. Manually slash down and harvest all trees and vegetation in 100-foot-wide strips around 5 existing wildlife openings in the project area for the purpose of creating new habitat for the golden-winged warbler, a North Carolina Watch List species. Leave one or two wooded strips approximately 30-50 feet wide as wildlife corridors into each opening. This treatment would create approximately 10 additional acres of early successional habitat in the project area.

Create a new wildlife opening at the end of the newly-constructed segment of FS road #7225B1 (see paragraph C below). This opening would be approximately one acre and would be seeded with an appropriate wildlife mixture of grasses and forbs.

Use herbicide (triclopyr ester) in a backpack spray application to kill young saplings in the skid roads/trails of proposed two-aged regeneration units (10 units on approximately 143 acres). Conduct this treatment after the proposed units are harvested and the new stands are about 3-5 years of age. This treatment would be for the purpose of maintaining some grass/forb habitat in these new stands for a period of 5-10 years.

Create 15 circular depressions approximately 50 feet in diameter to serve as vernal pools, which are used by bats and the spotted salamander, a project management indicator species (MIS). Some of these would be on log landings, and some in wildlife openings or on roadsides.

C. Treatments to improve existing forest roads in conjunction with the proposed treatments in sections A and B above:

Selectively thin vegetation on the roadsides of the existing FS roads (main FS roads and their subsidiary roads A-D) in these compartments for 30 feet back from the roadbanks (FS Road #s 7225, 7250, 7290, 763, 7291, 7292, and 7293). This would include removing smaller-diameter, poor-quality trees and also mature and/or damaged large trees, leaving a residual basal area of approximately 70-80 square feet per acre. The purpose of this thinning is to increase available sunlight to the roads, thus allowing them to remain drier, and to remove existing trees which are currently growing in the roads or roadbanks.

Construct approximately 1.1 miles of new FS system road. This includes one segment, built onto the end of FS road #7225B1, through stands 126-20 and 126-21 in the Black Mountain area (refer to Alternative B map). The purpose of this road construction would be to access the northeastern part of Compartment 126 and stands 126-20 and 21. Road construction would occur over an existing old woods roadbed in this location.

Reconstruct approximately 1.2 miles of existing FS roads. This includes two segments: about 0.4 miles of FS Road 7293A, and a 0.8-mile segment of existing FS road #7250 to access stand 88-33 (refer to Alternative B map).

D. Treatments proposed for the control of invasive exotic species:

Remove invasive species (individual plants) such as multiflora rose, kudzu, and/or honeysuckle from existing compartment roads and/or roadsides as they occur. In addition, treat the invasive exotic species in the 7 stands to be regenerated by the 2-aged method (about 116 acres) with this treatment post-harvest (this would entail treating scattered individual plants at the same time the undesirable stump sprouts are treated) (Refer to Section A above). Use triclopyr or glyphosate in a backpack sprayer (ground application) to accomplish this work

In and around the edges of all existing wildlife openings, invasive exotic species not eliminated by the tractor spraying would be handsprayed with triclopyr (amine or ester formulation), using one or more applications as needed.

Design criteria for all proposed treatments: Follow Forest-wide and Management Areas 2A, 3B, 2C, 4C, 4D, and 14 general direction and standards as described on pages III-63 through III-70, pages III-71 through III-76, pages III-77-88, and pages III-148-165 of LRMP Amendment 5. In particular, **the following measures will be employed as part of this proposed action:**

Visual Resource Management: Proposed actions would meet the Partial Retention Visual Quality Objective (VQO) (LRMP Amendment 5 pages III-79-83) in the MA 4 parts of the project area. For the MA 3B portion, activities would meet the Modification VQO (LRMP Amend. 5, page III-72) in the general area and the Partial Retention VQO on sites visible from the Appalachian Trail.

Wildlife Management: The proposal would follow standards in LRMP Amendment 10 (USDA Forest Service, 2000) to minimize the risk of incidental take and conserve habitat for the Indiana Bat. It would comply with the terms and conditions listed in the U.S. Fish and Wildlife Service's Biological Opinion (B.O., April 2000). Retain as many snags and den trees as practicable. Designate and retain living residual trees in the vicinity of one third of all large (>12 inches dbh) snags with exfoliating bark to provide them with partial shade and some protection from windthrow. Limit openings in the upper canopy to single tree gaps within 30 feet each side of intermittent streams, with at least 75 feet distance between openings. Leave up to ten well-formed dogwood, serviceberry, and other soft-mast producers per acre during site preparation.

Soil and Water Management: Use brush barriers, silt fence, or hay bales to prevent visible sediment from entering streamcourses as needed. Revegetate all exposed cut and fill slopes within 30 days of initial disturbance. Revegetate and/or mulch disturbed soil at stream crossings the same day. Restrict operations to periods of dry weather. Comply with the LRMP standards and guidelines for road construction/reconstruction, and the forest practices

guidelines and standards in the North Carolina Forest Practices Guidelines Related to Water Quality (BMPs).

Herbicide Use: Apply herbicides according to labeling and site-specific analysis; all formulations and additives must be registered with EPA and approved for Forest Service use. Use application rates at or below those listed as typical rates in the Record of Decision for the Final Environmental Assessment on Vegetation Management in the Appalachian Mountains (ROD, FEIS-Veg. Mgmt.); use selective rather than broadcast applications. Forest Service supervisors and contract representatives must be certified pesticide applicators. Sign treated areas in accordance with FSH 7109.11.

Apply no herbicides within 100 feet of public or domestic water sources; those not having an aquatic label will not be applied within 30 feet of perennial or intermittent streams. Mix herbicides at the District work center and dispense into application equipment on National Forest land at least 100 feet from surface water.

In addition to the above measures, apply all standards and guidelines for the appropriate MAs, as found in the LRMP, as amended. Also, apply all 99 mitigating measures found in the ROD, FEIS-Veg. Mgmt., and incorporated in the LRMP by Amendment #2 in July 1989, as needed.

PUBLIC INVOLVEMENT:

This project was scoped beginning in April of 2008. A project Scoping Record with maps and a list of proposed actions was posted on the National Forests in NC internet website in order for individuals and groups to comment on the project proposal. Responses to the Scoping Record included letters or emails from Yolanda Saunooke – Eastern Band of Cherokee Indians, Josh Kelly and Steve Novak - Wildlaw, Hugh Irwin – Southern Appalachian Forest Coalition, Dave McHenry – NC Wildlife Resources Commission (NCWRC), Steve Henson – Southern Appalachian Multiple Use Council, Don Mallicoat – Ruffed Grouse Society, and 37 hunters and/or members of the Ruffed Grouse Society.

Since the April 2008 scoping, the project has been listed in the July and October NFsNC Schedule of Proposed Actions, which is distributed to several hundred individuals and groups throughout the United States.

A project Environmental Assessment (EA) was placed on the NFsNC website and a notification letter was mailed to the public for the 30-day public comment period, which began on October 30, 2008, and ended November 28, 2008. The legal notice for the comment period was published in the *Franklin Press* on October 29, 2008. Pursuant to 36 CFR 215, timely comments on the EA were received from 17 individuals or groups. Three additional comments were received, which were untimely. The timely comments are addressed in my Response to Comments, Appendix F to the EA.

FINDING OF NO SIGNIFICANT IMPACT:

After thorough consideration of the EA, Appendices, the Forest Plan (LRMP), and comments received, I have determined that the decision to implement this project is not a major federal action, individually or cumulatively, and will not significantly affect the quality of the human environment. In a local context (EA, pgs.5-10), the site-specific actions of the selected alternative (Alternative C), both short and long-term, are not significant. Therefore, an Environmental Impact Statement for this project is not needed. My determination is based on the following intensity factors:

INTENSITY/SEVERITY OF THE IMPACTS:

1. This project will have a beneficial effect on the local community. No significant adverse effects to the environment were identified in the environmental analysis (EA, pages 18-74). There is no irreversible commitment of resources in Alternative B. There are no known significant irretrievable commitments of resources. My determination that the effects are non-significant is not biased by any beneficial effects resulting from the project.
2. There will be no significant effects on public health and safety resulting from the work conducted on this project (EA pages 8-9, 73-74).
3. There will be no significant effects on unique characteristics of the area; there are no park lands, prime farmlands, wetlands, or wild and scenic rivers in the project area. (EA page 5).
4. Based on the involvement of forest resource specialists, state and federal agencies, and members of the public, I do not expect the effects of the selected alternative to be highly controversial in a scientific context. (EA, pages 18-74).
5. The effects of the project as described in the Environmental Assessment are not highly uncertain and do not involve unique or unknown risks (EA, pages 18-74). I am confident that based on past experience with actions of a very similar nature, there are no unknown or unique risks associated with this project.
6. No precedent will be set through this action which will contribute to future actions with significant effects; the project is site-specific and effects will remain localized and short-term (EA, pages 18-74).
7. No significant cumulative impacts will result from this action (EA, pages 18-74).
8. A Heritage Resources Survey of the project area has been completed. There will be no significant effect on historic or cultural resource sites (EA, pages 70-71).
9. There will be no significant effect on any federally listed threatened, endangered, or sensitive (TES) species or their critical habitat (EA, pages 45, 48-52, 56).

No cumulative effects on species viability across the Forest will result from this project (EA, pages 18-64).

10. The project will not threaten a violation of federal, state, or local laws to protect the environment. (EA, pages 18-74).

For water quality management, this project is designed to comply with the forest practices guidelines and standards found in the North Carolina Forest Practices Guidelines Related to Water Quality. These guidelines and standards have been designed with the goal of producing water that meets state water quality standards. The project will be monitored to ensure proper implementation. If effects on a specific site are greater than anticipated due to unforeseen site factors or events, appropriate corrective measures will be considered and implemented.

OTHER FINDINGS:

Forest Plan Consistency: Alternative C (as described above), is consistent with the Land and Resource Management Plan for the Nantahala and Pisgah National Forests (LRMP) and all Amendments to the Plan. The following paragraphs discuss the reasoning for this finding.

1. These actions are feasible and reasonable, and contribute to the desired future conditions identified as Forest Goals (LRMP, Amendment 5, pages III-1 and 2) The actions of this project harvest timber on those lands identified as suitable for timber production (Management Areas 2A, 3B, and 4D).
2. The actions of this project which alter vegetation comply with the seven requirements of 36 CFR 219.27, following Forest-wide direction and standards, and direction and standards for Management Areas 2A, 3B, and 4D.
3. Two-aged regeneration is an appropriate method of meeting LRMP objectives in 10 stands proposed for regeneration (EA, pages 5, 68-70).

APPEAL RIGHTS:

This decision is subject to appeal pursuant to 36 CFR 215.11. Any appeal of this decision must be fully consistent with 36 CFR 215.14, "Content of an Appeal", including the reasons for appeal, and must be filed with the Appeal Deciding Officer at this address: Forest Supervisor, National Forests in North Carolina, 160 Zillicoa Street, Asheville, NC 28801-1082. Appeals also may be faxed to (828) 259-0584 or electronically filed by sending them to appeals-southern-north-carolina@fs.fed.us. Appeals must be postmarked or received no later than 45 days, beginning the day after the legal notice of this decision is published in the *Franklin Press*.

IMPLEMENTATION:

Pursuant to 36 CFR 215.9, if no appeal is filed, this decision may be implemented on , but not before, the 5th business day following close of the appeal-filing period. If an appeal is

filed, implementation may occur on, but not before, the 15th business day following the date of appeal disposition.

CONTACT PERSONS:

For further information about this decision, contact Joan Brown. She may be reached at the Nantahala Ranger District, 90 Sloan Road, Franklin, N.C. 28734 (telephone 828/524-6441) or at comments-southern-north-carolina-nantahala-nantahala@fs.fed.us.

/s/ Michael L. Wilkins
MICHAEL L. WILKINS

2/2/09
DATE

DYLAN PROJECT
APPENDIX F TO THE EA
RESPONSE TO COMMENTS

NANTAHALA RANGER DISTRICT
FRANKLIN, NORTH CAROLINA

This is the Forest Service Response to Comments for the Dylan Project. An Environmental Assessment (EA) was available for a 30-day comment period beginning October 30 and closing on November 28, 2008. During this public comment period, seventeen electronic mail letters, one hard-copy letter, and one postcard were received. These letters were all timely (sent within the comment period 30-day time limits). In addition, three untimely letters were received. We have not responded to the untimely letters in this document.

This document is structured to state the issues raised as well as specific points within those issues, and the Forest Service response.

1) ISSUE: One comment voices concern about the grapevine control treatments proposed for several units, and recommends that, within each treated stand, a minimum 0.1-acre untreated area be retained.

RESPONSE: As stated on page 9 of the EA, the objective of grapevine control in newly-regenerated stands is to “reduce grapevine and smokevine competition to newly-regenerating trees, not to eliminate vines from the stands. In each stand, existing grape arbors will be left, up to ½ acre per 10 acres”. Thus, the treatments will exclude some existing arbors in all treated stands. In addition, plentiful grape and smokevine seed remains in the soil throughout the rich (north and east-facing) sites on which these treatments will occur. The treatments are targeted toward existing single vines, and will not eliminate the continuing vine seed source. Thus, retaining some vines in all of the treated stands will not be a problem.

2) ISSUE: Several comments mention several plant species they consider to be rare; therefore, they would like to see mitigation of proposed project activities to protect these species. The species are: *Calamagrostis porteri* (Porter’s reed grass), *Calystegia catesbiana ssp sericata* (Blue Ridge bindweed), and *Frasera caroliniensis* (American columbo).

RESPONSE: Two Forest Concern (FC) species (*Calystegia catesbiana ssp sericata* and *Frasera caroliniensis*) have been analyzed and the expected effects from proposed activities have been documented in the EA and Biological Evaluation (EA pages 58-60 and BE, Appendix C to the EA). Concerning the American columbo, Nantahala NF botanist Duke Rankin acknowledges its presence in several proposed harvest units. He says that columbo is quite common in the area, and in some cases, it is one of the dominant herbs in the stands. Duke states, “In addition, the analysis area contains large populations in other stands that will not be disturbed by the proposed actions. Although I agree...that considerable numbers of individual plants may be lost during harvest operations, I have no concerns regarding the viability of the species in the area, due to the large number of undisturbed plants in the immediate vicinity.”

For Blue Ridge bindweed, the EA (page 58) states that this species usually grows in highly-disturbed habitats, such as roadsides. Further, “Road maintenance may impact individual plants of *Calystegia* directly by mortality from heavy equipment. Because the plants sprout readily from deeply rooted rhizomes, however, direct effects will probably be short-lived, and unlikely to persist beyond 5 years. Because direct mortality would occur over a relatively short time period, indirect effects to gene flow among local populations would be minimal, and unlikely to affect the viability of the species.” And, a past timber stand improvement project on the Tusquitee Ranger District may have improved habitat for the species (EA page 58) by increasing the amount of disturbed ground and open habitat in the project area. In this project, the thinning proposed in stands 125-22 and 125-51 may, by creating some ground disturbance and more open ground, improve the habitat for this species, since individuals were located in these stands.

The other species, Porter’s reed grass, occurs outside the boundaries of stand 152-33 in adjacent areas. However, while being a Forest Concern species, it was not analyzed in the EA or BE because it was not found within this stand or any proposed project activity area during project area surveys.

3) ISSUE: One comment expresses disappointment that no prescribed burning other than the slash, burn, and planting units are proposed in the project.

RESPONSE: For understory prescribed burning, we are usually looking for drier oak/hickory/pine sites that are feasible and practical. Possible burn areas must be identified which have easily-accessible boundaries or for which those boundaries (control lines) can be economically created. In this project area, there are no such areas for which understory prescribed burning would be practical and beneficial to the existing habitats.

4) ISSUE: Some comments request that some large, contiguous blocks of mature forest be left undisturbed in order to promote habitat for wildlife species that require large areas with older forest conditions.

RESPONSE: Small old growth patches, each containing at least 50 acres, have been designated in each compartment of the project area. These areas are shown on the Alternative B and C maps in Appendix A of the EA (pages 76-78). As stated in the EA (page 69), “These stands were selected so as to be adjacent to the Appalachian Trail, and/or they were located along the higher ridgelines, which generally are more remote and include more old growth attributes such as old age, more down woody debris, declining stand/tree conditions, lack of stand disturbance, etc.” These small patches, some of which are larger than 50 acres, serve as undisturbed wildlife habitat. The patches on the south end of the project serve as connecting corridors to Compartment 151, which is in the Barker’s Creek Roadless Area.

5) ISSUE: One comment states that there is habitat for *Desmognathus aeneus*, the seepage salamander (a Federal Species of Concern), in the project area, and recommends exercising caution when conducting management activities near small streams.

RESPONSE: The seepage salamander, although a Federal Species of Concern on the U.S. Fish and Wildlife Service rare species lists, is not on our Forest Service lists of rare species to be surveyed for or considered when proposing management activities on the national forest. The commentor states that the stream habitat for this species is “ubiquitous in the project area”. All proposed management activities for this project include leaving riparian buffers along all perennial streams. We do not anticipate any negative impacts to any individuals of this species.

6) ISSUE: One comment expresses concern that the proposed regeneration harvests will simplify stand structure and decrease species diversity in those regenerated stands, since the stands proposed for regenerating are uneven-aged stands.

RESPONSE: We believe the stands proposed for two-aged regeneration harvesting are not all-aged or uneven-aged stands. These stands are primarily even-aged, due to the fact that they were logged in the early part of the twentieth century as part of the extensive logging that occurred across the Nantahala National Forest. After the logging, new stands regenerated, resulting in the even-aged stands we are now proposing to regenerate again. There may be scattered older individual stems within these stands, but their numbers are few and in the minority. Thus, there will be no simplification of stand structure as a result of the proposed harvesting in this project.

Concerning species diversity, we do not agree that overall diversity will be decreased as a result of the proposed regeneration harvesting. For every stand that we regenerate, we conduct tree regeneration surveys after three years, and these surveys indicate that we are not decreasing tree species diversity by harvesting the stands. Herbaceous plant **numbers** may decrease for a few years after harvesting, but they then recover somewhat within a few years post-harvest. Herbaceous species diversity is not decreased, according to a current study by B. Clay Jackson, graduate student at N.C. State University, et al (in press). He and his coresearchers studied second growth vs. old growth stands and found no significant difference in the number of species in these areas. Even so, some species diversity at the stand level would be acceptable.

7) ISSUE: Some comments express a desire for stands 152-33, 152-38, and 152-39 to be dropped from the project proposal, so that no regeneration harvest will be conducted in these areas. They assert that these stands are uncommon in that they are good examples of mature upland oak-hickory stands growing on amphibolitic soils (with a high pH). These soils may have the potential for the occurrence of richer and more diverse plant communities than might normally occur on sites with a similar overstory. Stand 152-33 may harbor individuals of *Calamagrostis porteri* (Porter’s reed grass), a rare plant which is known to occur upslope around High Knob and also in the adjacent compartment 151.

One comment states that these stands are within a “Mountain Treasure” area deemed by the Wilderness Society to be a backcountry area of important recreation and conservation value. This comment requests that stand 152-33 be designated as an old growth small patch. And, some comments express concern that harvesting stand 152-33 would enable exotic nonnative

invasive species to colonize the area, particularly the uncommon plant communities around High Knob.

RESPONSE: While we appreciate the regard for these particular stands, they actually are very typical-appearing upland hardwood oak-hickory stands that would be expected on east-facing slopes with good soils. Our Nantahala NF botanist found no rare plants located within the stands. These stands do not occur in an area which we consider to be “backcountry”. They are located in close proximity to NC state road 1104, which connects on both ends to U.S. Highway 441/23. National forest land is interspersed with private land throughout the area traversed by the state road.

For old growth, several stands have been previously designated along the ridgelines on the west and north side of this compartment 152 (see response to Issue #4 above). In addition, the whole adjacent compartment, #151, is in Management Area (MA) 5, which is land protected from any management activities. There has been no management in that compartment since the NFsNC Land and Resource Management Plan (LRMP) was drafted in 1987. Finally, with the demise of the originally-proposed road reconstruction for the FS road to stand 152-33 and the proposed use of logging forwarders instead, the likelihood of nonnative species’ introduction to the stand and the mafic cliffs upslope is diminished. For the reasons cited in these two paragraphs, we will keep these units in the proposed actions for Alternative C, the preferred alternative.

8) ISSUE: A comment is in disagreement with the statement in the EA (page 40) that down woody material is in a decreasing trend across the forest, due to recent reduced levels of timber harvesting.

RESPONSE: We understand and agree with the point you made in your comment letter. When the MIS list was revised, coarse woody debris (CWD) was associated with ruffed grouse habitat, presumably for drumming logs typically in areas of thick cover. So the analysis focused on CWD provided by timber harvesting. Previously it had been associated with black bear habitat, which should focus more on CWD overall. The MIS report (pgs. 78-84) describes the variability in CWD in different age classes and forest types and after various management activities.

At the project level, it would be difficult to determine whether the mature stands are old enough to increase the CWD loading in the short term enough to offset the bump resulting from timber harvesting. Given the small amount of timber harvesting forest-wide, it is reasonable to assume that the trend is increasing, although the amount of CWD available to ruffed grouse in 5-20-year-old stands is surely decreasing.

9) ISSUE: Some comments express an opinion that a Roads Analysis (RAP) should be conducted for this project, since FS Road #s 7293 and 7293A are not in a system road data layer recently obtained from the NFsNC Supervisor’s Office in Asheville. There is a question about which data layer is the official one, the Supervisor’s office’s or the district layer. Comments assert that a RAP should be conducted in order to identify opportunities for road decommissioning in this project area.

RESPONSE: Concerning conflicting GIS data layers, in checking with the NFsNC GIS Coordinator, it appears that an inadvertent error was made in the most recent GIS roads layer, and that FS Roads #s 7293 and 7293A were left out during the editing updates. These roads are currently on the FS system, and they have been maintained as linear wildlife openings, with a good grass cover, for many years. The NFsNC data layers are currently being migrated to a national server, so there will be no conflicts between SO and district layers...they will be the same.

A Roads Analysis for the project is not required, because there is no road construction, reconstruction, or change in access to any of the analysis area roads. Routine road maintenance will be performed by a timber purchaser on FS Road #7293 prior to implementing the timber harvesting operations for stands 152-33, 152-38, and 152-39. Road maintenance will not be conducted on FS Road #7293A, since it will not be used to access any proposed harvest units. The old woods road leading to the upper part of stand 152-33 will be traveled with a logging forwarder, and no prehaul maintenance will be conducted on it. If any disturbance to the road occurs, the timber purchaser will be required by the terms of the purchase contract to remedy any disturbance effects.

Refer to Forest Service Manual (FSM) 7700, paragraphs 7712.12 and 7712.13 for the criteria that determine the need for a Roads Analysis. Paragraph 7712.12 states that, “Implementation of road maintenance activities does not require a roads analysis before proceeding; however, roads analysis is a useful management tool to help set maintenance priorities”.

The EA states (page 74), “All existing roads are needed, and no changes would occur in the open road density. The current road management practices would not be changed with implementation of Alternative C. No FS roads in the project area need to be decommissioned at this time”. During the project prescription process, the existing system roads are observed by the prescriptionist, and watershed improvement needs are duly noted. Then appropriate work is prescribed as part of the project proposal. For the Dylan project, watershed (road rehabilitation) work in the “Punchbowl” tract east of Bates Mountain in Compartment 126 is part of the proposal, and this work will be conducted after project activities are implemented.

Because project road conditions have recently been observed in the field, and we have determined that no roads need to be decommissioned at this time, we will not conduct a RAP for this project.

10) ISSUE: Comments express concern that all future logging proposals on the Nantahala NF will be called “restoration” activity, since they assert that some logging may not actually be restoration work. One comment states that “The Dylan Project is being draped in the language of ecological restoration, while at heart being a logging project. There is nothing inherently wrong with logging and we see no reason why logging should falsely be labeled “restoration” and thereby bring the contention that surrounds logging on public land to the more broadly supported cause of ecological restoration”.

RESPONSE: On page 5 of the EA, section 1.1.2. **Description of the Proposal**, the proposed action is described as follows: “The proposed action includes tree harvesting using conventional ground-based and skyline yarding systems, pre- and postharvest vine control, site preparation, natural regeneration, new stand improvement after the first growing season, crop tree release (timber stand improvement) treatments, roadside thinning, invasive species control, existing wildlife opening refurbishing, creation of new wildlife habitat, watershed restoration on one section of Forest system road, and understory planting of hybrid American chestnut trees in the proposed regeneration areas as available”. Pages 5-9 of the EA enumerate and describe these proposed actions in detail.

Page 12 of the EA states the 5 **specific project objectives**, and we restate them here: 1) Provide for a range of early successional habitat through timber regeneration harvesting and wildlife brushy openings, while producing a minimum of 1 million board feet (MMBF) of sawtimber for the local economy; 2) Maintain and/or enhance biological diversity by protecting population viability of rare species which occur in the compartments, by reproducing existing forest species, especially oaks for hard mast production, and yellow pines to perpetuate mixed hardwood-pine or pine-hardwood communities; 3) Create new grass/forb openings and create/enhance additional wildlife habitat where practical; 4) Improve habitat for the golden winged warbler where possible; and 5) Conduct forest management activities in order to provide for improvement and/or restoration of existing forest stands within the area.

The Dylan project meets these objectives to varying degrees. Logging is one of many tools employed in conducting sustainable management activities in forest stands and for the creation or improvement of wildlife habitat. In addition, logging activities may result in restoration of some structural diversity of the forest on a watershed scale by creating different-aged stands across the landscape.