



United States
Department of
Agriculture

Forest
Service

National Forests in North Carolina
Pisgah National Forest
Appalachian Ranger District

PO Box 128
Burnsville, NC 28714-0128
828-682-6146

File Code: 1950-1

Date: September 28, 2005

Dear Interested Citizen:

I have signed the Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the Shadline Environmental Assessment (EA) within the Appalachian Ranger District, Madison County. The DN discusses in detail my decision and rationale for reaching it.

Copies of the DN and FONSI are enclosed. The August 2005 preliminary analysis has been modified and clarified to correct typographic errors and address issues and concerns raised by members of the public during the 30-day notice and comment period and to be more responsive to new information. The September 2005 EA is the result of this effort and is available on our web site (<http://www.cs.unca.edu/nfsnc/nepa/nepa.htm>) or 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 Asheville Citizen-Times*. 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@fs.fed.us**

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 Linda Randolph, Project Leader, Appalachian Ranger District at 828-622-3202 or Michael Hutchins, Pisgah National Forest NEPA Coordinator at 828-682-6146.

Sincerely,

/s/ Linda Randolph
for PAUL L. BRADLEY
District Ranger

Enclosure





United States
Department of
Agriculture

Southern Region
Forest Service



September 2005

Shadline Project

Decision Notice

And

Finding Of No Significant Impact

**Appalachian Ranger District, Pisgah National Forest
Madison County, North Carolina**

Decision Notice
& Finding of No Significant Impact

Shadline Project

USDA Forest Service
Appalachian Ranger District, Pisgah National Forest
Madison County, North Carolina

**Decision and Rationale for
the Decision**

Decision

Based upon my review of the alternatives, I have decided to select **Alternative B** (Selected Alternative) of the Shadline Project Environmental Assessment (EA – Section 1.3, Chapter 1) on the Appalachian Ranger District, Pisgah National Forest and the Project Design Features and Monitoring listed in Section 2.4, Chapter 2 and Appendix F of the Baldwin Gap Project EA. The Selected Alternative will:

- ◇ Harvest about 74 acres using the two-age regeneration method and harvest about 69 acres using the group selection method for about 3,929 ccf (hundred cubic feet);
- ◇ Construct about 0.5 miles of temporary road;
- ◇ Use and maintain the existing road and skid trail system;
- ◇ Site prepare and subsequently release, if needed with herbicide (Triclopyr) all stands being regenerated. Control invasive exotics along roads adjacent to harvest areas before they are cut and place notification signs along the Appalachian Trail. Control invasive grape with herbicide (Triclopyr) on about 33 acres in stand 423-23. For every 10 acres treated, ¼ acre of grape arbor will be maintained. Plant hard mast producing species where feasible including blight resistant American chestnuts if seedlings become available;
- ◇ Maintain Forest Service Road (FSR) 467 (Rich Mountain Road), and FSR 3524 (Shirley Brooks Road) by daylighting. Daylighting will be done along much of the length but will not be done where topography prohibits it or where no-harvest standards for perennial or intermittent stream crossings occur. Daylight and enhance linear grass/forb wildlife openings on ½ mile of skid road, FSR 3578 (Big Hurricane Road), and FSR (Neal Barnette Road). Following harvest, revegetate skid roadbed into clover/warm season vegetation to restore the grass/forb condition;
- ◇ Use Imazapic herbicide to eradicate fescue component in existing fields then refurbish them by using a clover/warm season grass mix, lime, and fertilizer within several existing wildlife fields in both analysis areas. Within these fields control other non native invasive plants. Autumn olive will be controlled but not eliminated in the fields;
- ◇ Following harvest, all landings constructed for harvest activities will be seeded with a clover and native wildflower seed mix and on smaller landings, an old variety species of apple or other fruit trees would be planted;
- ◇ Release all apple, pear, peach and persimmon trees in wildlife openings;
- ◇ Use herbicides (Triclopyr and Glyphosate) to control non-native, invasive exotic plants along Forest Service roads and trails within the Forest Plan Analysis Areas (AA). Two concentrated areas dominated by invasive exotic plants near Runion and on the Moye Tract will also be treated. Repeated treatments may be necessary annually over the next five years following effectiveness monitoring;
- ◇ Improve access to two wildlife openings. Work includes repairing a slide, reducing the size of water control structures, and installing a culvert;
- ◇ Develop two non-motorized, multi-use trails within the Polecat Forest Plan AA but not within the Moye Tract;
- ◇ Plant a row of yellow pine along the edge of fields in the Moye Tract adjacent to State Road 1304 (Paint Rock Road);
- ◇ Improve scenic vista on Mill Ridge by removing brush and saplings on about 1 acre using mechanical hand treatments and cutting and leaving the material;
- ◇ Designate 186 acres of small patch old growth in Compartments 420, 422, and 423; and
- ◇ Improve stand conditions in portions of Stands 425-10 and 425-12 that have been damaged by

southern pine beetle by slashing down and possibly selling some of the timber for firewood. This treatment would allow tree regeneration. In addition, this stand will be treated with herbicide to improve species competition and control invasive exotics.

Rationale

As stated in Section 1.4 of the EA, the purpose and need (objectives) for the proposal is to:

- ◇ Balance age-class distribution, improving timber stand conditions, and providing for a continuous supply of timber;
- ◇ Reduce competition and improving species composition in proposed harvest units through herbicide use;
- ◇ Control non-native invasive species through herbicide use;
- ◇ Create additional recreational opportunities by designating new non-motorized, multi-use trails in the Polecat Analysis Area and improving a vista on Mill Ridge;
- ◇ Improve conditions for wildlife by creating additional early-successional habitat, maintaining and enhancing existing linear fields, and planting a screen along highly accessible wildlife fields; and
- ◇ Improve wildlife field access and water quality by improving two access roads.

I believe the Selected Alternative will move the resources in the project area towards the desired future condition, achieving the purpose and need for the project while addressing the public concerns. (See Appendix G for public comment highlights and the Agency's response).

In reaching my decision, I began by once again reviewing the purpose and need for the project and all of the alternatives presented in the EA. I then carefully weighed the effects analyses of the alternatives analyzed in detail and the public comments received on the EA. The Shadline Interdisciplinary Team (IDT) conducted field surveys, database queries, and other localized research in order to determine the effects each alternative analyzed in detail could have on the area's ecology, including threatened and endangered species. During their analysis, they took a hard look at past, present, and reasonably foreseeable future actions that could be combined with expected effects from the Shadline proposal. I believe they provided me sufficient analyses and conclusions to make a reasoned decision.

Other Alternatives Considered

In addition to the Selected Alternative, I considered two other alternatives in detail: Alternative A – No Action and Alternative C. A comparison of these alternatives can be found in Section 2.5, Chapter 2 of the EA.

Alternative A – No Action

Under Alternative A, 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 balanced age-class distribution or provided a continuous supply of timber; reduced competition and improved species composition; controlled non-native invasive species; created additional recreation opportunities; improved wildlife conditions; nor improved access to existing fields or improved conditions of access roads. I believe it is important these actions be implemented to move the area towards the Forest Plan's desired future condition.

Alternative C

Alternative C was developed to address public concerns concerning trails developed in the Moye Tract and daylighting along existing roads. Alternative C proposed all other actions that Alternative B proposed; however, I did not select Alternative C because I believe daylighting along FSRs 467 and 3524 to develop additional wildlife habitat. The Selected Alternative will not develop the multi-use trail within the Moye Tract; similar to what was proposed with Alternative C.

Alternative Not Considered

Section 2.3 of the EA disclosed one alternative I considered but eliminated from detailed study. Since it was not considered in detail in the EA, it was not considered in the range of alternatives for my decision.

Public Involvement

The proposal was provided to members of the public and other agencies for comment during a 30-day scoping period that began on February 16, 2005. Sixteen members of the public provided written comments. Eight individual comments were received during scoping. On February 24, 2005, a public open

house was held in Hot Springs, North Carolina. Eight individuals signed in at the open house. The proposal was listed in each of the Forest's Schedule of Proposed Actions in April 2005 and July 2005.

A 30-day Notice and Comment period of the Shadline Project preliminary analysis was initiated on August 20, 2005, and was completed on September 19, 2005. Six timely letters or e-mails were submitted by members of the public during this comment period. A summary of the comments is attached to this decision notice in Appendix G. Following review of comments received, the August 2005, preliminary analysis was modified and clarified slightly to respond to public comments and new information (40 CFR 1503.4). Members of the public may request a copy of the updated September 2005 EA or access it from the Forest's web site at: <http://www.cs.unca.edu/nfsnc/>.

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 (Sections 3.1, 3.2, 3.3, and 3.9, Chapter 3).
2. There will be no significant effects on public health and safety and implementation will be in accordance with project design features (Section 2.4 Chapter 2; Section 3.9, Chapter 3; and Appendix F).
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 3.12, Chapter 3).
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 (Sections 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, 3.11, and 3.12, Chapter 3).
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 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, 3.11, and 3.12 Chapter 3).

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 (3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, 3.11, and 3.12 Chapter 3).
7. The cumulative impacts are not significant (Sections 3.1.2, 3.2.2, 3.3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, and 3.12, Chapter 3).
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 (Section 3.6, Chapter 3). The action will also not cause loss or destruction of significant scientific, cultural, or historical resources (Section 3.6, Chapter 3). A heritage report was completed for this project and mailed to the State Historic Preservation Office (SHPO) on July 8, 2005.
9. The action will have no effect on any endangered or threatened species or their habitat that has been determined to be critical under the Endangered Species Act (Act) of 1973 (Biological Evaluation, pages 45 and 59, Appendix A). On September 15, 2005, the US Fish and Wildlife Service stated: *"Based on the information provided in the subject report, we believe the requirements of section 7(c) of the Act are fulfilled."*
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. The action is consistent with the Nantahala and Pisgah National Forests Land and Resource Management Plan Amendment 5 (Sections 1.1, 1.2, and 1.4.1, Chapter 1).

Findings Required by Other Laws and Regulations

My decision to implement the Selected Alternative is consistent with the intent of the long-term goals and objectives listed on pages III-1 and III-2 of Forest Plan Amendment 5. The project was designed to meet land and resource management plan standards and incorporates appropriate land and resource management plan guidelines (Sections 1.1, 1.2, and 1.4.1, Chapter 1).

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 Asheville Citizen-Times*. 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@fs.fed.us

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 Linda Randolph, Project Leader, Appalachian Ranger District at 828-622-3202 or Michael Hutchins, Pisgah National Forest NEPA Coordinator at 828-682-6146.

Implementation Date

As per 36 CFR 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 (36 CFR 215.15). If an appeal is filed, implementation may occur on, but not before the 15th business day following the date of appeal disposition (36 CFR 215.2).

/s/ Linda Randolph

9/28/05

for **PAUL L. BRADLEY**
District Ranger
Appalachian Ranger District

Date

**APPENDIX G – RESPONSE TO COMMENTS
FOR THE
SHADLINE PROJECT
ENVIRONMENTAL ASSESSMENT**

General Discussion

The formal 30-day Notice and Comment period for the Shadline Project preliminary analysis began on August 20, 2005, and ended on September 19, 2005. Six timely letters or e-mails were submitted by members of the public during this comment period.

Substantive Comments

To be eligible to appeal the decision on this proposal (36 CFR 215.13), individuals must provide comments that are both timely [36 CFR 215.6(a)(i)] and substantive (36 CFR 215.2). Substantive comments are defined as: “*Comments 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.*” A comment stating support of an alternative without rationale for the support is not considered substantive. Comments below are grouped by commenter. The following individuals provided comments on the proposal:

- Commenter 1: Steve Henson, Southern Appalachian Multiple-use Council (SAMC)**
- Commenter 2: Dave McHenry, North Carolina Wildlife Resources Council (NCWRC)**
- Commenter 3: Matt Davis, Appalachian Trail Conservancy (ATC)**
- Commenter 4: Bent Prater, Southern Appalachian Biodiversity Project (SABP) and Wild South**
- Commenter 5: Hugh Irwin, Southern Appalachian Forest Coalition (SAFC) and WildLaw**
- Commenter 6: Brian Cole, United States Fish and Wildlife Service (USFWS)**

Letter 1 – Steve Henson, SAMC

Comment 1-1

“In general, we support the direction of the proposed activities as they will vastly improve this area for wildlife, provide a more balanced age-class distribution of forest structure, and provide needed wood fiber for local forest product industries. It is clear that there are opportunities through regeneration harvesting and wildlife opening development to achieve the desired conditions described in the proposal. As pointed out in your analysis, early successional structure is rapidly disappearing in the area and wildlife openings/fields are also deteriorating within the analysis area.”

Agency Response

Comment is noted

Comment 1-2

*“It is imperative to maintain a 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 – we note in your discussions of two-age regeneration that the target is under 25 sq.ft./acre of residual basal area – we urge you to keep it under 20.”*

Agency Response

As stated in Appendix D of the EA, “Basal area of leave trees should not exceed 20-30 sq ft/acre fifteen years after harvest so they would not hinder further growth and development of the new stand” except where additional basal area is needed for scenery concerns in relation to the Appalachian Trail (Section 2.4, Chapter 2). Basal area below 20 sq ft/acre is not required to meet objectives—basal area of 20-25 sq ft/acre as proposed meets early-successional objectives and Forest Plan (Forest Plan, page E-2).

Comment 1-3

“We also encourage you to make group selection openings as large as feasible and in close proximity to create better scenarios for wildlife needing this diversity of structure.”

Agency Response:

Group selection openings have already been established in the Rich Mountain Forest Plan analysis area from a previous project and are expected to be about ½ - 2 acres in size for this project (Section 2.4, Chapter 2). This meets management practices established by the Forest Plan (Forest Plan, page E-1).

Comment 1-4

“We support the efforts to develop new wildlife openings (fields) as they are obviously scarce in the area. We would also encourage providing an early successional edge (at least 100 feet deep around the opening) that would provide cover for numerous wildlife species that could take advantage of the opening’s browsing and bugging opportunities. Additionally, we strongly support the daylighting of the roads in the area, where feasible, to establish early successional/shrubby strips along the roads to allow protection for numerous wildlife species that will take advantage of the protection for access to the wildlife seeded roads (linear wildlife openings).”

Agency Response

Comment is noted. Additional removal of vegetation was not part of the proposal.

Comment 1-5

“We also support the use of herbicides in pre/post harvest, TSI activities, exotic invasive species control and other management activities.”

Agency Response

Comment is noted.

Comment 1-6

“It is widely recognized by wildlife specialists the benefits of regular prescribed burning to a number of important wildlife species across the landscape. We encourage you to consider a recurring burning plan for the area and increase the use of prescribed burns to accomplish wildlife and forest health objectives.”

Agency Response

The Scraggy Ridge Prescribed Fire near Rich Mountain implemented in spring 2005 on about 1,300 acres was done to reduce fuels and improve wildlife habitat. At this time no additional burning is planned.

Comment 1-7

“We also encourage you to clearly designate recreation uses of the roads after the project is complete to reduce future conflicts.”

Agency Response

Trail designation and signing near wildlife fields is part of the proposal.

Letter 2 – Dave McHenry, NCWRC

Comment 2-1

“The NCWRC is concerned about the lack of early successional habitat on National Forest lands in western North Carolina and supports timber harvest to create this habitat type. The agency also supports timber stand improvement practices although we do have concerns about the loss of soft mast species (grapes) in the proposed action alternative. Grapes are an important food source for many wildlife species in the region and grape vine thickets also provide cover as well as nesting habitat for songbirds. NCWRC biologists are pleased to see that 0.25 acre “grapevine arbors” will be retained in impacted areas. We would recommend creation of some grapevine arbors in other portions of the analysis area classified as unsuitable for timber management.”

Agency Response

Comment is noted. Additional grape arbor creation in the Forest Plan analysis areas (AA) is not part of the Shadline proposal. Future proposals would have to be developed to create this habitat.

Comment 2-2

“We support closure of wildlife openings to bike and horseback riding as outlined in the proposed action. We also request that trails be aligned outside of riparian areas and that crossings, particularly on any bike trails, are constructed with bridges to the extent possible to reduce erosion into streams.”

Agency Response

Trail designation would occur on existing roads. No new trails are proposed for development, thus no new crossings would be developed—either culverts or bridges.

Comment 2-3

“We do not see any proposed prescribed burning in the project proposal and would like to see some burning within the analysis area. We would propose some prescribed burning be conducted within the area where the recent wildfire burned on the French Broad River side of Rich Mountain. This would allow for creation of more open areas and an increase of native grasses and forbs over a large area. If the area is classified as suitable for timber management then we would support an area of repeated prescribed burning on a portion of the analysis area classified as unsuitable.”

Agency Response

No prescribed fire was proposed in the AAs as a 1,360 acre prescribed fire was approved under a previous decision and implemented in April 2005 between Rich Mountain and Tanyard Gap. The Agency does not propose to use prescribed fire in the area burned by the 2001 Larman wildfire in the immediate future because the area burned very hot, developed early-successional habitat, and additional early-successional habitat in the area is not seen as an immediate need.

Comment 2-4

“The NCWRC supports release and establishment of fruiting trees as noted and control of most of the non native invasive species listed. We are pleased to see that at least a portion of the stands of autumn olives located on Mill Ridge will not be eliminated. These stands have a long history of establishment and have become a focus area for bear, deer and bird hunters historically and elimination would result in negative public relations for the USFS and NCWRC.”

Agency Response

Comment is noted. Autumn olive would be controlled under Alternative B and eliminated and replaced with a suitable non-invasive species (Section 2.2.3, Chapter 2).

Comment 2-5

“The NCWRC does have concerns about the recent property acquired along the French Broad River (Moya Tract). Our agency is pleased to see that the proposed trail will not impact the tract and that some pine trees will be planted between the open areas of the Moya Tract and Paint Rock Road to eventually provide a degree of seclusion for wildlife using the property. The soil conditions, topography, and proximity to the large river corridor make the potential for excellent wildlife habitat even in its present condition. Excellent potential for development of quality early successional habitat also exists in addition to development of bottomland hardwood habitat. We think this acquisition deserves special planning consideration since it is generally of a higher wildlife habitat quality and lays in close proximity to the French Broad River.”

Agency Response

The Moya Tract was acquired after Forest Plan Amendment 5 was completed and thus has not been assigned Management Area designation. The location and make-up of the tract lends itself to an emphasis on wildlife and/or recreation management.

Comment 2-6

“The NCWRC also wishes to note that the Mill Ridge pond in the analysis area used to be hatchery supported under the Designated Public Mountain Trout Water program. It was removed from the program in part because of poor access and road maintenance issues. It could be reconsidered in the future if access improved.”

Agency Response

Comment is noted. The pond is heavily silted and as stated, poorly located for easy access. The Agency welcomes an opportunity to work with the NCWRC to determine the feasibility of improving the fishery, improving access, and future management at the pond.

Letter 3 – Matt Davis, ATC

Comment 3-1

“This email will serve as the official response of the Appalachian Trail Conservancy to the Shadline Project preliminary analysis. Overall, we believe this proposal will not result in any significant negative impacts to the Appalachian National Scenic Trail (A.T.) or its users. We thank your staff for the proposed features designed to minimize the affects of the two age harvest in stand 426-1 on users of the A.T.”

Agency Response

Comment is noted.

Letter 4 – Ben Prater, SABP

Comment 4-1

“Silvicultural Methods: -74 acres down to 20-25 ft² basal area—This is too low. -69 acres group selection—What size openings? You should drop some acres of proposed harvest from compartment 423 because the proposed harvest acres (26) exceeds the maximum harvest acre goal (18). PA, 69.”

Agency Response

The 20-25 ft² of basal area retained per acre is consistent with Forest Plan Management Practices (Forest Plan, page E-2 and Shadline EA, Appendix D). The group selection openings would be from ½ - 2 acres in size (Section 2.4, Chapter 2). Limits on harvesting are calculated at 3 levels, the analysis area level, the management area level, and compartment level. The total acres harvested do not exceed the maximum for any level. At the compartment level the maximum harvested within the compartment is 81 acres. There are 56 acres of proposed harvest within the compartment. The chart on page 69 of the August 2005 EA, which is the compartment level analysis, may be misleading because it lists maximums by management area. The limiting number is total harvest within the compartment; the breakdown was shown to illustrate how that number was calculated. At the management area level the maximum harvested within management area D is 235. The total proposed harvest acreage is 107.

Comment 4-2

“In general we are completely opposed to management action that necessitate the use of herbicides, including daylighting, some timber harvests, and management of wildlife meadows. We do understand that there is a growing problem with invasives that sometimes can only be practically approached by some use of herbicides. Therefore, where all precautions are used, where creating hospitable conditions for invasives is not part of the plan, and where there is effective follow-up and monitoring, we will not oppose the use of herbicides as part of the approach to controlling invasives.”

Agency Response

Comment is noted.

Comment 4-3

“Here you need to remove plans to daylight and plans to reduce stands to 20-25 ft. basal area. You also need a re-entry plan and a monitoring plan so that management can be adapted as needed.”

Agency Response

Alternative C did not propose daylighting and addresses this comment. The basal area would be reduced to stated range. Effectiveness monitoring of invasive exotic treatment is proposed (Section 2.4, Chapter 2).

Comment 4-4

“Avoid using herbicide to “improve species competition.” PA, 29. This simply encourages lazy land management—you should avoid creating situations where herbicide may be “needed.” Herbicide should be a management tool of last resort.”

Agency Response

Herbicide is used to efficiently and effectively meet management objectives.

Comment 4-5

“Do not used herbicide within 30 feet of UT 9, UT 11 of Little Hurricane Creek or along the French Broad River if there is any practical way to use mechanical treatment within the riparian area. See PA, 11.”

Agency Response

Herbicide use has been identified as the most efficient, effective method for reducing extensive grape arbors near these UTs that are competing with residual trees.

Comment 4-6

“Your PA is also misleading because it states that “No herbicide is . . . ground-applied within 30 horizontal feet, of lakes, wetlands, or perennial or intermittent springs and streams.” PA, 26.”

Agency Response

The rest of the Veg Mgt FEIS disclosed in the EA the commenter did not quote was, *“No herbicide is applied within 100 horizontal feet of any public or domestic water source. Selective treatments (which require added site-specific analysis and use of aquatic-labeled herbicides) may occur within these buffers only to prevent significant environmental damage such as noxious weed infestations. Buffers are clearly marked before treatment so applicators can easily see and avoid them.”* (Section 3.9, Chapter 3).

Comment 4-7

“If you come within 25 feet, you risk losing the forestry exemption and risk violating your own vegetation management rules. See PA, 26.”

Agency Response

Use of aquatic labeled herbicide is specified by the proposal within 100 horizontal feet of water. The analysis completed meets requirements for its use.

Comment 4-8

“Please update your section on Glyphosate to reflect resent research. PA, 25. We have included a fact sheet submitted with these comments to provide some of this recent information to the agency.”

Agency Response

The *Beyond Pesticides* publication on Glyphosate identifies the POEA surfactant used in Roundup as potentially hazardous. It is true that POEA is substantially more toxic to aquatic species than Glyphosate and substantially more toxic than other surfactants that may be used with Glyphosate. However, Foresters' Non-Selective Herbicide and Rodeo herbicide do not contain POEA. Rodeo is even labeled as an aquatic herbicide.

Comment 4-9

"We believe control of invasives should be a priority on the Forest, and so we are happy to see that you are participating in the National Forest Foundation grant project."

Agency Response

Comment is noted.

Comment 4-10

"We would like to see transects established in more heavily managed areas, including daylighted corridors, as well as in the selected Natural Heritage areas. We are sure that some management has become inappropriate as invasives have become a larger problem—this includes some logging and daylighting of roads."

Agency Response

See Comment 4-3 above.

Comment 4-11

"We are not surprised, but discouraged, to read that you expect "An increase of non-native plant species in the proposed activity area." PA, 36."

Agency Response

That statement has been removed from the updated September 2005 Shadline EA. As disclosed in the EA, *"It is expected that non-native plant species would continue to increase with or without planned activities."*

Comment 4-12

"We agree that "new road is the prime habitat for many exotic invasive plants." PA, 39. Please explain why you believe "it is less clear that temporary road construction is habitat for exotic invasive plants." PA, 39."

Agency Response

Temporary roads are not maintained as openings like system roads—they are allowed to revert back to previous forest conditions, reducing potential for establishment and spread of exotic invasive plants.

Comment 4-13

"It's interesting that you don't consider Wisteria to be invasive (PA, 39), but native grapevine you do. Grapevine is important for providing soft mast for wildlife."

Agency Response

Grapevine is recognized as an important soft mast producing plant for wildlife; thus the reason it would have ¼ acre arbors retained per 10 acres of treatment (Section 1.3, Chapter 1). Wisteria is classified as an invasive, but does not normally invade into the forest interior. The species of

wisteria located within the Forest plan AAs (near Lover’s Leap) is native wisteria (*Wisteria frutescens* – American Wisteria).

Comment 4-14

“Isn’t “galic mustard” really garlic mustard? PA 37, 38.”

Agency Response

Correct. This has been addressed in the September 2005 EA.

Comment 4-15

“We support the part of alternative C that abandons plans to daylight. This practice will save time and money by avoiding exacerbating the invasives problem—something that is truly labor-intensive to address.”

Agency Response

Comment is noted – see also Comment 4-2 above.

Comment 4-16

“You acknowledge the connection between daylighting and road creation and invasive plants explicitly on page 36, and implicitly when you write that the vast majority of non-native invasive species listed on pages 36-37 occur mainly along roads and in old fields.”

Agency Response

Invasive exotic species increase when stands are opened—this is recognized and addressed through project design and monitoring (Section 1.3, Chapter 1 and Section 2.4, Chapter 2).

Comment 4-17

“Please monitor and tract the effects of your actions so you can appropriately adapt your management to on-the-ground impacts.”

Agency Response

See Comment 4-3 above.

Comment 4-18

“Please include the cost of controlling invasives in these daylighted stretches over the next couple of decades in your efficiency analysis. We believe this will make alternatives that do not include this element more attractive.”

Agency Response

The only herbicide costs disclosed are those for site preparation as the efficiency analysis is designed to analyze timber-sale related costs, not all costs.

Comment 4-19

“Why not try to eliminate autumn olive?”

Agency Response

Alternative B proposes to control autumn olive and not eliminate it because there are some wildlife benefits associated with it—thus the reason the NCWRC planted it near wildlife fields. Alternative C proposes to eliminate it because it is an invasive species.

Comment 4-20

“Do not use stealth mentions of American chestnuts to establish their use on the Forest. Whatever is developed will likely be a hybrid with a Chinese chestnut. The introduction of a hybrid should be considered in an EIS with public involvement as required by NEPA.”

Agency Response

An EIS is prepared when there will or could be significant impacts (40 CFR 1502.1). Planting a blight resistant species of chestnut has not been identified as an action with significant effects as disclosed in the FONSI.

Comment 4-21

“Restore with local native grasses—look to Sumter for ways to start this project. We suspect the “native” plants you mention on PA 31 are actually from different regions.”

Agency Response

Restoration will be with native vegetation. Local sources will be used where possible.

Comment 4-22

“How will this proposal affect Morel harvest in the Polecat area?”

Agency Response

It would not affect morel mushroom harvest as no activities are proposed in the Larman Fire area with the Shadline project.

Comment 4-23

“Thank you for dropping Moyer Tract multi-use trail.”

Agency Response

Comment is noted.

Comment 4-24

“You must comply with state and federal water quality laws, including the Erosion and Sedimentation Pollution Control Act. For example, it is insufficient to state that “It is suspected that sediments from these sources are deposited in the natural vegetative filters before they reach areas of perennial water.” PA, 8 (emphasis added). You should monitor to see if this is a fact.”

Agency Response

This disclosure has been updated in the September 2005 EA.

Comment 4-25

“Since you will operate within “Silviculture activities are subject to the provisions of the Forest Practices Guidelines Related to Water Quality (15A NCAC 1I .0101 - .0209),” 15A NCAC 02B .0104 (v), and are exempted from the NC Sedimentation Pollution Control Act, § 113A-50 et seq., to the degree that they follow the Forest Practice Guidelines Related to Water Quality. §113A-52.01(2), 15A NCAC 01I .0101(a). (“Persons must adhere to the standards related to land disturbing activities in order to retain the forestry exemption provided in the N.C. Sedimentation Pollution Control Act of 1973 as amended in 1989.”).”

Agency Response

The proposal would adhere to Forest Plan standards, which incorporate North Carolina Forest Practice Guidelines and BMPs (Forest Plan, pages III-40 – III-42) and as such, the “[s]tandards related to land disturbing activities in order to retain the forestry exemption” would be met.

Comment 4-26

“Do not culvert Cook Branch.”

Agency Response

An un-named tributary to Cook Branch would be crossed in stand 425-13—Cook Branch would not be crossed.

Comment 4-27

“You state that the roads will be designed to avoid sedimentation and pollution of project area streams, PA, 9, but we know you are under budget and behind schedule on road maintenance already. Do not add .5 miles of temporary road to this burden, and instead of using proceeds from the timber sold from this project to maintain roads, use it to decommission them—2,684 miles of road is too many for the Pisgah/Nantahala National Forest. PA, 39.”

Agency Response

The ½ mile of temporary road would be rehabbed following implementation and would not be left on the transportation system to receive maintenance.

Comment 4-28

“To avoid the problem of removing trees accidentally felled across streams, see p. 10, do not log near streams.”

Agency Response

Forest Plan standards would be applied and logging would not occur along streams (Forest Plan, page III-187).

Comment 4-29

“You state that “because of negative survey results, it is unlikely that non-detected plant TES species occur in the activity area.” PA, 19. The truth of this statement depends on the rigor of your surveys. What times of year did you survey, how many repeat trips did you take, and what were the qualifications of those who did the surveys?”

Agency Response

The statement has been updated in the September 2005 EA. As stated in the BE, “*The proposed units were surveyed by David M. Danley, Forest Botanist on March 29, April 19, 20, May 27, June 30, 2005. All proposed units were visited at least once during this time. Additional botanical survey information was used from the Brigman Hollow Timber Sale (1992) botanical surveys conducted by Dianne Toleman in compartments 420 and 421 and The Mill Ridge Timber Sale (1993) botanical surveys conducted by David Danley in compartments 423, 424, 426, and 425. Other sources of information were: Inventory of the Natural Areas of the French Broad Ranger District, Pisgah National Forest (Hieman et. al., 1995) and the Paint Rock Botanical Report (Danley, 2002).*”

Comment 4-30

“Thank you for taking steps to protect Stellaria alsine.”

Agency Response

Comment is noted.

Comment 4-31

“Consider development on private lands nearby—Hot Springs is growing fast.”

Agency Response

The cumulative effects sections have addressed the known past, present, and reasonably foreseeable projects in the area that could cumulatively be added to the Shadline actions to cause adverse cumulative effects. The Hot Springs area is growing, necessitating the need for cell phone service and the proposal to install a cell tower on Rich Mountain—this was disclosed in the September 2005 EA (Sections 3.8 and 3.9, Chapter 3).

Comment 4-32

“In regards to impacts of roads, it is especially difficult to measure since additional temporary road building is apparently possible, PA 32, and some road improvement is being downplayed as “wildlife field access improvements.” PA, 34. Any such roads must be scoped ahead of time and cannot be added on an ad hoc basis.”

Agency Response

The statement has been updated in the September 2005 EA, *“The temporary road would be constructed to avoid runoff into area streams. In addition, silt fence, straw bales, or brush barriers would be placed along the length of the road where it parallels or crosses a stream as needed to control runoff and stream sedimentation.”* (Section 2.4, Chapter 2).

Comment 4-33

“By daylighting roads, you are increasing the impact of road areas.”

Agency Response

Daylighting would improve habitat for wildlife species that prefer more open, brushy interfaces between forests and openings and is proposed in a portion of the Shadline analysis area. Alternative C does not propose to daylight. As disclosed in the EA, *“Maintain Forest Service Road (FSR) 467 (Rich Mountain Road), and FSR 3524 (Shirley Brooks Road) by daylighting. Daylighting would be done along much of the length but would not be done where topography prohibits it or where no-harvest standards for perennial or intermittent stream crossings occur. Daylight and enhance linear grass/forb wildlife openings on ½ mile of skid road, FSR 3578 (Big Hurricane Road), and FSR 3514 (Neal Barnette Road). Following harvest, revegetate skid roadbed into clover/ warm season vegetation to restore the grass/forb condition.”* (Section 1.3, Chapter 1).

Comment 4-34

“Your discussion of Japanese Honeysuckle & Japanese Grass betrays a lack of understanding of what a cumulative impact analysis should be. You state that “the action alternatives would only slightly increase the populations of either of these species because their populations are so well established within the watershed and the amount of permanent open habitat needed for the establishment of these species is small.” PA, 97. Of course, a cumulative impact is supposed to take note of individually insignificant actions: “Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions, when added together, may have collective or cumulative impacts which are significant.” FS Handbook. The statement that the .5 linear miles of new habitat for these species “is less than the Forest trend of 107 miles per year,” PA, 97, adds no useful information to the analysis. Doubtless this statement could be applied to every mile of road constructed on the Forests—never have we seen a project for 107 miles all at once. What is clear is that your MIS species for invasives points toward an increasingly large problem. Please add to this analysis and modify your plans/alternatives as appropriate.”

Agency Response

These species are well established in the Shadline area and the proposal would develop only ½ mile of temporary road. Effectiveness monitoring would take place to ensure spread of invasive exotics is reduced.

Comment 4-35

“Alternatives are too similar—exact same acreage of harvest and miles of temporary road construction. The only difference in the final 2 action alternatives is daylighting. PA, 33.”

Agency Response

Alternatives are similar as public concerns and interdisciplinary team reviews did not identify significant issues to develop wide ranging alternatives. Alternative C proposes to eliminate autumn olive.

Comment 4-36

“You should develop for detailed study a restoration/conservation alternative. Since you classify logging as ESH creation, such an alternative is not unrealistic as you suggest on PA 31. The purpose of NEPA is to consider all reasonable alternatives, and the simple choice between 100% harvest and no harvest does not meet NEPA’s information-forcing purpose.”

Agency Response

A range of alternatives to meet the purpose and need to varying degrees and to be responsive to issues identified has been achieved for the project (Section 2.5, Chapter 2). A restoration alternative without harvesting was considered but eliminated (Section 2.3.1, Chapter 2). See also Comment 4-35 above.

Comment 4-37

“You state that “With any [harvest] method, there must be enough quantity and quality of timber to be removed to make a sale operable, i.e. economically feasible to log at a given stumpage price.” PA, 74. However, this is not apparently universally true, and it is misleading to state otherwise. For example, economics did not get in the way of harvest goals on the Baldwin Gap project. This commercial timber sale is slated to lose over \$20,000! Therefore, a requirement to make money, or even breaking even, is a false premise being used selectively and manipulatively.”

Agency Response

The Shadline project has been developed to be economically efficient from a timber sale standpoint (Appendix E). The Baldwin Gap proposal is outside the scope of this project.

Comment 4-38

*“We dispute your break-down of age classes in the analysis area. **How is it that only 1.5 percent of the forest is in the 0-10 year age class when “The area has suffered through several outbreaks of southern pine beetle” in the past 10 years?** PA, 40, 100. Also, how was the analysis area determined—as gerrymandering of political boundaries can result in different voter demographics, so can manipulation of analysis area boundaries end result in different age-class distribution.”*

Agency Response

Boundaries for Forest Plan Analysis Areas (AA) are determined by the Forest Plan and do not change over time. Pine beetle areas were mapped as part of the project. Beetle mortality occurred in pine stands in the Polecat AA. There are 296 acres (10%) of the Polecat AA in 0 -10 year age class.

Comment 4-39

"We are concerned that you will not include all 0-10 age class created through daylighting and group selection in your tracking, resulting in a slow transformation of the forest to a thicket over the next several years. See, e.g. PA 90, although earlier sections do not count daylighted areas as 0-10 year age class."

All proposed harvests including group selection cuts and daylighting are included in the estimate of acres proposed for harvest.

Comment 4-40

"Old Growth: Thank you for adding designation in response to scoping comments."

Agency Response

Comment is noted. Designation of small patch old growth was necessary to meet Forest Plan standards.

Comment 4-41

"Are you in any undesignated patches?"

Agency Response

There are no initial inventoried areas of old growth located with the project area.

Comment 4-42

*"Why no medium patch designations. PA, 72. You are very concerned about meeting ESH goals in the LRMP. It would be nice to see some of the same concern for meeting Old Growth goals. **Is 186 acres sufficient to meet plan objectives?**"*

Agency Response

Medium patch designation is only necessary in administrative watersheds of 2,500 acres that do not contain large patch old growth designation (Forest Plan, page III- 27).

Comment 4-43

"You state on PA. 99 that as of June of 2005 there was considerable wild turkey and bear use in an area heavily used by bikes and horses, yet on page 35 you state that "following trail designation there would be increased adverse effects to wildlife species that prefer linear wildlife grass/forb habitat." You must explain this inconsistency."

Agency Response

A wide variety of wildlife utilizes various habitats across the Nantahala and Pisgah National Forests. Human disturbance will displace wildlife from the immediate area, usually just for the duration of disturbance. However, with continual disturbance, as in a large number of horse back riders, hikers, or bicyclists throughout the day, wildlife that use this habitat may leave for similar habitat with less disturbance. Another common change in wildlife behavior caused by this disturbance is they will only utilize habitat during early morning or evening hours when disturbance is less frequent. Wright

and Speake (1975) found that with 100 hikers a day, Eastern wild turkey disappeared from the area of the trail.

Comment 4-44

“Each of these concerns is well founded and based on organized research and expertise. We at SABP feel that until each of these issues is effectively and completely resolved that actions must not take place within the Shadline Project area. The National Survey on Recreation and the Environment Public Survey Report conducted from November of 2001 to April of 2002 indicated the following top five issues relating to National Forest that the public felt were most important. They were ranked as follows: 1) Protecting sources for clean water; 2) Passing along National Forests for future generations; 3) Providing protection for wildlife and habitat; 4) Providing places that are natural in appearance; and 5) Protection of rare or endangered species. This is what the public wants from their National Forests. It is time that the National Forest Service provides these things. Our National Forests are a valued resource for many reasons and timber is only one at the bottom of a long list.”

Agency Response

Active management in the Shadline area is needed to achieve Forest Plan objectives. The five issues commenter provides from a public survey is also important to the Agency and the proposal has been designed to comply with Forest Plan direction and standards.

Letter 5 – Hugh Irwin, SAFC

Comment 5-1

“The Preliminary Analysis does not adequately identify timber harvest locations. The group selection units are not identified to stand and it is not practical to locate these units using the provided maps. ID team members were not able to identify stands where group selections would be conducted when asked about this (9/19/05 phone communication with Michael Hutchins). Project specifics should be readily available and provided to the public so that site specific comments can be made.”

Agency Response

Commenter contacted Michael Hutchins (Team Leader) less than 9 hours before the end of the 30 day notice and comment period with his request for the stand information. The commenter was informed to contact the Project Leader in Hot Springs for requested information; however the Project Leader was not contacted.

Comment 5-2

“In addition how are these small units to be tracked effectively if they are not adequately identified in the project documentation. Are the group selection areas and other early succession areas to be created (daylighted and slash down areas) delineated in GIS? Is there means within the new FS database FSVeg to track these smaller areas? If not, how are these areas and their conditions to be tracked through time? Will such early succession areas be adequately accounted for in future project decisions? Are there similar early succession areas (pine bark beetle kills, HWA kills, past management actions) that are not accounted for in this project?”

Agency Response

These small units will be mapped with a global positioning system (GPS) and incorporated into the stands database. The model FSVeg is capable of tracking smaller areas. All management activities will be tracked through time and accounted for in future project decisions. Stands that have been killed by southern pine beetle were mapped as part of this project and accounted for in the 0–10 age class. There are no areas killed by hemlock woolly adelgid within the Forest Plan AAs at this time.

Comment 5-3

“The BE states that all units were surveyed for T&E, sensitive, and locally rare species. Did these site specific surveys include all of the group selection units?”

Agency Response

Surveys for terrestrial TES and FC species occurred in the general vicinity of the group selection stands and in habitat most suitable for these species. However, not every group selection stand was surveyed for terrestrial species. Aquatic surveys occurred where there was water—since there are no streams within the group selection units, they were not surveyed for aquatic habitat. The Rich Mountain area was surveyed in 2004 for the 2005 Scraggy Ridge Prescribed Burn project. No TES were found during surveys for the Scraggy Ridge or Shadline project.

Comment 5-4

“Stands proposed for logging and thinning are proposed in close proximity to the Appalachian Trail. We oppose any actions that would impact views from the AT. Many of the stands proposed for logging are in view of the AT and would be in the foreground view from the AT. Road activity (brushing and gravel) also is proposed in close proximity to the AT. The PE also does not address how access would be provided to group selection units not along existing roads.”

Agency Response

The proposal has been developed with input from the Appalachian Trail Conservancy and meets with their approval (see Comment 3-1 above). Group select cuts will be accessed by existing old “woods” roads and new skid roads.

Comment 5-5

“The project area contains numerous stands that have been logged in the past 20-30 years. The cumulative effects of these past projects in conjunction with proposed projects should be addressed.”

Agency Response

Cumulative effects of past, present, and reasonably foreseeable actions that could be added to the Shadline proposal to cause adverse cumulative effects have been addressed (Sections 3.1.2, 3.2.2, 3.3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, and 3.10, Chapter 3). Stands harvested 20-30 years ago have effectively revegetated and are part of the existing condition of the Shadline area.

Comment 5-6

“Project level old growth surveys should be conducted in the project area per the Region 8 Old Growth Guidance. Any existing old growth that satisfies FS definitions of existing old growth should be protected as existing old growth. While stands are suggested for designation as small patch old growth, there is no evidence offered that these stands are the best or even good designations. Two of the stands designated as small patch OG are dissected by roads. The other (comp 420 stand 3) is adjacent to the AT and is already default OG because of management constraints. There are numerous stands older than the other stands designated OG. Why wasn’t age and other old growth characteristics used in the selection of the small OG patches?”

Agency Response

Small patch old growth has been designated to meet Forest Plan standards. Both Forest Plan AAs are limited in potential old growth—likely stands were designated where needed.

Comment 5-7

“The impact of roads, including temporary roads, is extensive and well documented. The roads proposed for the project include construction and reconstruction of 0.5 miles of temporary roads. Projects accompanying the Preliminary Analysis show proposed road construction that amounts to 0.5 miles. However, many of the group selection units are not on existing roads and show no road construction to them. Would accessing the group selection units necessitate additional road building above the 0.5 miles? Surely it is not being suggested that these units be accessed and timber removal accomplished through the use of skid trails.”

Agency Response

Group selection has one drawback over two-age harvesting—the need to revisit the area on a more periodic basis. Units are located in proximity to previously harvested group selection units and can be harvested with old “woods” roads and new skid trails. This is the second entry in this area for group selection cutting.

Comment 5-8

You should drop some acres of proposed harvest from compartment 423 because the proposed harvest acres (26) exceeds the maximum harvest acre goal (18). PA, 69.

Agency Response

See Comment 4-1 above.

Comment 5-9

“We believe control of invasives should be a priority on the Forest, and so we are happy to see that you are participating in the National Forest Foundation grant project. We would like to see transects established in more heavily managed areas, including daylighted corridors, as well as in the selected Natural Heritage areas. We are sure that some management has become inappropriate as invasives have become a larger problem—this includes some timber harvest and daylighting of roads.”

Agency Response

See Comments 4-9 and 4-10 above.

Comment 5-10

“We are not surprised, but discouraged, to read that you expect “An increase of non-native plant species in the proposed activity area.” PA, 36. We agree that “new road is the prime habitat for many exotic invasive plants.” PA, 39. Please explain why you believe “it is less clear that temporary road construction is habitat for exotic invasive plants.” PA, 39.”

Agency Response

See Comments 4-11 and 4-12 above.

Comment 5-11

“We favor management actions that minimize the use of herbicides. An alternative should have been developed for the project that does not include herbicide use. We do understand that there is a growing problem with invasives that sometimes can only be practically approached by some use of herbicides. Therefore, where all precautions are used, where creating hospitable conditions for invasives is not part of the plan, and where there is effective follow-up and monitoring, we will not oppose the use of herbicides as part of the approach to controlling invasives. Here you need to remove plans to daylight and plans to reduce stands to 20-25 ft. basal area. You also need a re-entry plan and a monitoring plan so that management can be adapted as needed.”

Agency Response

Herbicides are proposed as they are the most efficient and effective method for meeting objectives. See also Comments 4-2 and 4-3 above.

Comment 5-12

“Avoid using herbicide to “improve species competition.” PA, 29. This simply encourages lazy land management—you should avoid creating situations where herbicide may be “needed.” Herbicide should be a management tool of last resort.”

Agency Response

See Comment 4-4 above.

Comment 5-13

“Do not used herbicide within 30 feet of UT 9, UT 11 of Little Hurricane Creek or along the French Broad River if there is any practical way to use mechanical treatment within the riparian area. See PA, 11. Grapevines encroaching (described PA 11) is a native species? Grapevines attach themselves to young trees and grow into the canopy as these trees mature and do not ladder into mature trees from the ground. What past management caused this native species to become invasive? Mechanically cutting these vines should be sufficient control. What are the exotic invasives that are referred to in PA 11. These should be specified so that appropriate measures can be evaluated. Your PA is also misleading because it states that “No herbicide is . . . ground-applied within 30 horizontal feet, of lakes, wetlands, or perennial or intermittent springs and streams.” PA, 26.”

Agency Response

See Comments 4-5 and 4-6 above.

Comment 5-14

“If you come within 25 feet, you risk losing the forestry exemption and risk violating your own vegetation management rules. See PA, 26.”

Agency Response

See Comment 4-7 above.

Comment 5-15

“Please update your section on glyphosate to reflect resent research. PA, 25.”

Agency Response

See Comment 4-8 above.

Comment 5-16

“Contrary to the Table, PA, 39, wisteria is generally considered to be invasive. “galic mustard” should be changed to garlic mustard. PA 37, 38.”

Agency Response

See Comments 4-13 and 4-14 above.

Comment 5-17

“Water quality must be a key issue. Assuring water quality was a significant reason for creation of Eastern Forests. The FS must comply with state and federal water quality laws, including the Erosion and Sedimentation Pollution

Control Act. For example, it is insufficient to state that “It is suspected that sediments from these sources are deposited in the natural vegetative filters before they reach areas of perennial water.” PA, 8 (emphasis added). You should monitor to see if this is a fact.”

Agency Response

The proposal has been designed to meet water quality laws by adhering to Forest Plan standards (Best Management Practices, or BMPs), which are generally more stringent than state water quality laws. See also Comment 4-24 above.

Comment 5-18

“Since you will operate within “Silviculture activities are subject to the provisions of the Forest Practices Guidelines Related to Water Quality (15A NCAC 1I .0101 - .0209),” 15A NCAC 02B .0104 (v), and are exempted from the NC Sedimentation Pollution Control Act, § 113A-50 et seq., to the degree that they follow the Forest Practice Guidelines Related to Water Quality. §113A-52.01(2), 15A NCAC 01I .0101(a). (“Persons must adhere to the standards related to land disturbing activities in order to retain the forestry exemption provided in the N.C. Sedimentation Pollution Control Act of 1973 as amended in 1989.”).”

Agency Response

See Comment 4-25 above.

Comment 5-19

“Avoid actions that would necessitate putting the culvert Cook Branch because of the severe impacts to the stream substrate. To avoid the problem of removing trees accidentally felled across streams, see p. 10, do not cut near streams.”

Agency Response

See Comments 4-26 and 4-28 above.

Comment 5-20

“You state that the roads will be designed to avoid sedimentation and pollution of project area streams, p. 9, but we know you are under budget and behind schedule on road maintenance already. Do not add .5 miles of temporary road to this burden, and instead of using proceeds from the timber sold from this project to maintain roads, use it to decommission them—2,684 miles of road is too many for the Pisgah/Nantahala National Forest. PA, 39.”

Agency Response

See Comment 4-27 above.

Comment 5-21

“Consider development on private lands nearby for cumulative effects—Hot Springs is growing fast.”

Agency Response

See Comment 4-31 above.

Comment 5-22

“Cumulative effects are especially difficult to assess from the PA since additional temporary roads are apparently possible, PA 32, and some road improvement is being downplayed as “wildlife field access improvements.” PA, 34. Any such roads must be scoped ahead of time and cannot be added on an ad hoc basis. By daylighting roads, you are increasing the impact of road areas.”

Agency Response

See Comments 4-32 and 4-33 above.

Comment 5-23

“Your discussion of Japanese Honeysuckle & Japanese Grass fails to address the cumulative impacts. You state that “the action alternatives would only slightly increase the populations of either of these species because their populations are so well established within the watershed and the amount of permanent open habitat needed for the establishment of these species is small.” PA, 97. Of course, a cumulative impact is supposed to take note of individually insignificant actions: “Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions, when added together, may have collective or cumulative impacts which are significant.” FS Handbook. The statement that the .5 linear miles of new habitat for these species “is less than the Forest trend of 107 miles per year,” PA, 97, adds no useful information to the analysis. Doubtless this statement could be applied to every mile of road constructed on the Forests—never have we seen a project for 107 miles all at once. What is clear is that your MIS species for invasives points toward an increasingly large problem. Please add to this analysis and modify your plans/alternatives as appropriate.”

Agency Response

See Comment 4-34 above.

Comment 5-24

“Alternatives are too similar—exact same acreage of harvest and miles of temporary road construction. The only difference in the final 2 action alternatives is daylighting. PA, 33. Also an alternative should have been developed that did not use herbicides.”

Agency Response

See Comments 4-35 and 5-11 above.

Comment 5-25

“You should develop for detailed study a restoration/conservation alternative. Since you classify timber harvest as ESH creation, such an alternative is not unrealistic as you suggest on PA 31. The purpose of NEPA is to consider all reasonable alternatives, and the simple choice between 100% harvest and no harvest does not meet NEPA’s information-forcing purpose.”

Agency Response

See Comment 4-36 above.

Comment 5-26

“You state that “With any [harvest] method, there must be enough quantity and quality of timber to be removed to make a sale operable, i.e. economically feasible to log at a given stumpage price.” PA, 74. However, this is not apparently universally true, and it is misleading to state otherwise. For example, economics did not get in the way of harvest goals on the Baldwin Gap project. This commercial timber sale is slated to lose over \$20,000! Therefore, a requirement to make money, or even breaking even, is a false premise being used selectively.”

Agency Response

See Comment 4-37 above.

Comment 5-27

“Tracking and FS Veg: We dispute your break-down of age classes in the analysis area. How is it that only 1.5 percent of the forest is in the 0-10 year age class when “The area has suffered through several outbreaks of southern pine beetle” in the past 10 years? PA, 40, 100. Also, how was the analysis area determined—as gerrymandering of political boundaries can result in different voter demographics, so can manipulation of analysis area boundaries end result in different age-class distribution.”

Agency Response

See Comment 4-38 above.

Comment 5-28

“We are concerned that you will not include all 0-10 age class created through daylighting and group selection in your tracking, resulting in a slow transformation of the forest to a thicket over the next several years. See, e.g. PA 90, where daylighted areas are included as early succession although earlier sections do not count daylighted areas as 0-10 year age class. How will these early succession patches be tracked in FSVeg or other FS databases?”

Agency Response

See Comment 4-39 above. Previous group selection cuts are accounted for within the stands database. All proposed cuts including group selection cuts and daylighting areas will be tracked within FACTS (activity database portion of FSVeg database) when it is implemented in 2006. Previously we tracked groups in the CISC database by stand and maps of the sales.

Letter 6 – Brian Cole, USFWS

Comment 6-1

“Since we originally commented on this project, the following changes have been made to the preferred alternative: (1) the proposed multiuse trail through the Moye Tract was dropped for resource protection and (2) 186 acres of small-patch old growth are proposed for designation in Compartments 420, 422, and 423 within the Appalachian Trail corridor and the visual boundary along Highway 25/70. Though we have no objection to either of the action alternatives, based on the information provided, we favor implementation of Alternative C because a non-motorized trail would not be developed within the Moye Tract and because autumn olive would be eliminated from wildlife fields. Both of these actions will benefit native wildlife and ecosystems beyond those gained in Alternative B. Once again, we commend the USFS for their efforts to control invasive exotic species. Based on the information provided in the subject report, we believe the requirements of section 7(c) of the Act are fulfilled.”

Agency Response

The Moye Tract trail was dropped from the proposal due to new information identified and the need to protect existing resource conditions. The 186 acres of small patch old growth designation was added to the proposal due to the need to meet Forest Plan standards (Forest Plan, page III-27). Preference for Alternative C, efforts to control invasive exotic plant species, and fulfillment of section 7(c) requirements is noted.