STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR
20301 MAIL SERVICE CENTER • RALEIGH, NC 27699-0301

MICHAEL F. EASLEY
GOVERNOR

Petition of the Governor of North Carolina for Protection of National Forest System Inventoried Roadless Areas in North Carolina

March 9, 2006

North Carolina Background

North Carolina has over 1.2 million acres of land in the Croatan, Nantahala, Pisgah and Uwharrie National Forests. While National Forest lands are relatively small compared to the land base of the state and the amount of timberland, the locations of North Carolina's National Forests make them readily accessible to the over eight million residents. In addition to being a critical part of the state's travel and tourism industry, these National Forest lands are important to North Carolina's natural heritage, air and water quality, and wildlife habitat.

Inventoried roadless areas are a relatively small portion of the total National Forest land in the state, with the 173,890 acres of inventoried roadless areas comprising approximately 15% of the total National Forest acreage. Within the Pisgah and Nantahala National Forests, approximately 153,000 of the one million total acres have been identified as roadless. Within the Croatan National Forest, approximately 20,000 of the 160,000 total acres have been identified as roadless areas. The Uwharrie National Forest has no inventoried roadless areas.

Under current forest management plans, the U.S. Forest Service estimates that 19,500 roadless acres are in management areas that emphasize commercial timber harvesting; of that acreage, only half is actually suitable for commercial logging. The forest products industry is important to North Carolina's economy and should not be compromised. However, these numbers suggest that inventoried roadless areas can be protected with no significant impact on timber harvest levels.

The protection of inventoried roadless areas in the National Forest System has been of great interest to North Carolinians. Through the various comment periods on the roadless issue since 1998, the U.S. Forest Service has received approximately 50,000 comments from North Carolinians expressing their strong desire that roadless areas be fully protected.

At a time when North Carolina faces unprecedented pressures of population growth and development, protection of roadless areas secures the future of these pristine lands as part of the state's natural heritage. Moreover, these areas ensure clean drinking water for many mountain

communities, contribute to improving air quality, and provide prime wildlife habitat. They preserve viewsheds of the Blue Ridge Parkway and offer unique outdoor recreation opportunities, both functions that contribute to our state's vital travel and tourism industries. Thus, protection of roadless areas in North Carolina is important not only because public sentiment supports it, but also because of the unique environmental, economic, cultural, and recreational benefits these areas provide.

Petition Contents

The following sections meet the requirements prescribed in 36 C.F.R. 294.14, which outlines the information that must be included in a state petition.

(1) The location and description of the particular lands for which the petition is being made, including maps and other appropriate resources in sufficient detail to enable consideration of the petition.

North Carolina's petition includes all inventoried roadless areas identified by the U.S. Forest Service in their inventory of roadless lands within the Nantahala/Pisgah National Forests and the Croatan National Forest. The 2001 Roadless Area Conservation Rule Final Environmental Impact Statement identifies the inventoried roadless areas in North Carolina (November 2000 FEIS; copies of maps are attached). These roadless areas are also identified and named on a map prepared by the U.S. Forest Service in May 2005 for the Nantahala and Pisgah National Forests (a copy of which is attached). The roadless areas in the Croatan National Forest are also described in the 2002 Final Environmental Impact Statement for the Croatan Revised Land and Resource Management Plan (a copy of the description is attached). The total acreage included in North Carolina's petition is approximately 174,000 acres, and the inventoried roadless areas and acreages are listed in Appendix I.

(2) The particular management requirements recommended for the lands and any exceptions.

North Carolina requests that all inventoried roadless areas be managed under the provisions of the 2001 Roadless Area Conservation Rule, 36 CFR Part 294, as published in the *Federal Register* January 12, 2001 (hereinafter referred to as the 2001 Rule). In short, the 2001 Rule prohibits the construction or reconstruction of roads in inventoried roadless areas of the National Forest System, subject to limited exceptions. Furthermore, we ask that the provisions of the 2001 Rule be incorporated into this petition as the "particular management requirements" with no exceptions. It is our understanding and contention that these management requirements do not change the state's or private landowners' right to access their land.

(3) The identification of the circumstances and needs intended to be addressed by the petition including:

- ***Conserving Roadless Area Values and Characteristics***

The roadless areas in North Carolina are integral to our state's natural heritage and tourism economy. For instance, included in the inventory of roadless areas is the Cheoah Bald Roadless Area located in Graham and Swain Counties. This area, which provides prime habitat for black bears and spectacular views of the Nantahala Gorge, is a favorite spot for hunters and hikers. The vitality of North Carolina's travel and tourism industry, as well our state's natural and cultural heritage, depends on preservation of areas like Cheoah Bald. Moreover, our state

continues to lose private forestland at one of the fastest rates in the nation because of development pressures, making roadless areas in our National Forests of even greater ecological, cultural, and recreational importance.

Many of the roadless areas in North Carolina lie in close proximity to the Blue Ridge Parkway, an important economic resource for the region. The Parkway is a nationally significant scenic roadway that receives more visits than any other National Park unit, with 19 million visitors in 2000. Fourteen of the inventoried roadless areas are within three miles of the Parkway, and most of these fourteen areas are adjacent to it. Their close proximity to the Parkway makes these areas vital to preserving the Parkway's scenic viewsheds and maintaining its appeal for the millions who visit each year.

- ***Protecting human health and safety***

North Carolina has taken action in recent years to improve the air quality in our state, including enactment of the Clean Smokestacks Act of 2002, which requires coal-fired power plants to substantially reduce emissions of harmful pollutants. The Clean Smokestacks Act, in large measure, was approved in an effort to halt deteriorating air quality in western North Carolina. While we have already taken significant steps to improve our state's air quality, North Carolina will continue to move forward in this area through innovative approaches and partnerships. Maintaining and preserving all of our inventoried roadless areas can only serve to support our ongoing efforts in improving North Carolina's air quality, particularly in our mountains.

In addition to air quality benefits, National Forest lands play a critical role in the water quality of our state. Many of the roadless areas in the Nantahala and Pisgah National Forests fall entirely or partially within watersheds that the Division of Water Quality in the North Carolina Department of Environment and Natural Resources (NC DENR) has classified as High Quality Waters (HQW) or Outstanding Resource Waters (ORW). The HWQ classification is used for those waters possessing special characteristics, including excellent water quality. The ORW classification is used for unique and special surface waters that are unimpacted by pollution and have an outstanding resource value, such as special ecological or scientific significance. The tens of thousands of acres of roadless areas in these watersheds make an invaluable contribution to the pristine waters flowing out of the mountains of North Carolina, providing clean water for human use and contributing to habitat for aquatic species.

North Carolina relies on roadless areas, as well as other Forest Service lands, to serve as a buffer in protection of our watersheds. In addition to the special classifications noted above, many of the roadless areas fall within "water supply" watersheds, which provide clean drinking water to many North Carolinians. For example, the roadless areas of South Mills River and Laurel Mountain provide valuable water quality protection functions for Asheville and Hendersonville, two of the region's largest and fastest growing cities.

- ***Reducing hazardous fuels and restoring essential wildlife habitat***

Fuel reduction is generally accomplished using fire, biological methods, and mechanical treatments to remove or modify fuels in forested areas. Although most roadless areas have been logged in the past, the logging took place long enough ago that the forests are maturing or already mature. Consequently, they will continue to develop to old growth forests if left undisturbed. While almost any forest can burn if ignited under dry conditions, the roadless areas do not represent unduly hazardous fuel accumulations and thus do not typically require hazardous fuel reduction. While the lack of roads could make fighting wildfires more difficult in certain locations, the lack of roads would also reduce human-caused ignition by accident or arson, thus reducing the likelihood of fire in the first place.

By requesting that the provisions of the 2001 Rule be incorporated into North Carolina's petition as the particular management requirements for the state's inventoried roadless areas, we are providing for hazardous fuel reduction or restoration of essential wildlife habitat when necessary. The 2001 Rule addresses hazardous fuel concerns by allowing for timber cutting and removal in inventoried roadless areas "to maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects." Similar to the exception for timber cutting or removal to reduce wildfire risks, the 2001 Rule also allows timber cutting and removal when necessary to "improve threatened, endangered, proposed, or sensitive species habitat." These exceptions to the general prohibition on timber harvesting should provide the flexibility to address these issues on a case-by-case basis.

- ***Maintaining existing facilities and access to public and private property***

Under the management prescriptions of the 2001 Rule, which are included as the particular management requirements in this petition, no existing roads are closed. The provisions of the 2001 Rule also make clear that a road may be constructed if that "road is needed pursuant to reserved or outstanding rights, or as provided by statute or treaty."

- ***Technical corrections to existing maps such as boundary adjustments to remove existing roaded areas.***

There are no areas within North Carolina's current roadless inventory that have been altered by construction of a new road to the degree that they need to be removed from the roadless inventory.

(4) A description of how the recommended management requirements identified in paragraph (a)(2) of this section [section 2 of this petition] differ from existing applicable land management plan(s) or policies related to inventoried roadless area management and how they would comply with applicable laws and regulations.

North Carolina has nearly 174,000 acres of inventoried roadless areas, including over 153,000 acres in the Nantahala and Pisgah National Forests and approximately 20,000 acres in the Croatan National Forest. Information included in the 2001 Rule Final Environmental Impact

Statement and listed on the U.S. Forest Service Roadless Rule website (www.roadless.fs.fed.us) identifies a total of approximately 142,000 acres of inventoried roadless areas that are currently allocated to a prescription that allows road construction and reconstruction[1]. These same figures indicate that approximately 31,000 acres of inventoried roadless areas are allocated to a prescription that does not allow road construction and reconstruction.

North Carolina has been provided information from the U.S. Forest Service indicating that of the approximately 153,000 roadless area acres in the Nantahala and Pisgah Forests, a large majority of the acreage is not classified as suitable for timber production. In fact, only approximately 10,000 acres are classified as suitable for timber management. The state has also been informed by the U.S. Forest Service that there are currently no proposals for timber harvest or road construction in any inventoried roadless areas in North Carolina. However, current management prescriptions allow road construction and commercial logging in suitable areas and in commercially unsuitable areas based on other stated rationales, including salvage and logging for wildlife or visual quality. While these may be valid rationales for road building and logging in other areas of the forest, they threaten the integrity and conservation of inventoried roadless areas.

A primary motivation behind North Carolina's petition for full protection of inventoried roadless areas is our desire for certainty that this small amount of acreage will not be used for road construction and commercial logging. Because the forest management plans do not provide full protection for inventoried roadless areas, as described above, restoration of the certainty and clarity provided by the 2001 Rule is critical for the state and for its citizens. A proposed timber sale that included roadless areas was brought to the state's attention last year and serves as an example of the need for guaranteed protection for these areas. On June 9, 2005, the Pisgah National Forest (Grandfather Ranger District) proposed a timber sale that included significant logging within the Wilson Creek Roadless Area east of Linville, N.C. The June public notice did not disclose that the sale would occur in a roadless area (A copy of the June 9, 2005 scoping notice is attached to this petition). While the inclusion of these roadless areas in the proposed sale did not violate existing forest management plans, it did violate assurances provided to the state by the U.S. Forest Service that there was no near-term plan for logging or road construction in North Carolina's roadless areas. With the cooperation of U.S. Forest Service officials, a corrected notice was issued that removed all portions of the roadless area from the timber sale. While the Forest Service has indicated that the inclusion of roadless areas in this sale was in fact a mistake, this incident reinforces North Carolina's desire to secure clear and certain protection for all of its inventoried roadless areas.

(5) A description of how the recommended management requirements identified in paragraph (a)(2) of this section [section 2 of this petition] compare to existing State or local land conservation policies and direction set forth in any applicable State or local land and resource management plan(s).

[1] The amount of acreage open to road construction or reconstruction cited in the 2001 Rule Final Environmental Impact Statement has been reduced by approximately 1,400 acres due to recent changes in the Croatan National Forest Revised Land Resource and Management Plan.

In addition to providing maximum protection for the scarce resources and unique characteristics of our roadless areas, North Carolina's petition for full protection of these areas is consistent with our state laws and policies as described below.

Article XIV, Section 5 of the North Carolina Constitution reads:

> It shall be the policy of this State to conserve and protect its lands and waters for the benefit of all its citizenry, and to this end it shall be a proper function of the State of North Carolina and its political subdivisions to acquire and preserve park, recreational and scenic areas, to control and limit the pollution of our air and water, to control excessive noise, and in every other appropriate way to preserve as a part of the common heritage of this State its forests, wetlands, estuaries, beaches, historical sites, openlands, and places of beauty.

This explicit commitment to conserving and protecting our land and other natural resources for future generations is a theme found throughout our state statutes as well. The North Carolina Environmental Policy Act, Chapter 113A, Article I, includes a declaration of state environmental policy:

> The General Assembly of North Carolina, recognizing the profound influence of man's activity on the natural environment and desiring, in its role as trustee for future generations, to assure that an environment of high quality will be maintained for the health and well being of all, declares that it shall be the continuing policy of the State of North Carolina to conserve and protect its natural resources and to create and maintain conditions under which man and nature can exist in productive harmony. Further, it shall be the policy of the State to seek, for all of its citizens, safe, healthful, productive and aesthetically pleasing surroundings; to attain the widest range of beneficial uses of the environment without degradation, risk to health or safety; and to preserve the important historic and cultural elements of our common inheritance. (N.C.G.S. 113A-3).

The state's commitment to protecting our natural resources and making them accessible to our citizens is also reflected in the number of agencies responsible for these important tasks. These agencies include the North Carolina Wildlife Resources Commission and the Division of Forestry, the Division of Parks and Recreation, and the Natural Heritage Program within NC DENR.

The North Carolina Military Support Act of 2005 (S.L. 2005-445) provides one specific example of recent policymaking by the state aimed at protecting and preserving our natural areas. Consistent with our tradition of partnership with our state's military bases, this Act includes funding for buffering military bases and training areas through conservation acquisitions. The Onslow Bight Initiative and the Sustainable Sandhills Plan are intended to buffer Marine Corps installations at Camp Lejeune and Cherry Point, and Army installations at Fort Bragg, respectively, with conservation lands.

Finally, North Carolina has a strong interest in protecting both the quality and quantity of water within the state, as evidenced by our water quality programs and laws, and we understand that

this is integrally connected to responsible land use and management. N.C.G.S. 143, Article 21, directs that it is the intent of the state to maintain, protect and enhance the water quality of North Carolina. Over the last decade, North Carolina has made a strong commitment to the protection of open space and improvement of water quality through the Clean Water Management Trust Fund (Fund). Since the Fund was established in 1996, it has helped preserve nearly 300,000 acres of land and invested over $500 million in protection and acquisition projects. In 2005, the North Carolina General Assembly increased the appropriation to the Clean Water Management Trust Fund to $100 million for the current fiscal year.

N.C.G.S. 113A, Article 4, the Sedimentation and Pollution Control Act, identifies sedimentation of streams, lakes and rivers as a major pollution problem and draws a connection between policies related to land use and those related to water quality. Road construction and reconstruction in roadless areas is likely to lead to erosion, causing a decline in the water quality in these pristine areas, some of which serve as important sources of clean drinking water for mountain communities and essential aquatic habitat.

(6) A description of how the recommended management requirements identified in paragraph (a)(2) of this section [section 2 of this petition] would affect the fish and wildlife that utilize the particular lands in question and their habitat.

Most roadless areas in North Carolina are mature and maturing forests that are already inhabited by fish and wildlife species typically found in remote mature forests. Habitat for these species would remain at its current quality or would continue to improve as second-growth forests mature and waters continue to offer exceptional aquatic habitat. Although wildlife may be impacted to a slight degree by recreational users in these areas, these impacts are certainly much less than those of road construction and timber harvesting possible under current management prescriptions.

Habitat fragmentation and the conversion of natural landscapes to human use is a challenge our state continues to address in its efforts to protect and enhance wildlife habitat. Providing protections to roadless areas would support these efforts by keeping these habitats free from mechanical disturbance, barriers and sedimentation.

(7) A description of any public involvement efforts undertaken by the petitioner during development of the petition, including efforts to engage Tribal and local governments, and persons with expertise in fish and wildlife biology, fish and wildlife management, forest management, outdoor recreation, and other important disciplines.

Many North Carolinians have long supported full protection of our state's roadless areas. As noted previously in this petition, North Carolinians have submitted approximately 50,000 public comments to the U.S. Forest Service in support of full protection for roadless areas through the various comment periods since 1998. Public meetings in Asheville in 1999 and 2000 also evidenced broad support for the 2001 Rule, and citizen correspondence to government agencies continues to voice this same sentiment. In addition to the broad public support for protection of

roadless areas, implementation of the 2001 Rule in North Carolina has been highly successful. Roadless areas provide important environmental, economic, and cultural benefits, without compromising access to private lands and resources or impacting commercial timber harvesting.

Through the NC DENR and the Governor's Office, the state has consulted with relevant state agencies and other concerned parties through a number of meetings and phone conversations. While the nature of this process has varied depending on the parties involved and their level of knowledge and engagement on the roadless issue, consultations have typically included a discussion of the state's interest in a petition for full protection of inventoried roadless areas and a request for relevant information on a broad range of topics, including wildlife management, forest management, environmental protection and recreation opportunities. In several instance, the state has also provided information to concerned parties regarding the number and location of roadless areas, the level of protection provided by the 2001 Rule and current management plans, and the state petition process.

One of the earliest steps in our consideration of this petition was a meeting between staff of NC DENR and the Governor's Office and representatives of the U.S. Forest Service. This meeting provided the state with an opportunity to discuss current forest management plans, future plans for timber harvests and road construction, and the process for filing a state petition. At this time, the Forest Service also provided the state with detailed maps and inventories of roadless areas and their current management status.

Following our initial meeting with the Forest Service, the state has consulted with a number of state agencies, including the Division of Forestry and the Division of Parks and Recreation within NC DENR, the North Carolina Wildlife Resources Commission, the North Carolina Department of Agriculture and Consumer Services, and the North Carolina National Park, Parkway and Forests Development Council. Each of these agencies has a particular area of expertise related to roadless areas. For instance, the Department of Parks and Recreation administers North Carolina's State Parks and State Forests and works to preserve recreational opportunities and wildlife benefits in these areas. Similarly, the North Carolina National Park, Parkway and Forests Development Council (Council), is advisory body to NC DENR charged with studying the development of the Nantahala and Pisgah National Forests and recommending policies designed to develop the fullest use of these areas for recreational and scenic purposes. The Council is one of several groups the state consulted that has been actively engaged in the roadless issue, including submitting comments on the proposed 2004 Roadless Rule.

In addition to consultation with state agencies, we have also requested input from several local and tribal governmental entities. NC DENR consulted with the Eastern Band of Cherokee, the North Carolina League of Municipalities, and the North Carolina Association of County Commissioners. In addition, NC DENR provided information for the Association of County Commissioners to share with their members in western North Carolina whose jurisdictions include roadless areas.

To supplement our consultations with governmental agencies, North Carolina has also engaged a number of other organizations, including those representing the forest products industry and those concerned with outdoor recreation, environmental protection, and forest and wildlife

preservation. Among the groups consulted are the North Carolina Forestry Association, the North Carolina Chapter of the Sierra Club, the North Carolina Wildlife Federation, and the Appalachian Trail Conservancy. Through these consultations, the state has obtained information on several important issues, including the impact of restoring full protection for roadless areas on the state's timber industry, the benefits of roadless areas as wildlife habitat, the unique recreational opportunities available in roadless areas, the importance of these areas to North Carolina's travel and tourism industries, and the presence of rare flora and fauna in roadless areas.

The process of consultation with many concerned parties, coupled with the strong public support for protecting roadless areas and the successful implementation of the 2001 Rule, has informed the development of North Carolina's petition and our request for protection of roadless areas in accordance with the 2001 Rule. Upon acceptance of this petition, the state is also prepared to be a full participant in further stakeholder processes through the State-specific rulemaking.

(8) A commitment by the petitioner to participate as a cooperating agency in any environmental analysis for a rulemaking process.

North Carolina is committed to participate as a cooperating agency in the environmental analysis for a state specific rulemaking that would provide protections under the 2001 Rule for all of the inventoried roadless areas in North Carolina.

Submitted this 9th day of March 2006,

Michael F. Easley

Appendix I

Inventoried Roadless Areas in North Carolina

	Acres	Total Acres
Croatan National Forest[1]		
Catfish Lake North	11,294	
Catfish Lake South Addition A	172	
Catfish Lake South Addition B	233	
Sheep Ridge Addition	5,806	
Pond Pine Addition B	2,980	
Pocosin Addition	286	20,771
Nantahala National Forest[2]		
Barkers Creek (Add.)	976	
Big Indian (Add.)	1,154	
Boteler Peak	4,220	
Cheoah Bald	7,808	
Cherry Cove (Add.)	844	
Chunky Gal (Add.)	3,475	
Deep Creek/Avery Creek (Add.)	1,896	
Little Indian (Add.)	647	
Overflow	3,378	
Sharptop Ridge (Add.)	594	
Snowbird	8,501	
Tusquitee Bald	13,788	
Wesser Bald	4,093	
Yellowhammer Branch (Add.)	1,271	52,645
Pisgah National Forest[3]		
Bald Mountain	11,244	
Balsam Cone	11,290	
Bearwallow	4,116	
Craggy Mountain	2,658	
Dobson Knob	6,127	
Graveyard Ridge	1,973	
Harper Creek	7,351	
Jarrett Creek	7,500	
Laurel Mountain	5,682	
Linville Gorge (Add.)	2,800	
Lost Cove	5,954	
Mackey Mountain	5,932	
Middle Prong (Add.)	1,852	
Sam Knob (Add.)	2,583	
Slide Hollow	193	
South Mills River	8,627	
Wilson Creek	4,989	
Woods Mountain	9,603	100,474

Uwharrie National Forest	0	0
Total Inventoried Roadless Areas in North Carolina		**173,890**

[1] From Croatan Revised Plan FEIS
[2] USFS Summary of NC Inventoried Roadless Areas 5/25/05, letter from USFS to NC DENR
[3] USFS Summary of NC Inventoried Roadless Areas 5/25/05, letter from USFS to NC DENR

Appendix II

List of Attachments to Petition

- Letter from Governor Easley to Secretary Veneman (August 16, 2004)
- Maps of Croatan and Nantahala/Pisgah from 2000 Final Environmental Impact Statement
- U.S. Forest Service Map of Nantahala/Pisgah (May 2005) [not included in this copy]
- Description of Croatan roadless areas from the Final Environmental Impact Statement for the Revised Croatan Land and Resource Management Plan (December 2002)
- Scoping notice from proposed timber sale in Grandfather Ranger District (June 2005)
- Revised scoping notice from proposed timber sale in Grandfather Ranger District (November 2005)

STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR
20301 MAIL SERVICE CENTER
RALEIGH, NC 27699-0301

MICHAEL F. EASLEY
GOVERNOR

August 16, 2004

The Honorable Ann Veneman
Secretary of Agriculture
14th Street and Independence Avenue, SW
Washington, D.C. 20250

Dear Madam Secretary:

I am writing to express serious concerns with regard to the U.S. Department of Agriculture's proposal to replace the existing Roadless Area Conservation Rule with a state petitioning process for inventoried roadless area management. As published in the *Federal Register* on July 16, 2004, this new rule would impose a vague new bureaucratic process on the management of North Carolina's 1.23 million acres of National Forest land without providing commensurate benefits.

The proposed rule, for example, provides insufficient clarity on how the U.S. Department of Agriculture (USDA) would respond to a state's petition. The rule provides for a review of the petition and a decision by the Secretary within 180 days, but there is no indication of the criteria that are to be considered in this process. In the event that a state petition is accepted, the proposed rule calls for the U.S. Forest Service to initiate a subsequent rulemaking for the inventoried roadless areas within that state. Here, again, the state's role is unclear. The proposal indicates that state-specific rules will be coordinated with the individual states but provides no details on the scope of this coordination and no information on how quickly the rulemaking process will be completed.

The rule also fails to specify how the USDA would address the management of a roadless area that lies in more than one state. For example, the Bald Mountain Roadless Area with over 20,000 acres spans the border between North Carolina and Tennessee. The proposal's state-specific rulemaking could result in inconsistent management plans due to conflicting state priorities. Actions on one side of the border will undoubtedly impact and could potentially undermine management strategies on the other side.

Finally, the petitioning process outlined in the proposed rule has the potential to be quite onerous to state agencies that are already dealing with limited resources. The notice of proposed rulemaking estimates that preparation of a petition will require as much as 1,000 hours of state staff time. I cannot see the justification for requiring that kind of investment in bureaucratic analysis when those resources could be used to enhance and protect our state's forests. This is especially true in light of the fact that the current management policy under the Roadless Area Conservation Rule already in place is working well.

In sum, I am concerned that the proposed rule is unclear and has the potential to place an undue burden on our state agencies without providing any benefit to North Carolina's forest resources.

Thank you for the opportunity to comment and for your consideration of these comments in the development of the final rule.

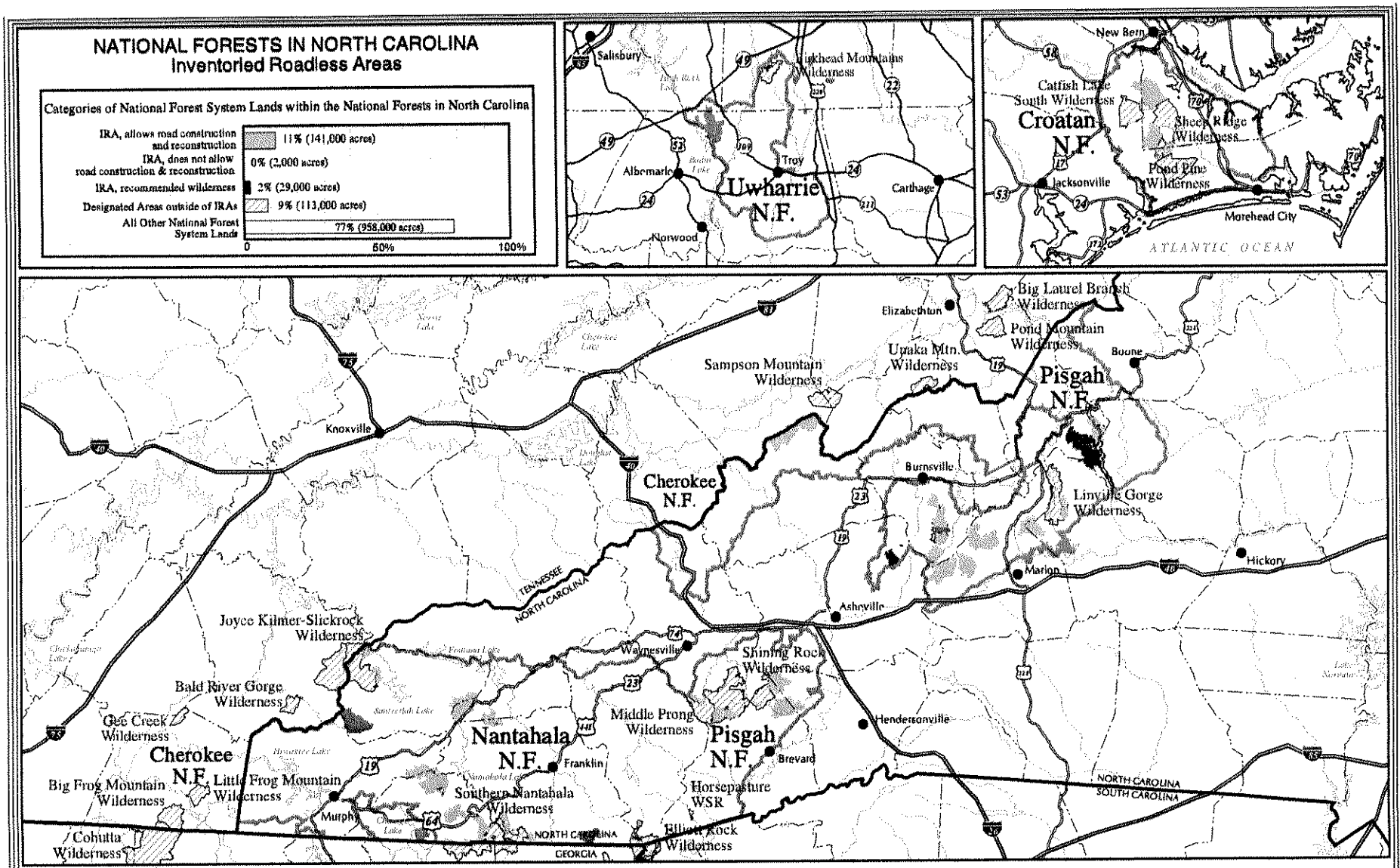
With kindest regards, I remain

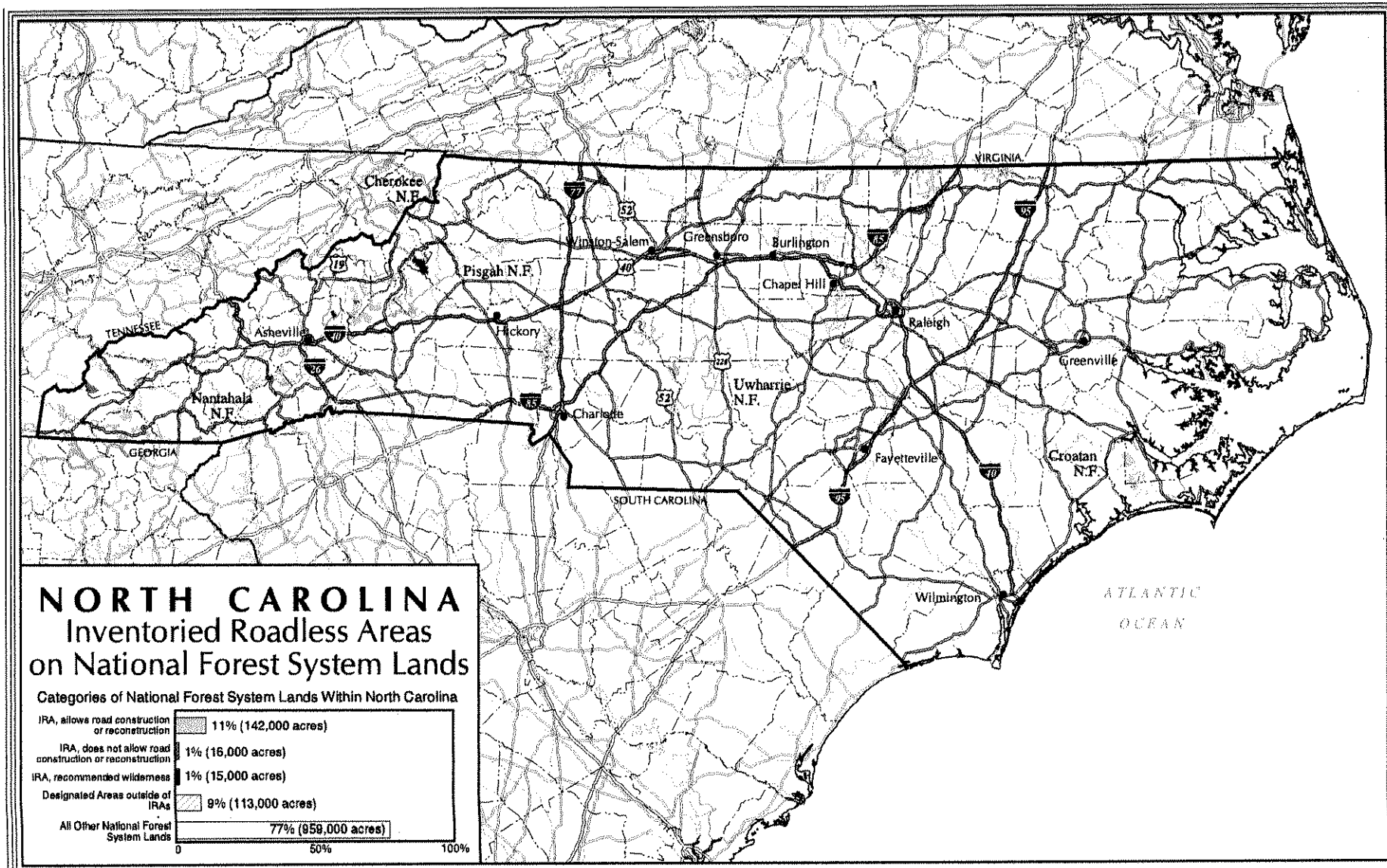
Very truly yours,

Michael F. Easley

MFE: sw

cc: Content Analysis Team, USDA Forest Service


NATIONAL FORESTS IN NORTH CAROLINA
Inventoried Roadless Areas
Categories of National Forest System Lands within the National Forests in North Carolina
IRA, allows road construction and reconstruction
11% (141,000 acres)
IRA, does not allow road construction & reconstruction
0% (2,000 acres)
IRA, recommended wilderness
2% (29,000 acres)
Designated Areas outside of IRAs
9% (113,000 acres)
All Other National Forest System Lands
77% (958,000 acres)
0
50%
100%
Salisbury
Albemarle
Troy
Uwharrie N.F.
Carthage
Norwood
Linkhead Mountains Wilderness
New Bern
Catfish Lake South Wilderness
Croatan N.F.
Jacksonville
Sheep Ridge Wilderness
Pond Pine Wilderness
Morehead City
ATLANTIC OCEAN
Elizabethton
Big Laurel Branch Wilderness
Pond Mountain Wilderness
Boone
Unaka Mtn. Wilderness
Sampson Mountain Wilderness
Pisgah N.F.
Knoxville
Burnsville
Cherokee N.F.
Linville Gorge Wilderness
Marion
Hickory
Asheville
TENNESSEE
NORTH CAROLINA
Joyce Kilmer-Slickrock Wilderness
Waynesville
Shining Rock Wilderness
Bald River Gorge Wilderness
Gee Creek Wilderness
Middle Prong Wilderness
Hendersonville
Nantahala N.F.
Pisgah N.F.
Franklin
Brevard
Cherokee N.F.
Big Frog Mountain Wilderness
Little Frog Mountain Wilderness
Southern Nantahala Wilderness
Horsepasture WSR
Murphy
NORTH CAROLINA
SOUTH CAROLINA
Cohutta Wilderness
NORTH CAROLINA
GEORGIA
Ellicott Rock Wilderness
The USDA Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. Using GIS products for purposes other than those for which they were intended may yield inaccurate or misleading results. The USDA Forest Service reserves the right to correct, update, modify, or replace GIS products without notification.
SCALE in MILES
20
0
20 Miles
September 15, 2000
Data Supplied by National Forests in North Carolina
Contact: National Forests in North Carolina
160A Zillicoa Street
PO Box 2750
Asheville, NC 28802
(828) 257-4200
Inventoried Roadless Area where road construction or reconstruction is allowed
Inventoried Roadless Area where road construction or reconstruction is not allowed
Inventoried Roadless Area where road construction or reconstruction is not allowed, and the forest plan recommends as wilderness
Designated Areas outside of Inventoried Roadless Areas
National Forest System lands outside of Inventoried Roadless Areas - not all private land is shown on the map
Interstate Highway
Other Highways
County boundaries



NORTH CAROLINA
Inventoried Roadless Areas on National Forest System Lands

Categories of National Forest System Lands Within North Carolina

The USDA Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. Using GIS products for purposes other than those for which they were intended may yield inaccurate or misleading results. The USDA Forest Service reserves the right to correct, update, modify, or replace GIS products without notification.

40 0 40 Miles

September 15, 2000
Data Supplied by individual National Forests
Contact the National Forest Offices for further information.

Lambert Conformal Conic Projection

- Inventoried Roadless Area where road construction or reconstruction is allowed
- Inventoried Roadless Area where road construction or reconstruction is not allowed
- Inventoried Roadless Area where road construction or reconstruction is not allowed, and the forest plan recommends as wilderness
- Designated Areas outside of Inventoried Roadless Areas
- National Forest System lands outside of Inventoried Roadless Areas - not all private land is shown on the map

- Interstate Highway
- Other Highways
- County boundaries

FEIS Appendix C: Evaluation Of Roadless Areas On The Croatan National Forest

C.1. Purpose For Study

The Croatan National Forest has six inventoried roadless areas totaling 20,771 acres. Although referred to as roadless areas, some of them contain roads as permitted in FSH 1909.12, "Land and Resource Management Planning Handbook."

The roadless areas were evaluated for their potential wilderness suitability, using a report format in accord with CFR 219.17. These reports consider wilderness suitability in three categories: capability (the qualities that make an area suitable or unsuitable for wilderness), availability (assessing the wilderness and nonwilderness resources and local demands on the area), and need (existence of other wilderness in the area and trends in use). All six roadless areas are reported together in this evaluation due to their close proximity and similar characteristics.

Two tracts, Masontown Pocosin and Union Point Pocosin, were evaluated and excluded from the roadless inventory for not satisfying the criteria of solitude because of their proximity to Cherry Point Marine Air Corps Station and the incoming and outgoing flights.

The following is a list of the roadless areas that were studied, their numbers, names and acreages:

11301	Catfish Lake North	11,294 acres
11302	Catfish Lake South Addition A	172 acres
11303	Catfish Lake South Addition B	233 acres
11304	Sheep Ridge Addition	5,806 acres
11306	Pond Pine Addition B	2,980 acres
11307	Pocosin Addition	286 acres

C.2. Description

Location and vicinity:
The roadless areas are within 17 miles of each other and have partial boundaries to existing Wildernesses.

- Catfish Lake North has the Catfish Lake Impoundment as a western boundary, and two roads (Catfish Lake Road & Catfish Lake Farm Road) on the south. Little Road is the eastern boundary, with national forest boundary on the north.
- Catfish Lake South Additions A&B are land acquisitions since the designation of Catfish Lake South Wilderness, and protrude into the wilderness off Catfish Lake Road.
- Sheep Ridge Addition has roads surrounding it including OHV trails on the west, Seaborn Road 174 on the south, Lake Road 126 (and Pond Pine Wilderness) on the east, and Great Lake and Road 513 on the north.
- Pond Pine Addition B is adjacent Pond Pine Wilderness on the west, Great Lake on the north, national forest boundary on the east and the U.S. Marine Corps railroad on the south.

- Pocosin Addition is a boundary adjustment on the southeast side of Pocosin Wilderness bounded by Mairey Branch and Juniper Branch.

General Geographic Description Of The Area:
The areas are mostly coastal plain pocosins. Topography is nearly level, indicative of coastal wetland systems. The east edge of Catfish Lake North, Catfish Lake South Additions A & B, and part of Pond Pine Addition B are swamp forest areas.

General Description Of The Area Vegetation, Including The Ecosystem Types:
Pocosins are defined as "freshwater wetland ecosystems characterized by broadleaved evergreen shrubs or low-growing trees, commonly including pond pine, and commonly growing on highly organic soils that have developed in areas of poor drainage" (Sharitz and Gibbons, 1982). These areas include a mix of low and high pocosin. Low pocosins are dominated by low-growing shrubs, typically 2-3 feet high. High pocosin includes taller shrubs and trees. Pocosin vegetation is typically dense, almost impenetrable.

Pocosins are biologically rich and diverse with plants. Dominant trees are ordinarily pond pines with some loblolly bays, red bays, and sweet bays. The most frequent shrubs are titi, honeycup, fetterbush, bitter gallberry, and sweet gallberry growing with the bamboo-briar vine (McDonald, Ash, and Kane 1983). The presence of abundant and diverse insectivorous plants is a unique feature of pocosin vegetation.

Key Attractions, Including Sensitive Wildlife And Scenic Landmarks:
There are no special attractions in the areas that are not found in other places on the forest. The areas are all part of black bear habitat and some are part of the bear sanctuary. A segment of West Prong Creek runs through Catfish Lake North. This segment is eligible for wild & scenic river designation. There are existing and proposed Special Interest Areas (SIA)through cooperation with the NC Natural Heritage Program. These include: Catfish Lake North, a proposed area in the western part; Sheep Ridge Addition, an existing SIA in the north half; Pond Pine Addition B, existing and proposed SIA's covering all of the area; Pocosin Addition, an existing SIA covering the whole area. Catfish Lake North has existing RCW colonies along Little Road, and a recruitment area off the north end of the Waterfowl Impoundment.

C.3. INVENTORY

Human Influence

To what degree have humans and past and present human activity affected natural ecological processes and conditions?

The natural ecological processes for the areas are largely intact, with the exception of the need for fire in these systems. There has been logging in some areas as recently as 1990. Two of the areas, Catfish Lake North and Sheep Ridge Addition have had prescribed fire in the past. Catfish Lake South Addition A has RCW colonies and artificial nesting cavities.

To what degree is the area natural or natural appearing and free from disturbance?

All of the areas have had some level of disturbance, with most of it from road systems and activities associated with the roads surrounding the areas. Catfish Lake North has timber harvest units along Little Road and Catfish Lake Road with plantations as young as 10 yrs. There are also many fire lines in the eastern third of the area. Catfish Lake South Addition A is undisturbed except for an older harvest unit along the eastern edge. Catfish Lake South Addition B is undisturbed. Sheep Ridge Addition has older timber harvest units along the southern edge, wildlife fields on the east boundary, and extensive plow lines in the northern half. These were created in the 1994 Fish Day Fire when the entire area burned. Pond Pine Addition B is relatively undisturbed with an old fire line in the SE corner. Pocosin Addition has an old harvest unit in the northern half.

Does the existing or attainable National Forest System ownership pattern, both surface and subsurface, ensure perpetuation of identified wilderness values?

The surface and subsurface are in Forest Service ownership.

Improvements, Structures, and Nonconforming Uses
There are no areas with evidence of historic mining and there are no areas under current mineral lease that contain a "no surface occupancy" stipulation or where the lessee has not exercised development and occupancy rights.

Catfish Lake North has dispersed hunting camps along Catfish Lake Farm Road and an OHV trail extending into the area one mile. There are no other trails within any of the areas. There are no private inholdings or dwellings, non-conforming structures, utilities or watershed treatment areas. Three areas have improved road miles within them: They are Catfish Lake North (0.8 miles), Sheep Ridge Addition (1.3 miles), and Pocosin Addition (0.15 miles). Existing nonconforming uses can be mitigated or terminated through closing interior roads and OHV trails.

C.4. EVALUATION

Capability Experiential Benefits.

Do the areas provide the opportunity for solitude and serenity?

There are many opportunities for solitude and serenity in the areas. Factors detracting from solitude and serenity are military overflights, roads that bound most of the areas, the military railroad along Pond Pine Addition B, and the presence of motorboats on Catfish Lake and Great Lake.

Challenge.

Do the areas offer visitors the opportunity to experience adventure, challenge, or self-reliance? Is access easy or difficult?

Access is by system roads which bound most of the areas. Opportunities to experience adventure are similar to those for other relatively small undisturbed areas of the southeastern U.S. There are no trails within any of these areas. Access within the areas is by cross-country travel through dense vegetation

on boggy soils. Traversing a pocosin requires a high level of orienteering skills and provides the wilderness visitor many opportunities to experience solitude, challenge and self-reliance.

Recreation opportunities include primitive camping along the boundaries, hunting with dogs within the areas, fishing and boating in Catfish and Great Lakes, cross-country hiking or horseback riding, photography and nature study.

Opportunities exist to do outdoor education and scientific study of the pocosin ecosystem and wildlife, formally and informally in these areas.

What are the characteristics of the surrounding areas in terms of recreation opportunity spectrum (ROS) classifications?

The acres of semi-primitive non-motorized and semi-primitive motorized acres are as follows:

Table C-1. Acres of semi-primitive motorized and non-motorized settings for roadless areas.

AREA	SPNM Acres	SPM Acres
Catfish Lake North	6,779	0
Catfish Lake South Addition A	0	0
Catfish Lake South Addition B	0	0
Sheep Ridge Addition	2,429	459
Pond Pine Addition B	0	727
Pocosin Addition	150	0

The areas surrounding the roadless areas, other than Wildernesses are all roaded natural, except for the railroad along Pond Pine Addition B, and Catfish Lake South Additions A&B, which are within the 1/4 mile rural designation.

Do boundary locations conflict with important existing or potential public uses outside the boundary that might result in demands to allow nonconforming structures and/or activities in the wilderness?

There are no conflicts with potential public uses outside the areas, except for the military railroad along Pond Pine Addition B. The ability to do maintenance of the track and to fight fires that are often started along the railroad, would be hampered by restricted access and the prohibition on motorized equipment use in the wilderness.

The boundaries can be accurately described and established on the ground, conform with terrain or vegetation that constitute a barrier to prohibited use, and act as a shield to protect the wilderness environment inside the boundary from the sights and sounds of civilization.

Availability

What current uses exist? What are the non-wilderness demands and uses?

Recreation: Hunting, boating and fishing on Catfish & Great Lakes. The soils in the pocosin areas prohibit any kind of recreational development because of their unstable, saturated condition. Even primitive trails are difficult to maintain. The areas do not contain natural phenomena of such unique or outstanding nature that general public access and special development should be available. Because of

this and the condition of the soils, the recreation component is not a major factor in wilderness designation.

Wildlife: All the areas are habitat for black bear, and Sheep Ridge Addition and Pond Pine Addition B are currently in the bear sanctuary. There are RCW habitat management areas on the east boundary and along the Catfish Lake Waterfowl Impoundment adjacent Catfish Lake North. Only burning to retain the habitat would be allowed if the area were wilderness. Wilderness designation would not restrict or prevent the application of wildlife management measures.

Timber: The areas are tentatively suitable for timber production except for Pocosin Addition and fall in the 71 - 100 year age class. These lands are not needed to meet the timber resource demands.

Urban interface: Catfish Lake North has a fire urban interface zone along the national forest boundary on the north. If the area is designated wilderness it will be difficult to maintain that zone through burning because of the difficulty in maintaining firelines within the wilderness.

Heritage Resources: There have been surveys done in Catfish Lake North, and along Catfish Lake Road. Total acres surveyed was low and no Class II sites were found.

Need

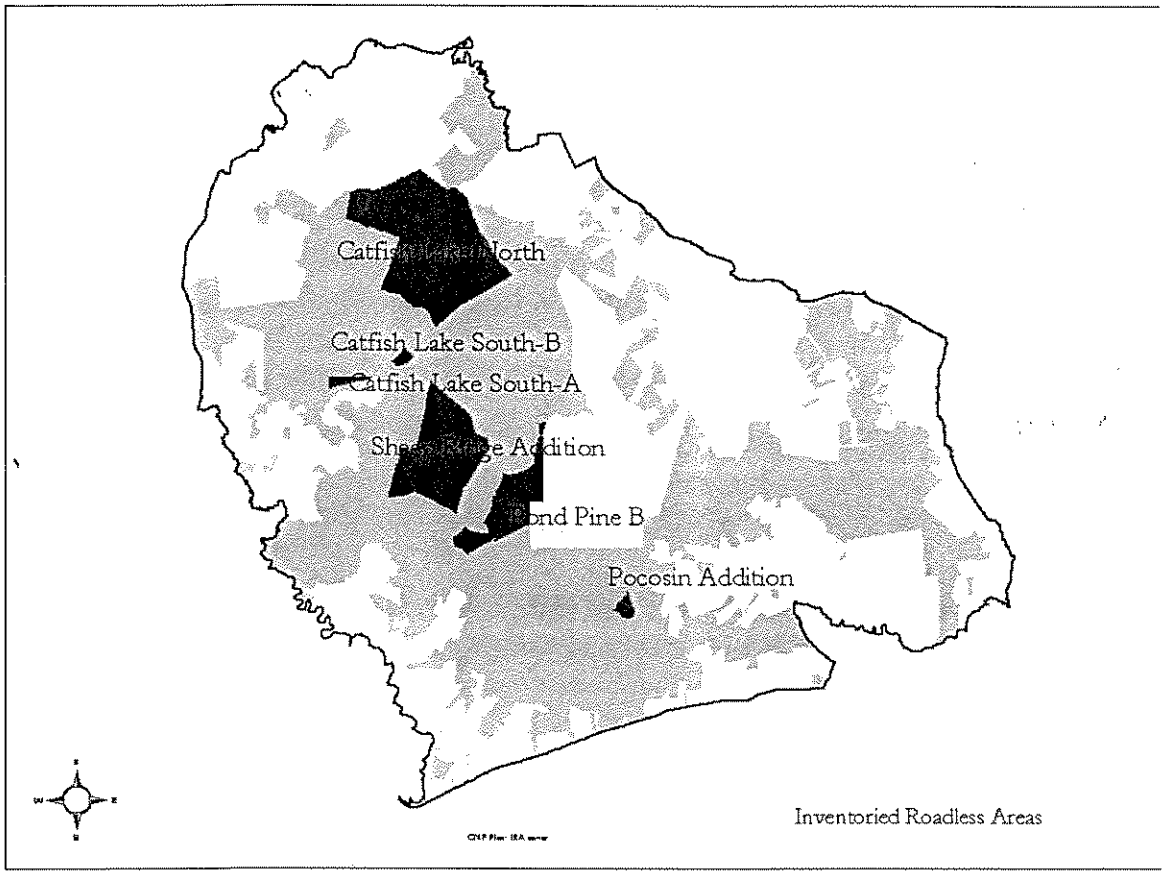
These roadless areas are adjacent to the four existing Wildernesses (31,221 acres), although some of them are separated by roads or a railroad. The existing Wildernesses receive approximately 2600 visitors each year. The three county region of the forest is growing much faster than the State of North Carolina and the national average. Hunting, which occurs in part in the Wildernesses, is the largest single recreational use of the forest. Although hunting is increasing, other uses of wilderness are experiencing no upward trend. Therefore, the need for wilderness to meet the need for semi-primitive recreational experiences is not necessary. In addition, the two roadless areas that were considered, but excluded from wilderness consideration are available for a vehicle-restricted and primitive recreational experience.

It is important to provide sanctuary for the black bear whose habitat requires low road density. As development continues on land surrounding the National Forest, it will become more important to provide large unroaded settings. Existing Wildernesses and roadless areas have the same ecological landtypes. Therefore, none of the roadless areas offer unique ecological attributes that would become the basis for wilderness designation.

The allocations of roadless areas to management prescriptions are shown in Table C-2. Due to the desired conditions of the management prescriptions, the characteristic of 'roadless' is not likely to be significantly affected in any alternative.

Table C-2. Management prescription allocations by roadless area by alternative

Catfish Lake North	Alternatives				
	B	C	C-mod	D	E
Prescriptions					
Wilderness	11294				
Hardwood Cypress Wetlands		61	61	801	61
River Corridors Eligible for Wild and Scenic River Status		740	740		740
RCW HMA		1077	1077	1077	1077
Wildland Urban Interface		1401	1401	1401	1401
Bear		7789	7789	7789	7789
Developed Areas		2	2	2	2
Small Pocosin Patches		224	224	224	224
Catfish Lake South B					
Wilderness	233	233	233	233	233
Catfish Lake South A					
Wilderness	172	172	172	172	172
Pocosin Addition					
Wilderness	286	286	286	286	286
Sheep Ridge Addition					
Wilderness	5716	0	0	0	0
RCW	77	77	77	77	77
Bear	0	5716	5716	5716	5716
Developed	3	3	3	3	3
Small pocosin	10	10	10	10	10
Pond Pine B					
Wilderness	2980		2980		
wetlands		587		587	587
Lakes		3		3	3
RCW		273		273	273
Bear		2076		2076	2076
Small pocosin		41		41	41


Catfish Lake North
Catfish Lake South-B
Catfish Lake South-A
Pocosin Addition
Inventoried Roadless Areas

United States Department of Agriculture | Forest Service | Grandfather Ranger District | 109 East Lawing Drive
I-40 Exit 90 (Nebo-Lake James)
Nebo NC 28761-9707

File Code: 1950

Date: June 9, 2005

Dear Interested Reader:

Enclosed is a preliminary working map and list of proposed actions for the Grandfather Ranger District's Old House Gap Project which is located in Avery and Caldwell Counties, North Carolina. This project was developed to address management opportunities identified for timber, wildlife, soils, and water resources within the 8,479-acre Upper Wilson Creek analysis area (AA) and the 7,033-acre Anthony Creek AA, and specifically within compartments 50, 51, 69, 70, 77, and 78. The purpose of this letter is to inform you of this proposal and to solicit comments from you concerning it. The proposal is about 13 miles northwest of Lenoir, North Carolina.

Management opportunities were identified through a comparison of existing and desired conditions which could move this landscape toward a desired future condition. The desired future condition for a given resource was determined by examination of the Forest-wide and Management Areas (MA) 3B and 4A General Direction and Standards in the Land and Resource Management Plan, Amendment 5, for the Nantahala and Pisgah National Forests (USDA March 1994 and here after referred to as Forest Plan). The general objective for MA 3B is to emphasize a sustainable supply of timber with few open roads and to provide for the habitat needs of wildlife such as wild turkey and deer (Forest Plan, page III-71). The general direction for MA 4A is to permit timber production that is modified to emphasize visual quality and wildlife habitat (Forest Plan, page III-77). No ground disturbing activities are proposed within the approximately 2,000-acre Wilson Creek Wild and Scenic River (WSR) corridor which is in the AAs (Forest Plan, pages III-11 and III-14). The proposal would designate old growth and reduce invasive exotic species within the WSR which is consistent with the Wilson Creek WSR Comprehensive River Management Plan expected to be finalized this summer. Forest Service Roads 192, 451, and 4062 were recently damaged by the effects of the September 2004 tropical storms and will be repaired under separate analyses.

The purpose and need (objectives) for the proposal is to meet Forest Plan direction by:

1. Providing habitat conditions for species such as eastern wild turkey, ruffed grouse, white-tailed deer, and travel corridors and foraging habitat for black bear across the project area by dispersing early successional habitat across the landscape by regulating the amount of 0-10 year age class in MA 3B (Forest Plan, page III-31). Forest Plan direction will be met in MA 4A by providing habitat conditions for species such as black bear, eastern wild turkey, pileated woodpecker, golden-crowned kinglet, saw-whet owl, bats, white-breasted nuthatch, and gray squirrel by creating dispersed 0-10 year age class (Forest Plan, page III-31). Forest Plan standards for 0-10 year age class distribution in MA 3B is 5 – 15%, and 0 – 10% for MA 4A (Forest Plan, page III-31).

   Currently, the 0-10 year age class is 0% in the project area and the Upper Wilson Creek watershed, while there is less than 1% of the 0-10 year age class in the Anthony Creek watershed. Desired wildlife habitat would also be provided by creating permanent grass and forb openings for species such as eastern wild turkey; desired amount is 3% (Forest Plan, pages III-74 and III-84). Currently, there is 0.3% permanent grass and forb habitat within the AAs. Provide a 30-foot feathered edge of 0-10 year age class surrounding

existing grass/forb openings to improve the species diversity and utilization of the grass/forb habitat.

2. Creating a network of small, medium, and large sized old growth areas across the landscape to serve as permanent reservoirs of biological diversity (Forest Plan, pages III-26 and III-27). In each compartment containing more than 250 acres, 5% of the compartment acres or 50 acres, whichever is greater, must be selected as a contiguous small patch prior to the first ground disturbing activity of 5 acres or more in the compartment (Forest Plan, page III-27). In each administrative watershed containing more than 2,500 acres, 5% of the watershed acres must be selected as a contiguous medium patch prior to the first ground disturbing activity of 5 acres or more in the compartment (Forest Plan, page III-27). Large patches identified in Appendix K of the Forest Plan must be evaluated and 2,500 contiguous acres or more must be selected in or near the large patches identified in the Forest Plan prior to the first ground disturbing activity of 5 acres or more in the watershed where one of the large patches occur (Forest Plan, page III-26). Areas designated as an old growth patch may satisfy other patch requirements thereby negating the need for additional designation of old growth; e.g. 5% of watershed acreage in a designated large patch of old growth satisfies the medium patch requirement for the watershed (Forest Plan, page III-27).

   Currently, compartments 50 and 51 contain small patches of designated old growth, while compartments 69, 70, 77, and 78 do not contain designated small patches of old growth. The Anthony Creek watershed contains a portion of the designated Large Patch 24 which satisfies the medium patch requirement for this watershed, however; a medium patch must be designated in the Upper Wilson Creek watershed. Large Patch 24 is the only large patch that is within the analysis area of the project and has been evaluated and designated as an old growth large patch.

3. Using prescribed fire to create and maintain desired wildlife habitat and reduce fire hazards (Forest Plan, page III-52). Understory burning can reduce the basal area of midstory and understory woody species to create a more open habitat; increase available browse by top-killing small hardwood stems and causing sprouting to occur and increasing legumes and herbaceous plants; maximize local habitat diversity and edge-effect by having some unburned patches throughout the area; and reduce the risk of damaging wildfire by reducing fuel accumulations on the forest floor.

4. Using herbicides to control/manage pest populations (Forest Plan III-52). Currently, the invasive species royal paulownia, oriental bittersweet, multiflora rose, Japanese honeysuckle, and Japanese barberry are invading the Forest via the road system. Apply an Imazapic application to grass/forb openings which are currently dense fescue and re-seed into a clover/warm season grass coverage.

I recognize you may have interest and concerns with this proposal and this is why I am requesting your comments concerning it. Your specific comments to the proposal will help me identify key issues and possible alternative ways of meeting the project's purpose and need. ***Please return your comments to me by July 11, 2005.***

Feel free to contact Greg Van Orsow Project Leader, David Casey, Co-Project Leader, or me at 828-652-2144; or Michael Hutchins, Interdisciplinary Team Leader, at 828-682-6146, if you have questions or need additional information regarding this proposal. Comments may be mailed to: Grandfather Ranger District, ATTN. District Ranger, 109 East Lawing Drive, Nebo, North Carolina 28761 or emailed to: comments-southern-north-carolina-pisgah-grandfather@fs.fed.us. I appreciate your continued interest in management of the Pisgah National Forest.

Sincerely,

MIERA B. CRAWFORD
District Ranger

Enclosures

Old House Gap Project Proposal:

1. Regenerate a total of approximately 228 acres within the 15,512-acre Analysis Areas, using the two-age regeneration harvest method and retain 15-20 square feet of basal area per acre (225 acres), and thin white pine (3 acres). Harvest would occur in two MAs;
   a. MA 3B – Timber Emphasis, Limited Motorized Access (40 acres) in Compartment-Stand 50-13[1], 51-06[1], and 51-24;
   b. MA 3B – Harvest approximately 3 acres of white pine only in 51-18. Seed clover under the predominantly oak, residual overstory; and
   c. MA 4A – Visually Pleasing Scenery (185 acres) in 69-07, 69-09, 70-14, 77-01[1], 77-03[1], 77-10[1], 78-05[1], 78-10[1], and 78-14.

2. Use and maintain the existing road system.

3. Develop approximately 2.25 miles of temporary road to access stands 69-09, 70-14, 77-01, 77-10, 78-05, and 78-14.

4. Following harvest activites, expand the log landing in stand 69-09 to two acres and maintain as a wildlife field.

5. Following harvest activities, disc and seed with a native mix all unsurfaced temporary roads, skid roads, and log landings created during harvest.

6. Site prepare and subsequent release, if needed, in all stands being regenerated using herbicides and manual methods.

7. Use herbicides to control less than 50 acres of invasive exotic plants along Forest Service Roads, around a wildlife field, and within the Wilson Creek WSR corridor.

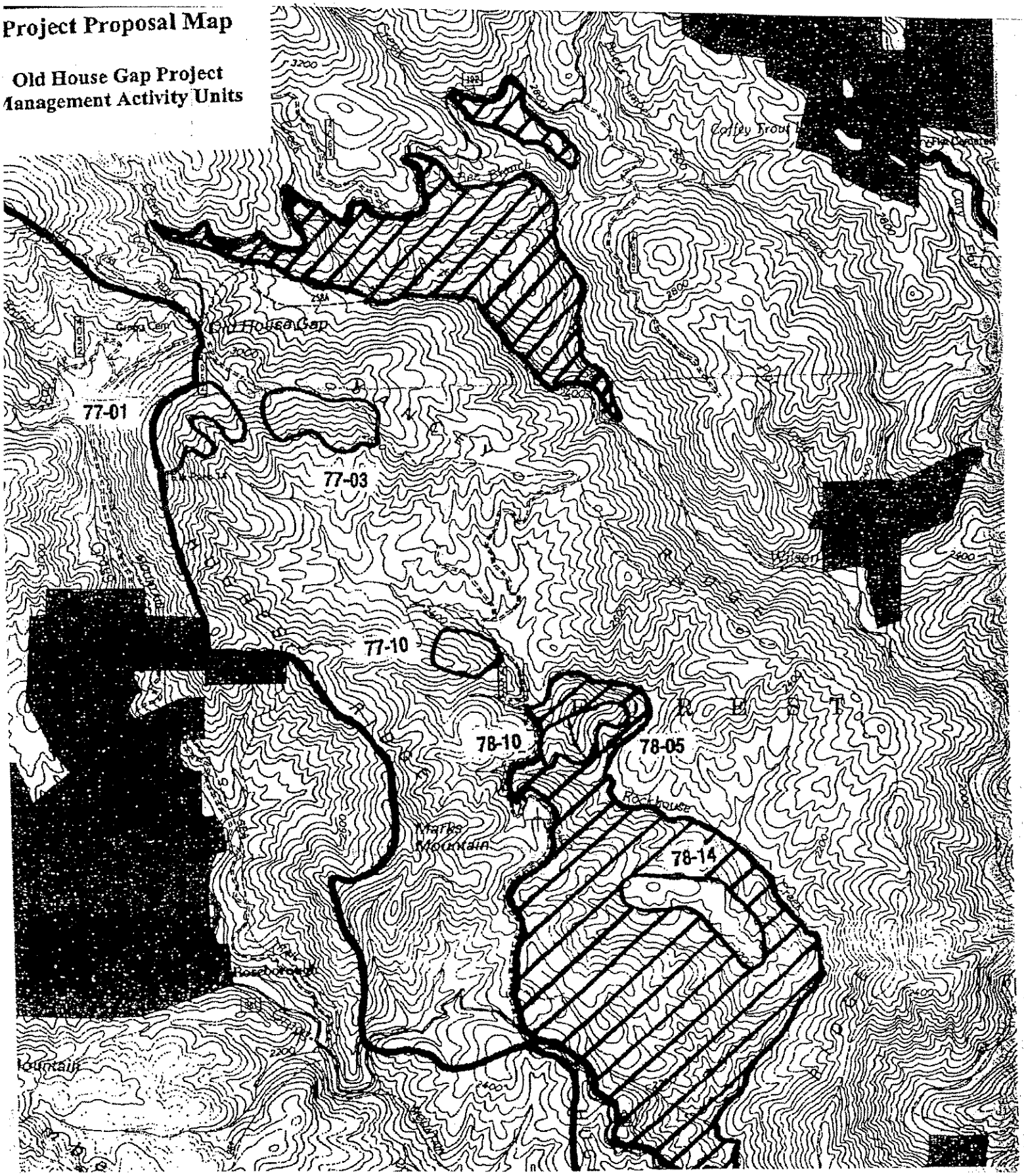
8. Prescribe burn approximately 770 acres within compartments 71, 73, 74, 75, 78, and 79.

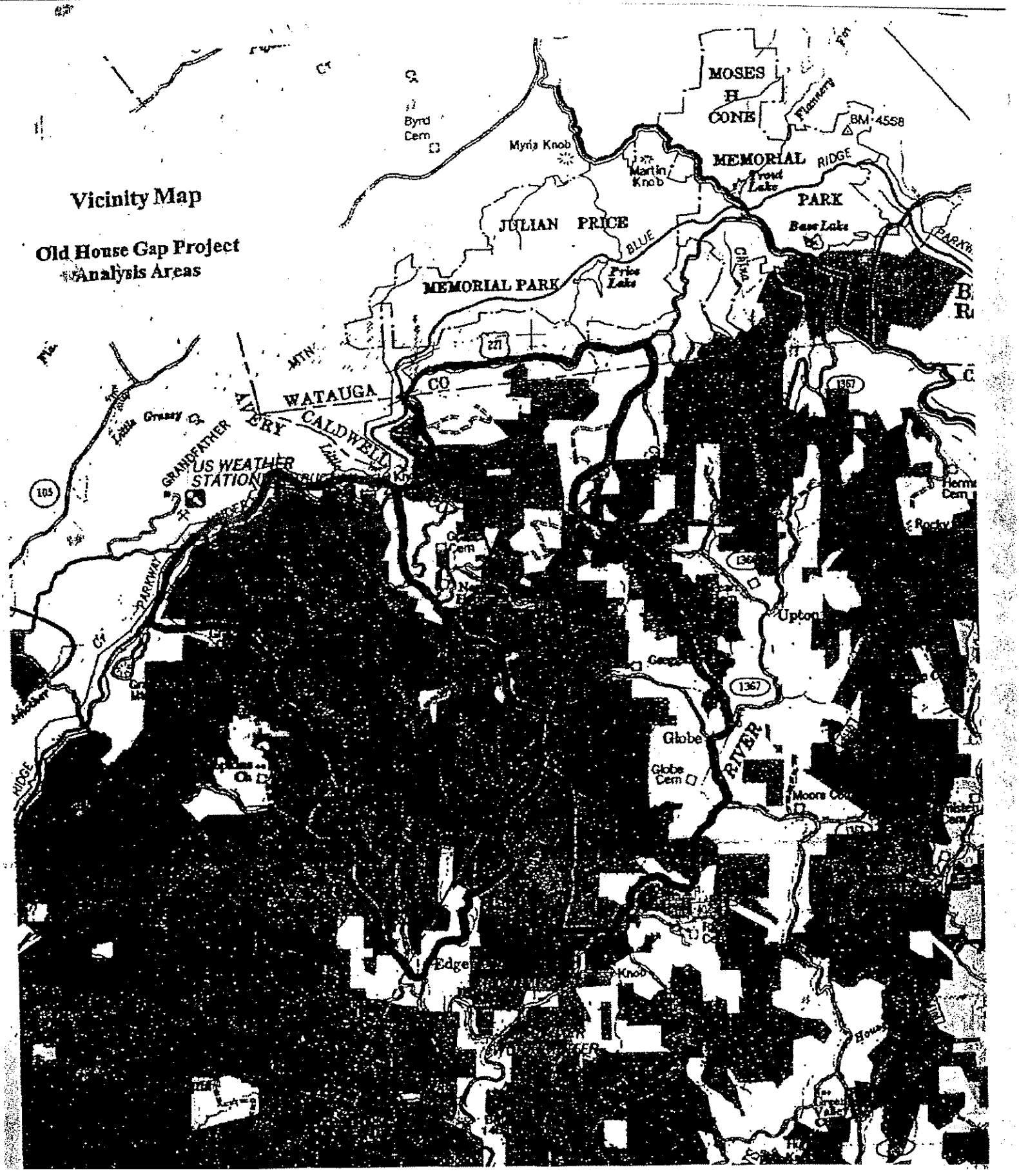
9. Plant individuals or groups of persimmons and/or native crabapple trees in log landings.

10. Identify a contiguous 424-acre medium patch of old growth in the Upper Wilson Creek watershed and contiguous 50-acre small patches (200 acres total) in compartments 69, 70, 77, and 78.

Project Proposal Map

Old House Gap Project
Management Activity Units




Vicinity Map
Old House Gap Project
Analysis Areas
MOSES
H
CONE
MEMORIAL
PARK
RIDGE
BM 4558
Flannery
Byrd
Cem
Myra Knob
Martin
Knob
Trout
Lake
Base Lake
JULIAN PRICE
MEMORIAL PARK
BLUE
Price
Lake
China
221
1367
WATAUGA
CO
AVERY
CALDWELL
Little Grassy Cr
GRANDFATHER
US WEATHER
STATION
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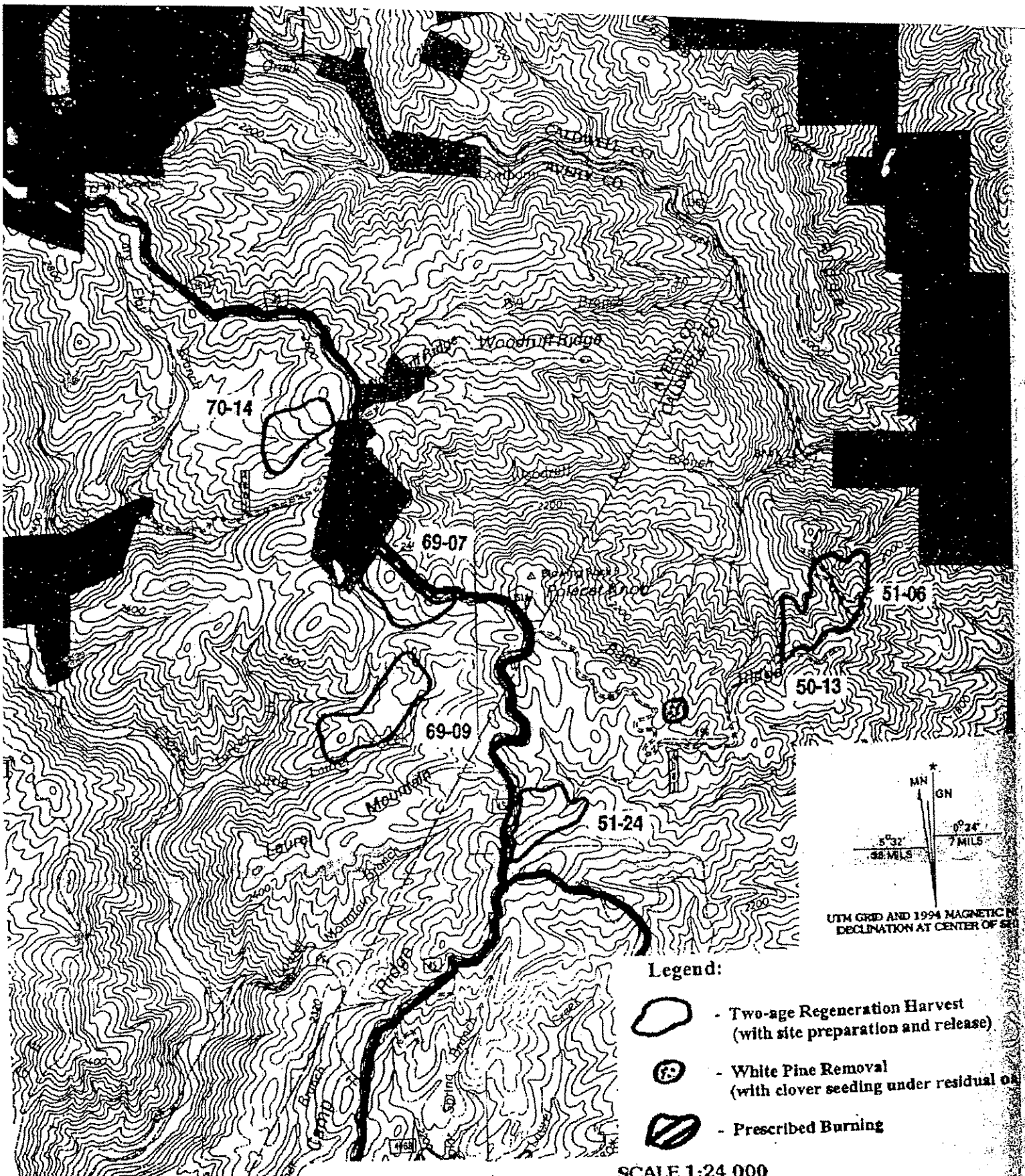
Herm
Cem
Cem
RIDGE



70-14
69-07
69-09
51-06
50-13
51-24
Woodruff Ridge
Laurel Mountain
Legend:
- Two-age Regeneration Harvest (with site preparation and release)
- White Pine Removal (with clover seeding under residual oa
- Prescribed Burning
SCALE 1:24 000
UTM GRID AND 1994 MAGNETIC N
DECLINATION AT CENTER OF SH
MN
GN
7 MILS

United States Department of Agriculture | Forest Service | Grandfather Ranger District | 109 East Lawing Drive
I-40 Exit 90 (Nebo-Lake James)
Nebo NC 28761-9707

File Code: 1950

Date: November 1, 2005

Dear Interested Reader:

On June 9, 2005, my office initiated scoping for the Old House Gap project located within the Upper Wilson Creek and Anthony Creek analysis areas and within compartments 50, 51, 69, 70, 77, and 78. Since this project was initiated, I have determined the proposal inadvertently had temporary road construction, timber harvest, and prescribed burning activities scheduled within the Wilson Creek Inventoried Roadless Area (IRA). I have decided to correct the proposal by removing temporary road construction, timber harvest, and prescribed burning from within the IRA.

Current interim direction from the USDA Forest Service's National Headquarters states that *Inventoried roadless areas shall, as a general rule, be managed to preserve their roadless characteristics*. Under this interim direction, with few exceptions, any proposed *road construction or reconstruction or timber projects* within IRAs would require the prior approval of the Chief of the Forest Service. I believe a majority of the objectives of the Old House Gap project as stated in the June 9, 2005, scoping letter can be achieved without entry into this IRA.

Enclosed with this letter is a corrected proposal and map for the Old House Gap project. I welcome your comments on this clarified proposal. Please submit your comments by ***November 18, 2005***.

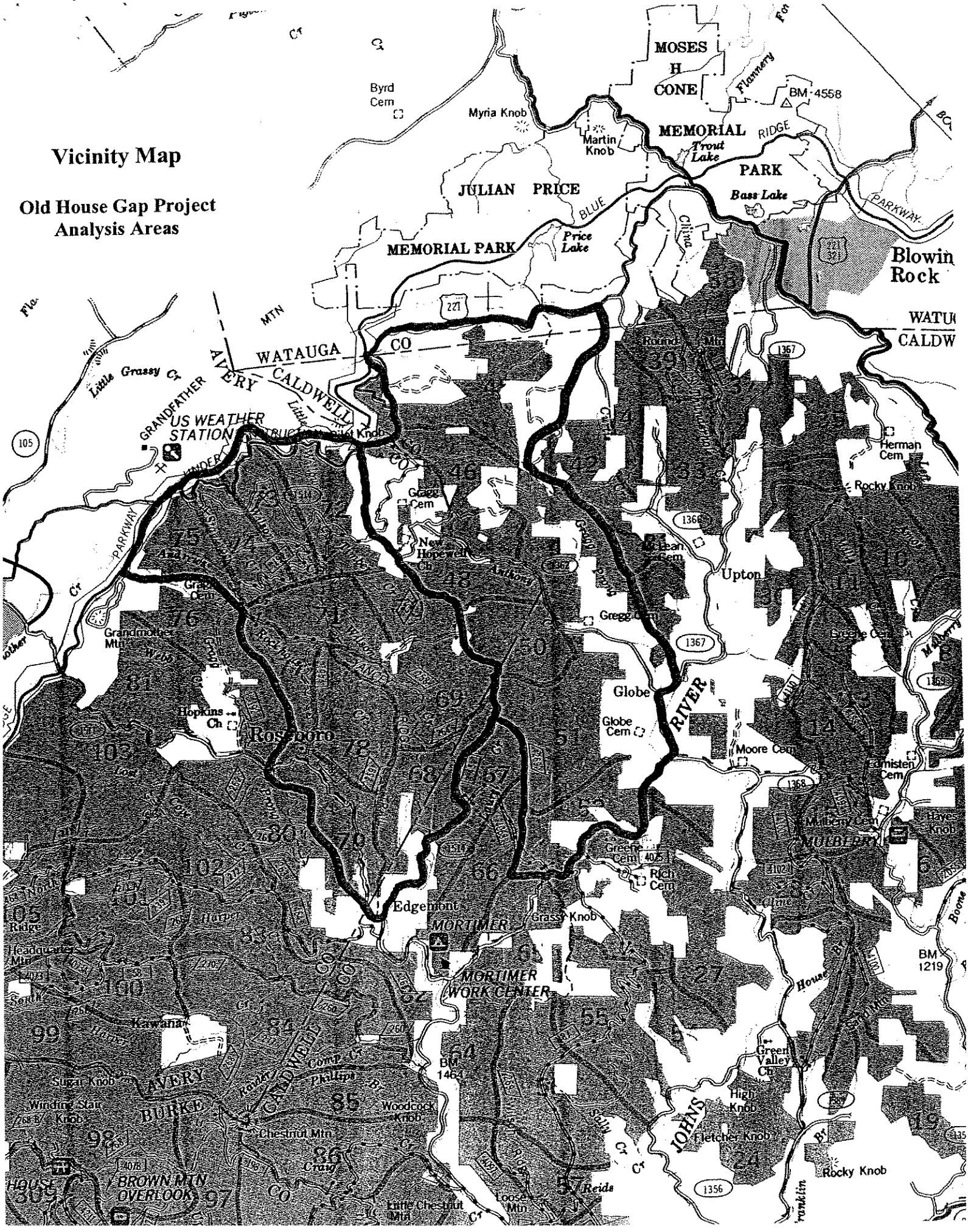
Feel free to contact Greg Van Orsow, Project Leader, or me at 828-652-2144, or Michael Hutchins, Interdisciplinary Team Leader, at 828-682-6146 if you have questions or need additional information regarding this proposal. Comments may be mailed to: Grandfather Ranger District, ATTN. District Ranger, 109 East Lawing Drive, Nebo, North Carolina 28761 or e-mailed to: comments-southern-north-carolina-pisgah-grandfather@fs.fed.us. I appreciate your continued interest in management of the Pisgah National Forest.

Sincerely,

Bonnie P. Amaral

BONNIE AMARAL
Acting District Ranger

Enclosures


Vicinity Map
Old House Gap Project
Analysis Areas
MOSES H CONE MEMORIAL PARK
JULIAN PRICE MEMORIAL PARK
Trout Lake
Bass Lake
Price Lake
Blowin Rock
BLUE RIDGE PARKWAY
WATAUGA CO
AVERY CALDWELL
GRANDFATHER
US WEATHER STATION
Little Grassy Cr
Roseboro
Edgemont
MORTIMER
MORTIMER WORK CENTER
Globe
Globe Cem
Upton
Gregg Cem
New Hopewell Ch
Herman Cem
Rocky Knob
Moore Cem
Edmisten Cem
Mulberry Cem
MULBERRY
Hayes Knob
Greene Cem
Rich Cem
Grass Knob
Green Valley Ch
High Knob
Fletcher Knob
JOHNS
Rocky Knob
Woodcock Knob
Chestnut Mtn
Little Chestnut Mtn
Loose Mtn
Kawana
Sugar Knob
Winding Stair Knob
BROWN MTN OVERLOOK
Hopkins Ch
Grandmother Mtn
Myria Knob
Martin Knob
Byrd Cem
BM 4558
BM 1219
BM 1464
Round Mtn
Headquarters Mtn
Ridge
BURKE
RIVER
MULBERRY
Phillips
Craig
Reids
Sally Cr
House Br
Franklin Br
Comp Cr
Little Grassy Cr
Flannery
China
Anthony
Wilson
Webb
Harper
Cline
Boone
Mulberry
Greene
Lean
Gregg
Grass
Cline
Cr
Br
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Parkway
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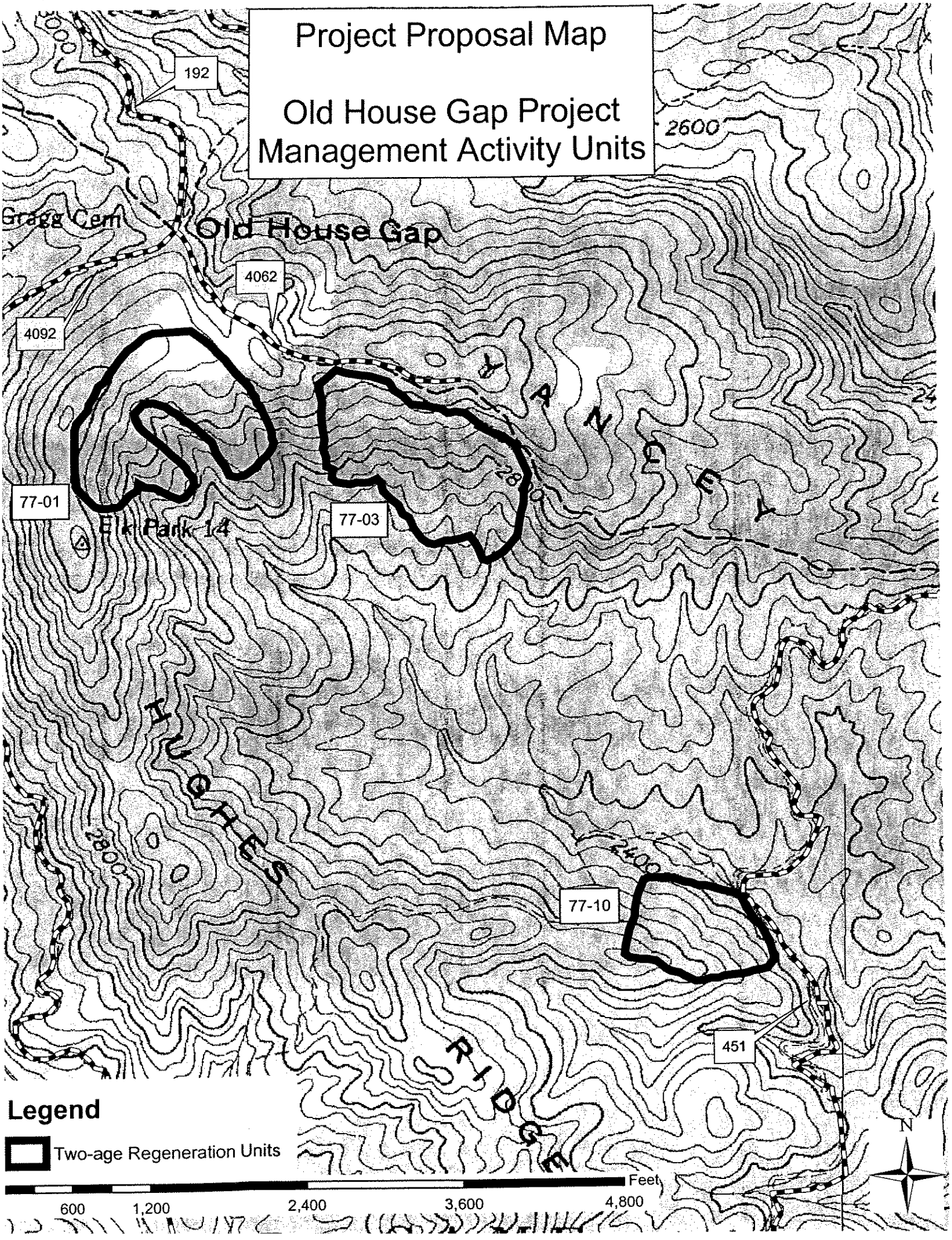
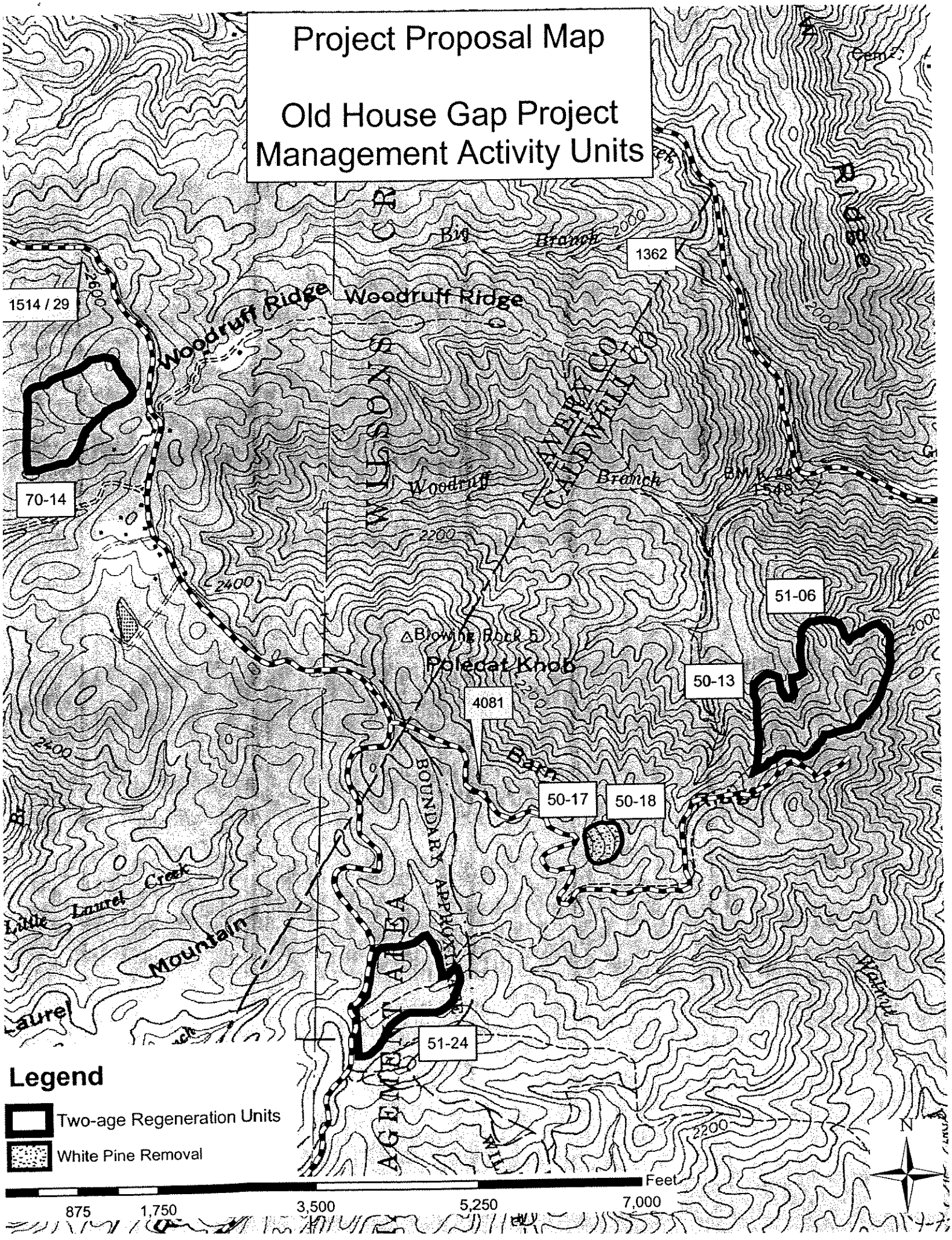
1389
1102
105
105
221


Project Proposal Map
Old House Gap Project
Management Activity Units
192
Gragg Cem
Old House Gap
4062
4092
77-01
Elk Park 14
77-03
77-10
451
2600
2800
2400
Legend
Two-age Regeneration Units
Feet
600
1,200
2,400
3,600
4,800
N


Project Proposal Map
Old House Gap Project
Management Activity Units
1514 / 29
70-14
1362
51-06
50-13
4081
50-17
50-18
51-24
Woodruff Ridge
Woodruff Ridge
Big Branch
Woodruff Branch
Blowing Rock 5
Polecat Knob
Barn
Little Laurel Creek
Mountain
Laurel
Legend
Two-age Regeneration Units
White Pine Removal
Feet
875
1,750
3,500
5,250
7,000
N