



United States
Department of
Agriculture

Forest
Service

National Forests in North Carolina
Pisgah National Forest
Grandfather Ranger District

109 E Lawing Dr
Nebo, NC 28761-9827
828-652-2144

File Code: 1950-1

Date: January 20, 2004

Dear Interested Citizen:

I have signed the Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the Steels Creek Project Environmental Assessment (EA) on the Grandfather Ranger District. The DN discusses in detail my decision and rationale for reaching the decision. Copies of the DN and FONSI and Appendix I – Response to Comments of the EA are enclosed. There are no changes to the EA other than the addition of Appendix I; therefore, final copies of the EA are only being mailed upon request.

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 McDowell News*. The Appeal shall be sent to the National Forests in North Carolina, ATTN: Appeals Deciding Officer, 160-A Zillicoa Street, Asheville, North Carolina 28801-1082. Appeals may be faxed to (828) 257-4263. Hand-delivered appeals must be received within normal business hours of 8:00 a.m. to 4:30 p.m. Appeals may also be mailed electronically in a common digital format to: *appeals-southern-north-carolina*.

Those who meet content requirements of 36 CFR 215.13 may appeal this decision. Appeals must meet content requirements of 36 CFR 215.14. For further information on this decision, contact Miera Crawford, Grandfather District Ranger, 109 East Lawing Drive, Nebo, NC 28761, phone number (828) 652-2144; or Michael Hutchins, Pisgah National Forest Zone NEPA Coordinator, PO Box 128, Burnsville, North Carolina, 28714, phone number (828) 682-6146.

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 not occur for 15 business days following the date of appeal disposition. (36 CFR 215.9)

Sincerely,

/s/ Miera Crawford
MIERA B. CRAWFORD
District Ranger

Enclosure



United States
Department of
Agriculture

Southern Region
Forest Service



January 2004

Grandfather Ranger District, Pisgah National Forest

Steels Creek Project

Decision Notice

Decision Notice
& Finding of No Significant Impact

Steels Creek Project

USDA Forest Service
Grandfather Ranger District, Pisgah National Forest
Burke County, North Carolina
Compartments 301, 302, 303, 304, 306, 307, 308, 309, and 310

Decision and Rationale for the Decision

Decision

Based upon my review of the alternatives, I have decided to select a modified **Alternative B** (Selected Alternative) of the *Steels Creek Project Environmental Assessment* (EA) on the Grandfather Ranger District, Pisgah National Forest and the Mitigation Measures listed in Section 2.5, Chapter 2, and Appendix G of the Steels Creek Project EA. The Selected Alternative will:

1. Regenerate approximately 322 acres in 20 timber stands using the two-aged silvicultural treatment. This will occur in stands 301-05, 301-11, 301-12, 301-19, 301-21, 302-01, 302-05, 303-11, 304-04, 306-03, 306-13, 306-14, 306-20, 306-33, 306-39, 307-21, 308-23, 308-24, 309-16, and 310-26;
2. Thin about 33 acres in 1 stand (307-14). White pine would be removed to within 30 feet of streams to favor hardwood regeneration;
3. Plant short leaf pine on a wide spacing, if needed, in stand 302-01;
4. Construct approximately 1.9 miles of new temporary roads (1.0 mile to access stands 303-09 and 303-11; 0.3 miles to access stand 304-04; 0.3 miles to access stand 306-39, and 0.3 miles to access stand 307-21). Temporary roads would be seeded with a grass mix and closed to vehicle access with earthen berms following implementation of the project;
5. Use and maintain the existing road system, including existing temporary roads;
6. Perform pre-harvest oak treatment in stands 303-10 (40 acres) and 308-20 (40 acres);
7. Perform timber stand improvement (TSI) on regenerated stands. Approximately three to four years following harvest, survey stands for adequacy of stocking and need for competition control. Release young trees from competing vegetation using selective herbicide applications (with the active ingredients Triclopyr and/or Glyphosate), if needed;
8. Use herbicides to control about one acre of invasive non-native (exotic) plants. Herbicides using the active ingredients Glyphosate or Triclopyr would be used to kill the invading plume grass (*Miscanthus sinensis*) located on Forest Service Road (FSR) 228; tree of heaven (*Ailanthus altissima*) located on FSRs 496, 228, State Highway 281, and stand 307-14; Japanese privet (*Ligustrum sinense*) located on FSR 496; and princess tree (*Paulownia tomentosa*) located on FSR 496;
9. Underburn about 200 acres between stands 302-01 and 308-23;
10. Designate approximately 15 acres in Compartment 308 in stand 13 for small patch long-term old growth retention as directed by the Forest Plan (page III-27) (the 15 acres are adjacent to an existing

medium patch of old growth in Compartments 307 and 308). Designate about 50 acres in Compartment 309 in stands 7 and 15 for small patch long-term old growth retention;

11. Daylight existing linear openings by cutting all 2 inch diameter plus vegetation within 15 feet on each side of the openings along Forest Service Roads (FSRs) 210A, 4211, and 4060. The total resulting clearance would be approximately 40 feet wide, with the existing linear opening being 8 to 10 feet wide plus the 30 feet total vegetation clearing – about 17.8 acres. This would result in a brushy or feathered edge of early successional habitat up to the grass/forb habitat, as well as allow daylight to grass/forb habitat, which is quickly disappearing due to shade. Proposed daylighting will be done based on access to timber sale units. Portions of the existing grass/forb habitat have been shaded to the extent where grass cover has been decreased or eliminated. These sections would be re-seeded with clover and native warm season grass/forbs, including fertilizer and lime application as needed, after timber sale activities are completed. The proposed action would utilize FSR 4211 to access stand 307-21. The Steels Creek analysis area grass/forb field openings and the linear grass/forb have a large component of fescue. The herbicide Imazapic has been found to eradicate fescue and not damage existing clover and warm season grasses. This herbicide is recommended for refurbishing these fields as necessary prior to re-seeding efforts rather than Glyphosate;
12. Plant fruit trees, including crabapple and persimmon, individually or in groups on log landings to provide food for a variety of wildlife species (8.25 acres); and
13. Expand the riparian buffer 300 feet on either side of Buck Creek from the confluence of Buck Creek and Steels Creek upstream about 2 miles to the fork in Buck

Creek (just below the existing harvested stand 304-31), a total of about 120 acres.

There are two modifications to the preferred alternative presented in the EA that I am authorizing with this decision. The first modification is a deferment in silvicultural treatment to stand 303-09 (25 acres). This stand was proposed to be treated with the two-age silvicultural prescription and harvested using cable yarding systems. After additional field review with resource specialists this past fall, I believe the commercial value of the stand at this time does not warrant the potential harvest costs. The second modification is a change in the silvicultural prescription of stand 304-04. After also reviewing this stand in the field last fall, a few old table mountain pines were located in the northern half of the stand and measured for diameter and age. Insects have also killed many of the white pine, reducing or eliminating their commercial value. I have decided not to harvest this portion of the stand using the two-aged silvicultural prescription, but instead will treat dead and dying white pine through non-commercial methods and reduce fuel loading through prescribed fire.

Rationale

As stated in Section 1.3 of the EA, the objectives of the proposal are, through harvesting and related activities, to:

- Improve the existing condition of timber stands while providing for a continuous supply of sawtimber and other wood products;
- Improve the existing condition of wildlife habitat, including the distribution and percent of early successional forest habitat and the distribution and percent of grass/forb habitat;
- Identify habitat to be retained as old growth;
- Reduce the amount of invasive, non-native (exotic) plant species; and

- Reduce fuel accumulations in a portion of the project area.

I believe the Selected Alternative will accomplish these objectives with management actions affecting only six percent of the entire 10,100-acre watershed.

One decision in particular, I would like to further discuss is the establishment of a 300-foot buffer on both sides of Buck Creek and the subsequent designation of this area as Management Area 18 - Riparian Area. I visited the Buck Creek drainage twice, once on September 19, 2003, by myself and again on January 8, 2004, with Forest and District resource professionals. The purpose of the visits was to follow-up on public input that old growth existed in the Buck Creek area. After much review and deliberation, I believe the 600-foot wide corridor is not currently suitable to be designated as old growth due to historic harvest activity (old road bed near the bottom of the drainage and old stumps) and the general lack of old growth characteristics within it. I acknowledge the existence of and have seen 100+ year old trees on one of the ridges in this drainage; however I believe the outstanding riparian qualities of Buck Creek necessitate designating the corridor as an enhanced riparian buffer and eliminating future harvest from within it rather than designating it as an old growth area.

Other Alternatives Considered

In addition to the Selected Alternative, I considered 2 other alternatives in detail. A comparison of these alternatives can be found in Section 2.3 of the EA.

Alternative A – No Action

Under the No Action alternative, current management plans would continue to guide management of the project area. I did not select this alternative for several reasons. This alternative would not have created early

successional habitat and the area would continue to be below Forest Plan standards for this type of habitat. Stands would continue to decline and their condition would not be improved, nor would a continuous supply of sawtimber and other wood products be produced. This alternative would not have improved on the existing grass/forb habitat in the area; would not daylight along existing linear fields, would not reduce the amount of invasive, exotic plant species, would not reduce fuel accumulations in the area; nor would it have identified habitat to be retained as old growth.

Alternative C

This alternative was developed to address concerns raised by members of the public concerning old growth and aquatic habitat. It dropped silvicultural treatment in stands 304-04, 307-21, and 308-20; reduced the amount of temporary road construction by about 0.6 miles; and would have designated about 120 acres of old growth habitat along a 600 foot wide corridor in Buck Creek. I did not select this alternative for several reasons. During fall of 2003, I visited several stands in the project area that some members of the public believed were suitable for old growth inclusion. After careful review, I believe stand 304-04 would not make suitable old growth habitat due to historic harvest activity, the general lack of old growth community characteristics within it, and it not meeting the minimum size required for small patch old growth (Forest Plan Amendment 5, page III-27). As a result, I believe it is more important to treat this stand now and address the lack of early-successional habitat in the area than to designate it as old growth. I believe other areas are more suitable for inclusion as old growth habitat and will include them in small patch old growth retention (see Decision item 10 above). I also believe it is important to treat stands 307-21 and 308-20 now because of the lack of early-successional habitat in the area and the general decline of tree health in stand 308-20. Access

to stand 307-21 will require two crossings (one a rock ford and the other a log bridge) over unnamed tributary streams to Steels Creek; however, I am confident after resource specialists have reviewed the area that the crossings as designed will not adversely affect aquatic species in the Steels Creek watershed (see also Section 3.1.3, Chapter 3 of the EA). This alternative also proposed to designate about 120 acres in the Buck Creek riparian area as small patch old growth. I chose to designate this area as Management Area 18 – Riparian Areas and not old growth because the Forest Plan old growth requirements will be achieved with the Selected Alternative without designating this additional 120 acres. I did identify a stand several hundred feet out of the bottom of Buck Creek that had several large, old hemlock, chestnut oak, shortleaf pine, and pitch pine in it, but the stand is less than 50 acres, the minimum size required for old growth designation (Forest Plan, Amendment 5, Page III-27).

Other Alternatives Not Considered

Section 2.2 of the EA disclosed 2 alternatives I considered but eliminated from detailed study. Since they were not considered in detail in the EA, they were not considered in the range of alternatives for my decision. That said I would like to correct a statement in my rationale for not considering Alternative 1 – Group Selection and Uneven-Aged Harvest. The EA disclosed in Section 2.2.1 that these types of prescriptions do not create early-successional habitat and thus do not meet Forest Plan standards. The group selection prescription can meet Forest Plan standards for early-successional habitat; however under this alternative the acreage of early-successional habitat created would have been very minor and would have required hundreds of acres of this type of treatment to attain the minimum early-successional habitat required by the Forest Plan. Additional information on the appropriateness of group selection and uneven-aged harvesting in the Steels Creek

project area is further disclosed in Appendix E of the EA.

Public Involvement

On June 23, 2003, a scoping letter explaining the proposal and requesting site-specific information on it was mailed to 70 individuals and organizations that expressed previous interest in management on the Grandfather Ranger District. In addition, the proposal appeared in both print and internet versions of the quarterly Schedule of Proposed Actions for the National Forests in North Carolina since October 2001. A legal notice requesting comments was also published in *The McDowell News* on June 24, 2003. Eight written and verbal responses were received during scoping.

On September 4, 2003, the Forest Service hosted a meeting requested by local environmental organizations to discuss old growth in the Steels Creek watershed. On September 12, 2003, the Forest Service hosted a field trip requested by attendees of the September 4th meeting to review key areas members of the public identified as old growth.

A 30-day review of the pre-decisional Steels Creek Project EA was initiated on November 8, 2003, and was completed on December 8, 2003. 177 individuals and organizations provided timely, substantive comments during this period. Appendix I, attached to this decision notice, discloses the comments received and the Agency's response.

Finding of No Significant Impact

After considering the environmental effects described in the EA, I have determined that these actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an

environmental impact statement will not be prepared. I base my finding on the following:

1. My finding of no significant environmental effects is not biased by the beneficial effects of the action (Section 2.4, Chapter 2; Sections 3.1, 3.2, 3.3, and 3.4, Chapter 3; and Table F-2, Appendix F, Steels Creek Project EA).
2. There will be no significant effects on public health and safety and implementation will be in accordance with mitigation measures (Section 1.7.2, Chapter 1; Section 2.5, Chapter 2; and Section 3.1.2, Chapter 3; and Appendix G, Steels Creek Project EA).
3. There will be no significant effects on unique characteristics of the area, because there are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas in the project area, nor are there local law or requirements imposed for the protection of the environment (Section 1.7.10, Chapter 1, Steels Creek Project EA).
4. The effects on the quality of the human environment are not likely to be highly controversial because there is no known scientific controversy over the impacts of the project (Section 1.7, Chapter 1 and Sections 3.1.2, 3.2.2, 3.3.2, and 3.4.2, Chapter 3, Steels Creek Project EA).
5. We have considerable experience with the types of activities to be implemented. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk (Sections 1.6 and 1.7, Chapter 1 and Sections 3.1.2, 3.2.2, 3.3.2, and 3.4.2 and Table 3-5 Chapter 3, Steels Creek EA).
6. The action is not likely to establish a precedent for future actions with significant effects, because the project is site specific and effects are expected to remain localized and short-term (Sections 1.6 and 1.7, Chapter 1 and Sections 3.1.2, 3.2.2, 3.3.2, and 3.4.2 and Table 3-5 Chapter 3, Steels Creek EA).
7. The cumulative impacts are not significant (Sections 1.7.2, 1.7.3, 1.7.4, 1.7.5, 1.7.6, 1.7.7, and 1.7.8, Chapter 1, and Sections 3.1.2, 3.2.2, 3.3.2, and 3.4.2, Chapter 3, Steels Creek Project EA).
8. The action will have no effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, because the two Class I sites and the three Class II sites are either avoided or protected (Section 1.7.3, Chapter 1, Steels Creek Project EA). The action will also not cause loss or destruction of significant scientific, cultural, or historical resources, because the Class I and Class II sites are either avoided or protected (Section 1.7.3, Chapter 1, Steels Creek Project EA). On January 15, 2004, the State Historic Preservation Office (SHPO) verbally concurred with the Forest Service's findings of no effect.
9. The action will not adversely affect any endangered or threatened species or their habitat that has been determined to be critical under the Endangered Species act of 1973, (Section 1.7.5, Chapter 1, Sections 3.1.2 and 3.2.2, Chapter 3 and Appendix B, Steels Creek Project EA). On December 2, 2003, the USDI Fish and Wildlife Service concurred that the proposed action was not likely to affect any federally listed or proposed endangered or threatened species.
10. The action will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA (Section 1.7.10, Chapter 1, Steels Creek Project EA). The action is consistent with the Nantahala and Pisgah National Forests Land and Resource Management Plan Amendment 5 (Section 1.1 and Table 1-1, Chapter 1, Steels Creek Project EA).

Findings Required by Other Laws and Regulations

My decision to implement the Selected Alternative is consistent with the intent of Forest Plan Amendment 5's long-term goals and objectives listed on pages III-1 and III-2. The project was designed to meet land and resource management plan standards and incorporates appropriate land and resource management plan guidelines.

Administrative Review and Contacts

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 McDowell News*. The Appeal shall be sent to National Forests in North Carolina, ATTN: Appeals Deciding Officer, 160-A Zillicoa Street, Asheville, North Carolina 28801. Appeals may be faxed to (828) 257-4263. Hand-delivered appeals must be received within normal business hours of 8:00 a.m. to 4:30 p.m. Appeals may also be mailed electronically in a common digital format to: **appeals-southern-north-carolina**.

Those who meet content requirements of 36 CFR 215.13 may appeal this decision. Appeals must meet content requirements of 36 CFR 215.14. For further information on this decision, contact Miera Crawford, District Ranger, Grandfather Ranger District, 109 East Lawing Drive, Nebo, North Carolina 28761, Phone: 828-652-2144; or Michael Hutchins, Pisgah National Forest Zone NEPA Coordinator, PO Box 128, Burnsville, North Carolina, 28714, Phone: 828-682-6146.

Implementation Date

As per 215.9, if no appeal is received, implementation of this decision may occur on, but not before, the 5th business day following the close of the appeal-filing period (215.15). When an appeal is filed, implementation may occur on, but not before the 15th business day following the date of appeal disposition (215.2).

/s/ Miera B. Crawford

1/16/2004

MIERA B. CRAWFORD
District Ranger
Grandfather Ranger District

Date

**APPENDIX I – RESPONSE TO COMMENTS
FOR THE
STEELS CREEK PROJECT
ENVIRONMENTAL ASSESSMENT**

Steels Creek Project
Environmental Assessment

Response to Comments

Interest 1:	Select Alternative C
Interest 2:	Wildlife Enhancement/Warm Season Grasses
Interest 3:	Old Growth Neutrality
Interest 4:	Select Alternative B
Interest 5:	Silvicultural Prescriptions/Herbicides for Timber Stand Improvement
Interest 6:	Prescribed Burning/Oak Regeneration
Interest 7:	Buck Creek Buffer
Interest 8:	Economics
Interest 9:	Road Construction
Interest 10:	Select No Action/Old Growth Protection
Interest 11:	Herbicides

General Discussion

The Forest Service received 177 timely letters or e-mails during the 30-day Notice and Comment Period for the Steels Creek Project Environmental Assessment and 3 untimely letters or e-mails. The formal comment period began November 8, 2003, and ended on December 8, 2003.

Substantive Comments

To be eligible to appeal the decision on this proposal, individuals must provide timely “substantive”, comments. Substantive comments are: “...within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider.” (36 CFR 215.2). A comment stating support of an alternative without rationale for the support is not considered substantive. Comments below are grouped by Interest. All respondents who provided substantive comments to that Interest are identified. Representative comments of the Interest are sometimes selected for Agency responses due to repetition of comments received.

Interest 1: Select Alternative C

Letters and Comments on this Interest Included:

Rob Messick	Patty Cunningham-Woolf	James Phelps	Blair Justice - Crystal Visions	Janice Rubino
	Suzanne Williams	Loveeta Baker	Dr. David Johnson	Donald De Bona
Anne Ulinski	Joshua Kelly	Andy Hessey		Nikki Smathers
Dan Kahn	Jacob Altemus	Ian Brownlee	Gregory Wilcox	Willaim Moye
Thomas Joyce	Wilson King		John Sherman	Phillip Coyle
Kirk Adcock	Mark Shelley	Gordon Bughardt	Betty Lawrence	Don Richardson
	Kyra Weinkle	Jordan Holtman		Patty Daniel
Kevin Bolton	Bill Goettman	Frank Adams	Kevin Norris	Mary & Don Berry
Bob McGahey	Glenn Ketner	Dr. Jac Tidwell	Carelien Wood	Charlotte Lackey
Andrew Phillips	Gib Barrus	David Sachter	Dana Villalás	Photobysi@aol.com
Jane Pickett	Brian Cole - USFWS	Andrew Kromis	Laura Bussanich	Mary Pat Riddle
David Ireland	Dr. Susan Bird	Eric Schneider	Mary Buckwalter	
Teresa Baltzel	Bob Gale - WNCA	Richard Fireman	Bill Thomas	Dr. Diana Richards
Jean McManus	Kay Cori ell	Scot Quaranda	Tex Teixeira	Ann Harris
Kathleen DeShayes		Jose Ruiz	Susan Drakeford	Devin Grobert
Corey Vernier	Will Gaddy	Sarah Wells	Judy McCarty	Dr. Douglas Wingeier
Geoff Nelson	Meg Hudson		Jeff Lovett	Corey Hadden
Brandon Calloway	Tema Milstein	Mark Donahue	Frank McKay	William Irving
Debra Roberts	Travis Herbert	Tom Dancer	Alan Coulter	Jay Armbruster
Bob Stout	Christine Hancock	Susan Daily	Scott Rankin	Ann Bryan
Trisha Haitz	Ethan Borg	Tom Daily	Dr. Michael Baranski	Judith Tincher
	Chris Manganiello		Ann Waters	Beth Hockman
Debbie Metcalf	Julie Brandt	Cynthia & Vincent Camilleri	Ben Saylor	Greg Cumberford - Gaia Herbs, Inc.
Jeremiah Gentry	Andrew George - National Forest Protection Alliance		Dr. Susan Snider	Remi Davis
Scott Kucera	Pamela Judson	Jody Whitehurst	Trish Anderson	Ian Randall

Weston Schempf	Richard Boyer	Raelin Hansen		Greg Barmby
Buffy Baker	Dr. Nicole Merola	Fred Schuldt	Danielle Tryka	Kelly Corbet
Rae Gaa	Jim & Judy Pierce	Dr. Zack Murrell	Dianne Riggs	Charles Miller
Gina Raicovich	Meredith Rose	Erica Nixon	Lisa Powell	Paul Teplitz
Pat Tompkins	Brady Robinson – NC Outward Bound	Rusty Sivils	Remi Davis	Maribeth Pierce
Alice Hawkins	Susie Hamrick Jones – Foothills Conservancy	Brandon Mack		

Comment Examples:

(a) *“Alternative C would keep logging activity away from two areas in Steels Creek watershed that are in, or adjacent to, the 1,549 acre cluster of class A and class B old growth forests. Watersheds in this cluster include Little Fork, Steels Creek (at the gorge and along parts of Ripshin Ridge), and Buck Creek (downstream of FSR 492).”* (Rob Messick)

(b) *“Alternative C would be a step toward recognizing the importance of the Steels Creek cluster of old growth forests mentioned above. This cluster should be designated as a mid-size old growth patch as indicated in the 1994 Land Management Plan for the Nantahala-Pisgah National Forests.”* (Rob Messick)

(c) *“Alternative C would keep logging activity out of stand 304-4 (B) along the main ridge north of Buck Creek. Two core samples were obtained in this stand on September 12, 2003, on an outing with USFS personnel and other individuals. These core samples were dried and mounted. They were later sanded and read with a 10x hand lens.*

Xeric Pine

-table mountain pine (130 years 41 cm dbh).

-table mountain pine 119 rings, and extrapolated to 151 years due to a pithy section of the tree (57 cm dbh).

A credible source, that was published in the summer 2003 issue of American Forests magazine (page 35) states that table mountain pine has an average lifespan of 100 years, and a maximum lifespan of 200 years. The core samples above show that trees in this stand exceed the average lifespan of the species. This fits a rigorous criteria for old growth put forth by some researchers; that some canopy trees exceed half of the known maximum age of a given tree species.” (Rob Messick)

(d) *The proposed small old growth areas in Alternative C are not based on ground-truthing, and do not take into account small old growth areas found in the Steels Creek watershed in the May 2000 Old Growth Forest Communities report.* (Rob Messick)

(e) *“Don't join the 10 percent of the population who own 90 percent of the resources in their ignorant mistreatment of our natural resources. Please adopt "Alternative C" as the least environmentally damaging and least advantageous to the corporate criminals who run this country. Please adopt "Alternative C". A concerned citizen who would like his children to experience forests instead of another parking lot brought to you by the friends of King George.”* (Kevin Norris)

(f) *“I urge the Forest Service to adopt "Alternative C" in the Pisgah Old Growth Forest. I encourage this proposal because it protects the 130-year-old Table Mountain pines and expands the protective buffer from 100*

feet to 300 feet a along the drainage riparian zone, which also includes old growth. Chosing (sic) "Alternative C" be be (sic) a positive step for the health of the Pisgah old growth forest. I urge that Alternative C be adopted in the final Decision Notice." (Andrew Phillips)

(g) "I recently learned of the timber sale in the Steels Creek watershed area (in Burke County) and would like to express some concern about the original proposal. I've learned that the originally proposed area for the timber sale had been identified as old growth according to the WNC Alliance Old Growth Study. We need to do what we can to preserve old growth in our forests. This is why I ask that you please support the alternate proposal, "Alternative C," which protects this old growth and expands the buffer zone." (Dana Villalas)

(h) "In light of the more beneficial old growth considerations and less road mileage contained in Alternative C, the WNC Alliance believes that this proposal will cause the lesser amount of ecological impacts of the two action alternatives. We are concerned that the Forest Service's preferred alternative is to carry out Alternative B. If the Forest Service is determined to proceed with the timber sale in Steels Creek, we urge the Grandfather District to adopt Alternative C, instead. As the EA states, this alternative would still carry out the goals of the Forest Plan, and adopting this proposal would reaffirm that the Forest Service has followed through in truly acknowledging and addressing concerns of the local public." (Bob Gale - WNCA)

(i) "Please include me among those calling for your final decision to select Alternative "C" on the Steels Creek sale. Fewer roads and less impact on old growth are good reasons. You are surely aware that timber sales never return money to the US Treasury in our part of the country, so please choose the alternative doing the least damage, if we must have any cutting or roading at all." (Bill Thomas)

(j) "Please protect the precious few remaining acres of old growth forest in this, our people congested Eastern U.S. Here are some amoung (sic) the many reasons why these rare places should be protected: Scientific Researchability (sic) (our modern scientists have a relatively small base of knowledge about mature North American East Coast ecosystems {consider how so many of our modern medicines are rooted in plant based medicine, for example}), Ecological History (no student can relate to a history lesson as well as to the memories from a visit to a living display of these old, established and balanced systems of life), Heritage (simply, these Eastern US old growth areas are national treasures - symbols and reminders of where this country originated from in the truest sense), There Are Better Alternatives To Harvesting Old Growth Trees (many more sustainable sources for everything from paper manufacture, to home building have already been discovered - we wont switch to these sources however, unless we stop granting access to the current, established, unsustainable sources)." (Geoff Nelson)

(k) "I write to urge you to adopt alternative "C" for Steels Creek. This is a good opportunity to protect old growth and maintain a high degree of integrity for this beautiful region. I understand as well that this alternative would mean less road building which further substantiates this alternative." (Tom Dancer)

(l) "On behalf of the growing medicinal herb farming and processing industry in Western North Carolina, I urge that you select "Alternative C" in the Steels Creek watershed timber sale. A recent study conducted by NC State University researchers at the Mountain Horticultural Crops Research and Extension Center (Fletcher, NC) now shows that greater (and sustained) economic value exists by leaving North Carolina's old-growth timber stands intact, to allow selected under-story land to support both wild-simulated medicinal herb horticulture and germplasm research.

As more and more Americans are seeking to complement their diets and fight common ailments with plant-based nutraceuticals and phyto-medicines, the value of intact old-growth forested watersheds has increased

significantly--many of these stands provide important germplasm varieties for badly needed medicinal herb cultivars. As North Carolina's once dominant tobacco-based agriculture continues to decline, medicinal herb horticulture in field crops as well as in non-timber forest stands will contribute significantly to our regional economy. Our old-growth forests will play an effective, critical role here that should not be overlooked." (Greg Cumberford)

Agency Responses to Interest 1:

(a) Timber management activities are not proposed in any areas that are designated as small, medium or large patch old growth (see also response to (j) below).

(b) The Forest Plan Amendment 5 identified the Steels Creek-Upper Creek-Wilson Creek area as one of "30 large patches from which areas will be designated for old growth management" (Appendix K, Forest Plan Amendment 5). The Steels Creek project analyzed old growth and determined large patch old growth acres were adequately designated; however, too few acres of medium patch old growth were designated. An additional 15 acres in Compartment 308 and 50 acres in Compartment 309 were identified for designation as small patch old growth to meet Forest Plan requirements (Appendix C, Steels Creek Project EA). Both action alternatives for Steels Creek meet Forest Plan requirements for large, medium, and small patch old growth.

(c) On September 4, 2003, USFS personnel met with Rob Messick and others to discuss old growth in Steels Creek. Mr. Messick stated he uses a method for finding old growth areas that the Great Smoky Mountains National Park initiated. He begins by reviewing old data (topography maps, aerial photos, past logging plans) to identify areas that appeared to be difficult to log in the past. He then goes out to the areas to look for large trees to bore. On September 12, 2003, Mr. Messick and others joined USFS personnel on a field review of Stand 304-04. The southern portion of the stand had been previously entered and harvested as evidenced by stumps and skid trails. A 60-year-old white pine was bored too. The northern portion of the stand did have large, old table mountain pine in it; however the stand had been heavily hit by the Southern Pine Beetle and was more suitable for a non-commercial treatment of slash-down and prescribed burning to restore the stand. This portion of the stand appeared to meet biological criteria for old growth designation (i.e. large, old trees, large logs, multi-layered forest canopies, gaps in the canopy, etc.), but it did not meet minimum Forest Plan acreage requirements (Forest Plan Amendment 5, page III-27). See also Other Alternatives Considered, Alternative C above.

(d) Stand 309-7 and stand 309-15 were part of the Forest's initial inventory of old growth. These stands total 50 acres and were proposed for old growth designation under Alternatives B and C. Stand 308-13 is adjacent to an existing medium sized old growth patch. It is 15 acres, but since it is adjacent to an existing old growth patch, the small amount of old growth added improves the overall patch. These areas have not been recently "ground-truthed". They were identified for inclusion as old growth based on existing electronic data.

(e) Preference for Alternative C is noted. For the record, the National Forests in America are owned by all citizens of the United States and no parking lots are proposed with this project.

(f) Preference for Alternative C is noted. The Selected Alternative does not harvest the 130-year-old table mountain pine located in the northern portion of Stand 304-04 (see Decision above) and provides a 300-foot buffer along Buck Creek (see item 13 under Decision above).

(g) Preference for Alternative C is noted. A field trip to select stands was hosted by the Forest Service on September 12, 2003. After review of Stand 304-04 (located at the top of the Buck Creek drainage), evidence of past harvest was identified in the southern portion of the stand including stumps, portions of logs removed, and old skid trails (see also response to (c) above). A 60-year-old white pine was also located. The northern portion of this stand was also field reviewed on 9/12/03 and some table mountain pine were found that were over 130 years in age. This portion of the stand is not scheduled for commercial harvest (see Decision above). The Selected Alternative provides a 300-foot buffer along both sides of Buck Creek (see item 13 under Decision above).

(h) Preference for Alternative C is noted.

(i) Preference for Alternative C is noted. See also response to comments in Interest 8 – Economics below.

(j) Old growth timber is not proposed for harvesting under any alternative. Under the Selected Alternative, only about 3.2% of the 10,120-acre watershed would be harvested and an additional one percent of the watershed would be designated old growth. There are individual trees over 120 years of age in the watershed, but the average age of timber stands in the project area is about 80 years old. The majority of the stands within the Steels Creek watershed were previously harvested in the late-nineteenth and early twentieth century. It is important to note that no alternative proposed harvesting old growth as designated by the Forest Plan (small, medium, and large patch sizes) and in fact, both action alternatives proposed additional small patch old growth than is currently designated (Appendix C, Steels Creek Project EA). Also, please note that research on eastern forests (Southern Appalachian forests in particular) is occurring on 6,300 acres in the Bent Creek Experimental Forest which is only about 50 miles southwest of the project area.

(k) Preference for Alternative C is noted.

(l) Preference for Alternative C is noted (see also response to (j) above).

Interest 2: Wildlife Enhancement/Warm Season Grasses

Letters and Comments on this Interest Included:

Leonard Harwood - Fish and Wildlife Conservation Council	Steve Henson - Southern Appalachian Multiple-Use Council
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Comments:

(a) *"We would recommend that the FS forgo the planting of warm seeded grasses until such time that it has been demonstrated that, this grass will survive the first growing season and, that it is more, or equally as beneficial to wildlife needs than would a variety of clovers or cool season grasses."* (Leonard Harwood)

- (b) *"We suggest that you seek to keep the leave basal area below 20 sq.ft./acre in the two-age regeneration areas to allow for the development of quality early successional habitats for wildlife and promote a better mix of natural regeneration for future stands."* (Steve Henson)
- (c) *"We are happy to see the proposed wildlife opening development, plantings and daylighting activities to help address the dire lack of diversity and early successional habitats in the analysis area."* (Steve Henson)
- (d) *"We would also encourage you to consider designating/restricting road uses (linear wildlife openings, bike riding, horseback riding, etc.) after the project is complete to reduce future conflicts."* (Steve Henson)

Agency Responses to Interest 2:

- (a) Research, conducted by Dr. Barnes of the University of Kentucky, has been completed on how he successfully established warm season grasses in about six weeks. This information was presented at a symposium attended by Forest Service and NC Wildlife Resources Commission personnel. The seed mixes proposed for this project are – 60 percent grass and 40 percent clover. In addition, warm season grasses provide habitat for some wildlife species that cool season grasses do not provide for as well.
- (b) Comment is noted. Leave basal area would not exceed 20 to 30 ft²/acre (Appendix E, Steels Creek EA).
- (c) Comment is noted.
- (d) Existing designated uses of roads would be maintained in the project area during and following implementation of the Selected Alternative except timber hauling from Stand 307-14 would be limited to January to March when the area is normally closed to the public (Section 2.5 Mitigation Measures, Chapter 2, Steels Creek EA). I will take under consideration your suggestion to designate the "post use" for any roads within the project area.

Interest 3: Old Growth Neutrality

Letter on this Interest Included:

Leonard Harwood - Fish and Wildlife Conservation Council
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Comment:

- (a) *"The addition of old growth on Buck Creek should correspond with elimination of old growth elsewhere. Roughly 76% of our National Forest in NC is "off limits" to vegetation management, and the addition of old growth patches must, at the very least, be in the unsuitable base."* (Leonard Harwood)

Agency Response to Interest 3:

(a) Standards for old growth designation set by the Forest Plan (pages III-26 – III-28, Forest Plan Amendment 5), are minimum standards and not maximums – acre neutrality is not required. The Agency attempts to designate old growth in riparian areas and unsuitable timber lands prior to suitable timber lands; however, to meet minimum standards and objectives, sometimes suitable timber lands are designated as old growth.

Interest 4: Select Alternative B

Letters and Comments on this Interest Included:

Leonard Harwood - Fish and Wildlife Conservation Council	Steve Henson - Southern Appalachian Multiple-Use Council	Ron Linville - NC Wildlife Resources Commission
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Comments:

- (a) *“We would recommend Alternative “B” as the preferred alternative.”* (Leonard Harwood)
- (b) *“We strongly support the ‘proposed action’ – Alternative B as detailed in the EA and hope that you move forward with the project as soon as possible.”* (Steve Henson)
- (c) *“Biologists with the North Carolina Wildlife Resources Commission support Alternative B as this alternative increases and enhances habitat diversity.”* (Ron Linville)

Agency Responses to Interest 4:

- (a) Preference for Alternative B is noted.
- (b) Preference for Alternative B is noted.
- (c) Preference for Alternative B is noted.

Interest 5: Silvicultural Prescriptions/Herbicides for Timber Stand Improvement

Letter and Comment on this Interest Included:

Steve Henson - Southern Appalachian Multiple- Use Council

Comment:

(a) *"We also applaud the use of herbicides in post harvest TSI activities versus the usual mechanical release at a later stage of stand development – thus allowing the stem densities to remain high for a longer period for wildlife purposes."* (Steve Henson)

Agency Response to Interest 5:

(a) Comment is noted.

Interest 6: Prescribed Burning/Oak Regeneration

Letter on this Interest Included:

Steve Henson - Southern Appalachian Multiple-Use Council
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Comment:

(a) *"It is quite refreshing to see some serious attention being given to advance oak regeneration treatments. We strongly encourage the USFS to pay more attention and address this developing problem of oak regeneration on the landscape."* (Steve Henson)

Agency Response to Interest 6:

(a) Comment is noted.

Interest 7: Buck Creek Buffer

Letter on this Interest Included:

Ron Linville - NC Wildlife Resources Commission

Comment:

(a) *"Concerning the additional riparian zone protection buffers and reduced merchantable timber, we offer the following recommendations for your consideration. We do not support the 300 foot buffer zone proposed in the EA. Selective removal of trees and thinning activities promote development of understory and midstory vegetation important for wildlife and provide additional opportunities for grass/forb acreage within the tract along riparian corridors. As previously indicated, these areas benefit terrestrial wildlife through enhanced biodiversity. Unless listed species are present in nearby aquatic habitats, selective harvesting techniques within the 300 foot buffer zone will be sufficient to protect aquatic habitat while providing enhanced terrestrial habitat values. Non-merchantable "poor" timber removal should be considered further as regeneration of poor quality timber may improve forest health as well as improve forage and habitats for species dependent on early*

successional forests. Less merchantable stands could be added to portions of the overall “better” timber sales. If this is not an option, non-commercial felling contracts could provide similar improved wildlife habitats. Another option may be to look at including poorer quality stands in stewardship contracts.” (Ron Linville)

Agency Response to Interest 7:

(a) The enhanced riparian buffer/old growth area was developed and analyzed after individuals questioned the need to harvest stands that a privately funded study identified as old growth or adjacent to old growth. Forest Service specialist’s field reviewed stands in question on September 12, 2003, September 19, 2003, and January 8, 2004. The enhanced riparian proposal was adopted due to the incised nature of the Buck Creek drainage, its proximity to the Mountains to Sea Trail, and the difficulty and added expense of harvesting timber within the 120-acre area. Future projects could develop opportunities for improving wildlife habitat of stands within the area, but the decision for the Steels Creek project will not.

Interest 8: Economics

Letters and Comments on this Interest Included:

Jacob Altemus	Liz Mahaffey	Mary Buckwalter	Jean McManus	Greg Cumberford
Bill Thomas				

Comments:

(a) *“I would like to add my voice to those who are for the complete protection of the old growth forests in North Carolina. The revenue generated from tourists will be far greater than the few who will profit from the exploitation/timbering of these irreplaceable (sic) trees.” (Liz Mahafey)*

(b) *“Please help save our old growth forests in North Carolina. Choose alternative C when voting. Old growth can't be replaced and as a taxpayer in North Carolina I NEED that old growth for health, both mental and physical. It provides more to the people standing than any money recieved (sic) from it's (sic) sale.” (Mary Buckwalter)*

(c) *“Please choose Alternative C for the timber sae (sic) in the Steels Creek Watershed in Burke County. I do not want to have any additional old growth forest cut from my public lands. I also agree with increasing the riparian protective buffer from 100 feet to 300 feet whether or not it includes old growth. I do not believe any Table Mountain Pines should ever be cut regardless of age. I would also like to see the absolute minimum number of miles of road built. I think not building additional roads is a good thing even if it means not being able to cut trees in a particular area. There are enough trees in commercial production that I do not think the National Forests should be used for timber sales any more. To continue cutting off the National Forest lands sends the message that the US government is trying to financially undercut the private timber grower. The federal government should not be in competition with private business. Thanking you in advance for protecting the old growth and wilderness areas in general.” (Jean McManus)*

(d) *“Please respect the needs of North Carolina's present and future generations for the myriad life-restoring services that intact old-growth forests provide. These precious services have real economic value that are lost*

forever once old-growth stands are logged. Steel Creek will be no different. North Carolina's last remaining old-growth forest stands should remain intact in perpetuity in order to preserve the precious biodiversity in medicinal plants which they harbor, let alone the numerous other ecosystem services they provide. If your decision is primarily an economic one, let me tell you, speaking as a NC executive participating in the robust \$36 billion US dietary supplements industry, that we need to preserve North Carolina's old-growth forests as an incomparable "high dividend yielding asset" that promises far more sustained value intact rather than logged." (Greg Cumberland)

(e) "Please include me among those calling for your final decision to select Alternative "C" on the Steels Creek sale. Fewer roads and less impact on old growth are good reasons. You are surely aware that timber sales never return money to the US Treasury in our part of the country, so please choose the alternative doing the least damage, if we must have any cutting or roading at all." (Bill Thomas)

Agency Responses to Interest 8:

(a) Old growth timber is not proposed for harvesting under any alternative (see also response to (j), Interest 1 above). While economics is a concern for this project, it is but one portion of the objectives this project was designed to meet (Section 1.3, Chapter 1, Steels Creek EA).

(b) Comment is noted – see response (a) above.

(c) Comment is noted – see response to (a) above. Harvesting timber with this project is not designed to compete with private timber companies. The silvicultural practices that would be implemented are designed to improve the condition of habitat, reduce fuels, reduce invasive exotic plants, and provide for a continuous supply of timber.

(d) Comment is noted – see response to (a) above.

(e) Comment is noted. The Steels Creek project is located within Burke County. From 1986-1999 Burke County received on average \$25,600 each year from the U.S. Treasury as a result of timber and other receipts collected. The County is expected to receive \$32,100 each year as a result of Public Law 106-393 – Secure Rural Schools and Community Self-Determination Act (report dated 3/1/02). Other Counties the Pisgah National Forest is within (Avery, Buncombe, Caldwell, Haywood, Henderson, Madison, McDowell, Transylvania, Watauga, and Yancey) received on average a total of \$212,600 each year from 1986-1999 (28% of the State's total funds received) and are expected to receive \$266,100 on average each year under P.L 106-393. In addition to direct revenue realized from harvest related activities (the salaries of mill workers, log truck drivers, or timber fallers), there are also indirect and induced revenues realized from businesses, governments, and individuals that benefit from the direct revenue being spread amongst other revenue in a community.

The objectives of the Steels Creek project are to: 1) improve the existing condition of timber stands while providing for a continuous supply of sawtimber and other wood products; 2) improve the existing condition of wildlife habitat, including the distribution and percent of early successional forest habitat and the distribution and percent of grass/forb habitat; 3) identify habitat to be retained as old growth; 4) reduce the amount of invasive, non-native (exotic) plant species; and 5) reduce fuel accumulations in a portion of the project area (Section 1.3, Chapter 1, Steels Creek EA) – while a

consideration of the project, it is more important to improve existing habitat in the project area than to return the greatest amount of revenue to the U.S. Treasury.

Interest 9: Road Construction

Letter on this Interest Included:

Bob Gale – Western
North Carolina
Alliance

Comment:

(a) *“We remain concerned about continued road construction in management proposals in both the Pisgah and Nantahala National Forests. Maps show that these forestlands have already been fragmented with roads that already reach into headwater drainage systems. It is neither desirable nor ecologically prudent to continue to construct new roads ever further into such areas. Even temporary roads cause extensive impacts during construction, and continue to serve as avenues for invasive species or illegal recreational use long after being gated closed. Both alternatives contain temporary road construction proposals, with Alternative C containing slightly less (.3 miles) than B.” (Bob Gale)*

Agency Response to Interest 9:

(a) It is true, that roads can cause adverse effects like erosion and habitat fragmentation. For this reason, temporary roads are the preferred method of entry for this project. Temporary roads are constructed to a lower standard than classified roads – they are meant to be used once or infrequently and not maintained as a road after use. They would be seeded with a grass mix and closed to vehicle access with earthen berms following implementation of the project.

Interest 10: Select No Action/Old Growth Protection

Letters and Comments on this Interest Included:

Fred Stanback	Joshua Kelly	Tom Jerdee	Keith Kessler	Don Richardson
Frank Adams	Bob McGahey	Liz Mahafey	Ben Kahn	Richard Fireman
Bob Gale – Western North Carolina Alliance	John Austin	Eric Cummings	Sarah Olliges	Douglas Ruley – Southern Environmental Law Center
Jenny Bath	Jeff Goodman	Graham Clayton Abee	Pam McLamb	Nicole Kahn
Matt Bagnell	Clark Tibbits	Keith Robinson	Daniel Kamin	Meredith Rose

Comments:

(a) *“As you all know, the greatest benefits from forests come from leaving them ALONE. And these are commercial benefits, accruing to all of us through improved carbon balance, watersheds, airsheds, biological diversity and many other benefits. The forest industries, however, prefer their one-time method which enriches*

the few at the expense of the many. Your mandate is to save the forests for all time, thus maximizing benefits for the greatest number of people. You are not the lapdogs of the timber barons. You are public servants paid by the taxpayers.” (Don Richardson)

(b) “yeah, save that old growth. at a time when the economy is crumbling, we need to look ahead. cutting down the big old trees will tear the foundation out from under the national forest system and leave less options for the future of WNC. WNC residents are already under tremendous pressure to carry on culture and survival. Although this may seem to alleviate many problems, the solution will be short lived. Wildlife and watershed vitality will certainly be compromised, and WNC will lose the forests that characterize the vibrance and beauty of our region. for the people and the wild, don't cut down the old growth.” (Ben Kahn)

(c) “The Western North Carolina Alliance has had a policy for several years supporting national legislation which calls for an end to commercial logging on national forests, while supporting management (which may include logging) for ecological restoration. In accordance with this policy, our organization supports the No Action alternative.” (Bob Gale)

(d) “Please, quit cutting down our forests. Also, if these lands are truly public, then where is my check? Once all the environment is destroyed by Bush and cronies like you, then what resource will you exploit next??” (John Austin)

(e) “Please do not log Old-growth areas of the Steele's creek region of the Pisgah national forest. I used to work in that region for North Carolina Outward Bound, and can vouch for the importance of those stands of old-growth for teaching import lessons to youth, from ecology to regional history to civic responsibility. There are other stands of forest to log that will not represent the same loss as will those old-growth areas. Please don't be prodigal with something that is essentially irreplaceable.” (Eric Cummings)

(f) “In honor of Dr. Don McLeod, professor of Botany at Mars Hill College, who past away last week, I implore you to preserve all old growth. This means no new roads into roadless area and no cutting in old growth.” (Jeff Goodman)

(g) “please do not spoil the area in question! we have enough roads and gas stations and cracker barrells (sic). what we NEED is the assurance that our children and grandchildren and so on can enjoy these mountains ON FOOT as I have done; not from an air-conditioned SUV. TOO many adverse consequences WILL follow and result in a forever-altered ecosystem: litter, new construction, animal and plant species reduction, etc. please opt for preserving this pristine area! ain't too proud to beg, so PLEASE!!!!!!” (Pam McLamb)

(h) “Among the action alternatives, Alternative B is extremely problematic because it would involve logging old growth forest. Given the limited volume of old growth forest remaining in North Carolina and the Southwest, logging this exceptional resource would carry significant environmental impacts which are inadequately addressed in the EA and which would require an Environmental Impact Statement. Beyond this, logging old growth would demonstrate poor stewardship of a rare and valuable feature of our national forests. Accordingly we most strongly urge you not to select Alternative B.” (Douglas Ruley)

Agency Responses to Interest 10:

(a) Alternative A addresses some of the individual's concerns. The Steels Creek project was not designed to provide benefits for a few "timber barons", but was through harvesting and related activities to: (1) Improve the existing condition of timber stands while providing for a continuous supply of sawtimber and other wood products; (2) Improve the existing condition of wildlife habitat, including the distribution and percent of early successional forest habitat and the distribution and percent of grass/forb habitat; Identify habitat to be retained as old growth; (3) Reduce the amount of invasive, non-native (exotic) plant species; and (4) Reduce fuel accumulations in a portion of the project area (Section 1.3, Chapter 1, Steels Creek EA). Harvesting some timber is a reasonable way of achieving these objectives (see also Sections 2.2.2 and 2.3.1, Chapter 2, Steels Creek EA and Other Alternatives Considered, Alternative A-No Action in the decision above.

(b) As the Finding of No Significant Impact (FONSI) discloses above in the decision, the proposed action will not adversely affect endangered or threatened species or their habitat and the actions will not violate Federal, State, and local laws or requirements for the protection of the environment (items 9 and 10, FONSI). See also response to comment (j), Interest 1 above.

(c) Support for Alternative A is noted.

(d) See response to comment (a) above.

(e) Old growth will not be harvested under any of the alternatives analyzed for the Steels Creek Project (see also Appendix C, Steels Creek EA and response to comment (j), Interest 1 above).

(f) Old growth will not be harvested under any of the alternatives analyzed for the Steels Creek Project (see also Appendix C, Steels Creek EA and response to comment (j), Interest 1 above). There is an inventoried roadless area adjacent (south) of the Steels Creek project area but is not within it.

(g) New roads constructed would be temporary and would be closed and seeded following harvest activities (item (d), Section 1.2, Chapter 1, Steels Creek EA). Also, please note that numerous on-the-ground field visits did occur in order to produce the EA and this decision document.

(h) Old growth will not be harvested under any of the alternatives analyzed for the Steels Creek Project (see also Appendix C, Steels Creek EA and response to comment (j), Interest 1 above).

Interest 11: Herbicides

Letter on this Interest Included:

Joshua Kelly

Comment:

(a) *"If logging does occur please refrain from using pesticides for regenerative (sic) treatments. Thinning (sic) with chainsaws and manpower is more expensive, but worth it both economically (creates more jobs) and environmentally. Thank you for considering these comments."* (Joshua Kelly)

Agency Response to Interest 11:

(a) Preference for not applying herbicides is noted. Potential adverse effects of using herbicides was analyzed in the EA and found to be a non-key issue (Section 1.7.2, Chapter 1, Steels Creek EA).