

APPENDIX H: CNF RESPONSE TO COMMENTS ON THE DRAFT EIS AND PROPOSED LMP

The USDA Forest Service Content Analysis Enterprise Team (CAET) in Salt Lake City, Utah received letters, emails, and CDs with comments on the Draft EIS and proposed LMP. The CAET read each letter, identified, categorized and summarized the comments for all five southern Appalachian national forests. The CAET report facilitated the ability of the Cherokee National Forest (CNF) to respond to the comments. This appendix is the set of responses to those issues raised in those comments that relate to the Cherokee National Forest. The CAET extracted concern statements from the material submitted, coded them, and organized them into eight chapters and one supplement as follows:

- Chapter 1 – Process, planning, policies, and laws
- Chapter 2 – Alternatives
- Chapter 3 – Environment
- Chapter 4 – Transportation
- Chapter 5 – Recreation
- Chapter 6 – Special designations/lands
- Chapter 7 – Natural resources management
- Chapter 8 – Social and Economic Values
- Supplement: EPA Letter

The Public Concern statements listed below represent the concerns applicable to the CNF. The reader will notice that the “Code” numbers are not consecutive. This occurs because the CNF chooses to report only on the comments applicable to the CNF, and deleted all concern statements not addressing issues in Tennessee. The entire CAET report is a part of the process record for the CNF LMP revision.

Code	Concern	Response
1-1.	Public Concern: The Forest Service should recognize that the PRLMP places too much emphasis on project level analysis.	The revised LMP is a strategic document that makes decisions on desired conditions, goals, objectives, standards, management prescription allocations, land suitability, monitoring requirements, establishing an Allowable Sale Quantity, making recommendations for Wilderness Study Areas and Wild and Scenic Rivers, and where applicable, consenting to oil and gas leasing. Any further decisions on how to meet this strategic plan direction is best addressed at the project level.
1-2.	Public Concern: The Forest Service should document the need for change from the existing forest plans in the PRLMP.	The need for change is identified by the issues that need to be addressed in the planning process. These issues are identified in Chapter 1 of the EIS. The material supplied by a CNF specialist identifies one possible way of managing the CNF, but not the only way. The other issues need to be considered and addressed. The desired conditions identified in the LMP are those deemed necessary to address these multiple issues. Also the role of the MIS is different from the way they were used in the 1986 LMP. Since the original planning process essentially used the MIS to represent all the species on the CNF, more MIS were identified. Now, MIS are viewed as only one part of the overall strategy in developing plan direction for addressing wildlife habitat needs.
1-5.	Public Concern: The Forest Service should establish a realistic time period for revising the forest plan.	The time frame is (and has been) adjusted when needed. While we were on a tight time frame to make changes between the draft EIS and final EIS, time was allocated to make the changes that were needed in the documents, as well as any re-analyses (such as rerunning the Spectrum model) that were needed
1-6.	Public Concern: The Forest Service should ensure that forest plan goals and standards are tied to issues.	The CNF leadership team reviewed and approved all direction provided in the revised LMP. The direction is in response to public issues, management concerns and resource protection and development opportunities. The leadership team review provides the necessary integration of the planning direction. The monitoring program is intended to fall within the budget guidelines. Monitoring plans are to be responsive to identified issues and sufficient to meet legal requirements for monitoring soil, water, air, wildlife and fish, vegetation, and other resources. Monitoring questions and elements tie back to the issues as they led to the identification of plan goals, objectives and standards through the planning process.
1-8.	Public Concern: The Forest Service should revise and release for comment the PRLMP and DEIS before the publication of the final revised plan and EIS.	The process laid out in the National Forest Management Act implementing regulations (36 CFR 219) and the National Environmental Policy Act and its implementing rules do not require a second draft EIS. A supplemental EIS may be issued if the agency decision-makers feel that substantially new information has been identified. No significant new information has been found in this case. See response for concern 7-184.
1-11.	Public Concern: The Forest Service should not allow the current administration to pressure the agency in the forest plan revision process.	The reason for the selection of Alternative I is clearly documented in the Record of Decision.
1-15.	Public Concern: The Forest Service, as required by NFMA and the Endangered Species Act, should proceed with formal consultation with the U.S. Fish and Wildlife Service.	<p>“Consultation” is a process for which Federal agencies review their proposal(s) with the Fish and Wildlife Service. It may either be informal or formal for each species depending on the findings of the Biological Assessment completed by USFS biologists. The consultation process is completed when the USFS receives a concurrence or a biological opinion for that species. It is important to note that the consultation with the FWS is conducted for each species in a proposal, not the entire proposal.</p> <p>There is no requirement in the NFMA to consult with the FWS.</p> <p>The CNF has consulted with the FWS. Consultation was initiated on February 27, 1997. We received written concurrence on our findings for 25 species.</p> <p>CNF actions comply with requirements for management and recovery.</p>
1-17.	Public Concern: The Forest Service should develop better relationships with local governments.	The public has been adequately informed about the opportunities for involvement in the plan revision process. This is documented in Appendix A of the EIS.
1-19.	Public Concern: The Forest Service should not allow environmental groups to dictate National Forest System lands policy.	The responsible official (in the case of a LMP this is the Regional Forester) must consider comments from all interested agencies, tribes, groups, organizations, and individuals. The decision, which is documented in the Record of Decision, must be based on a determination of the Net Public Benefit of the action. The “Rationale for the Decision” documents the decision.
1-19A	Public Concern: The Forest Service should have better involved the public in the planning of Appalachian Trail issues.	<p>The Appalachian National Scenic Trail is administered by the Secretary of Interior in consultation with the Secretary of Agriculture, and managed as a partnership between the Forest Service, local Appalachian Trail Clubs, and the Appalachian Trail Conference (ATC). The National Trails System Act specifies that for trails such as the Appalachian Trail, we should, “encourage and assist volunteer citizen involvement in the planning, development, maintenance, and management” of these trails (Sec. 2(c)). The Act further specifies in Section 5(e), that the Appalachian Trail Conference should work with the Secretaries in the development of a “comprehensive plan” for the Appalachian Trail (AT). A Memorandum of Understanding (MOU) between the Forest Service and the ATC has also been signed by the Chief of the Forest Service.</p> <p>As partners, we met with the ATC and the local AT Clubs to discuss how to coordinate the management of the AT, as we do with any of our partners. As partners, we considered their input, but it was still the decision of the Forest Service as to what to ultimately include in Management Prescription (MP) 4A. Drafts of RX4.A have been on the web and available for the public to review. There have been numerous public meetings and open IDT (interdisciplinary team) meetings where the proposed management direction of the national forests have been discussed. There was also the opportunity for the public to provide comments during the public’s review of the revised LMP. The public’s concerns on the management of the AT have been considered in developing the direction found in the revised LMP.</p>
1-20.	Public Concern: The Forest Service should not allow industry groups to dictate National Forest System lands policy.	The reason for the selection of Alternative I s clearly documented in the Record of Decision. The public involvement process is documented in Appendix A of the EIS.
1-21.	Public Concern: The Forest Service should provide meaningful opportunities for citizen involvement in National Forest System	The Forest provided many opportunities for this involvement by making available the draft documents, taking comments for at

	lands management decisions.	least 90 days, holding meetings, and analyzing all comments
1-25.	Public Concern: The Forest Service should have better involved the public in the forest plan revision process.	See comment response 1-21
1-28.	Public Concern: The Forest Service should not overemphasize the role of public input in the forest plan revision process.	The reason for the selection of Alternative I s clearly documented in the Record of Decision. The public involvement process is described in Appendix A of the EIS.
1-29.	Public Concern: The Forest Service should have better integrated public input from the August, 2002 public meetings into the preferred alternative.	Comments allude to the CNF "ignoring" public comments received during the earlier planning process. This is not the case. The public meetings held in August of 2002 were very helpful to the Forest planning process. In the final decision, all input is considered in balancing the final decisions about the LMP.
1-30.	Public Concern: The Forest Service should explain why drastic changes were made to the draft forest plan without public input.	The changes referred to as "drastic" were made before the Draft EIS was released. Technically, there is no public review draft until the actual DEIS is released. The earlier, publicly-released, versions were not required under the NEPA. Changes between the draft and final EIS are not unusual; in fact, they are expected as the decision-making process works through all of the comment and analyzes the factors involved.
1-30.a	Particularly in the latter stages of the revision process.	The CNF considered input from many sources throughout the revision process. CNF managers never yielded the decision making authority for the national forest. The CNF managers reviewed and deliberated over all direction presented in the revised LMP, and every prescription allocation. It was not until later in the process that the planning team had sufficiently well developed proposals for the CNF managers to review. When changes were necessary, they were discussed and made.
1-31.	Public Concern: The Forest Service should require a new comment period if there are significant changes from the draft plan to the final plan.	A new comment period, and a supplemental EIS may be required if the responsible official decides that significantly new information is available or if changes in the decision are outside the range of the alternatives already considered in the draft EIS. In this case, no new information is being presented and the range of the alternatives presented in the draft EIS encompasses the decision which is being made.
1-34.	Public Concern: The Forest Service should hold public hearings later in the comment period and conduct meetings in the population centers of Tennessee.	All interested individuals have had access to the revision process. This is disclosed in Appendix A of the EIS.
1-43.	Public Concern: The Forest Service should extend the comment period.	The responsible official has provided adequate opportunities for public comment and dissemination of information on the analysis and the decision being made.
1-45.	Public Concern: The Forest Service should collaborate with interested parties to resolve National Forest System lands issues.	The CNF carried out a collaborative process in determining what the public wants to see in this plan. Issues were discussed openly and debated at a variety of times and places.
1-46.	Public Concern: The Forest Service should collaborate with state agencies to further aquatic conservation goals.	The revised LMP in the "Watershed" section of Chapter 2, states, "restoration of healthy, diverse and resilient watersheds, which include not only the water, but also the soil and air, [are] given high priority in all ... management activities. ... The CNF works collaboratively with local governments... to identify priority watersheds and improve their conditions..."
1-47	Public Concern: The Forest Service should ensure that appropriate research is integrated into the PRLMP.	The National Forest System is prevented from conducting extensive research. The NFS coordinates with the Forest Service Research Branch and other research oriented organizations to conduct needed research. The CNF continues to coordinate with the appropriate organizations to ensure appropriate research needs are identified. Monitoring of LMP implementation ensures that actual outcomes are within acceptable ranges of the projections.
1-48.	Public Concern: The Forest Service should ensure that the effects analysis provides useful information to the decision maker and the public.	The WHI (renamed Watershed Condition Ranking, WCR) includes past, present, and future logging, oil and gas development, and road development. Sedimentation was modeled by the activities proposed in each alternative. If the change in sediment rates in any alternative fell within the range of tolerance determined by the species-sediment relationship, the effect of the alternative did not change. The purpose of the Watershed Health Index and associated analyses was designed to identify large-scale attributes that may contribute to maintenance of aquatic systems. Further, the relationship between the proportional increase in sediment and endemic fish species is consistent with current scientific thinking related to the dynamic nature of species response to disturbance (i.e. the ranges of generalist species will expand as those of specialists contract). It is reasonable to assume that changes in the proportion of endemics accompanies disturbance in the watershed. However, in response to comments the WHI has been modified and cutoffs based on forest service ownership, riparian landuse and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion. Different regions and drainages support different levels of endemism as indicated by least-disturbed reference conditions. Although data from all southern Appalachian forest were not used to develop the model, the data was stratified by physiographic province and based on species described as highland endemics (those that evolved in high elevation conditions). Therefore, the ecological traits that make the species used in the analysis sensitive to disturbance should be similar to other highland endemics. A subsequent model, using data from Virginia, supports this hypothesis.
1-51.	Public Concern: The Forest Service should ensure that adequate information on species.	Unfortunately, habitat needs and distributions of many species in the southeastern United States are unknown. Until habitat relationships and species distribution are determined, the Forest Service will use the best available information to determine management direction.
1-52.	Public Concern: The Forest Service should base the draft forest plan on sound science.	The selected alternative is the result of the best effort to resolve the multiplicity of issues this LMP addresses. Many issues conflict with each other, so efforts are made to find the "middle ground" where it could best address multiple issues at the same time. Efforts to define this "middle ground" were dependant upon sorting through the best scientific information available, interdisciplinary team interactions, public input from the various public meetings held throughout this whole planning process, meetings with our various partners, etc. There is no single "source" of information or single "viewpoint" that "drove"

		this decision. See the Record of Decision for more information on the rationale behind selecting Alternative I.
1-53.	Public Concern: The Forest Service should ensure that maps are easy to read.	The maps distributed with the DEIS and Draft LMP were in the same format as the maps displayed at our district offices and at the public meetings throughout the revision process. They are schematic maps for displaying Management Area designation and Prescription Allocation, along with general geographic information.
1-54.	Public Concern: The Forest Service should improve the “textures” of polygons in GIS maps.	The CNF published maps similar to maps displayed throughout the revision process. They are schematic maps for displaying Management Area designation and Prescription Allocation, along with general geographic information. The maps are not intended for field or navigational use.
1-56.	Public Concern: The Forest Service should include, in the map sets, maps of the canyons on the forest.	The maps distributed with the DEIS and Draft LMP were in the same format as the maps displayed at our district offices and at the public meetings throughout the revision process. They are schematic maps for displaying Management Area designation and Prescription Allocation, along with general geographic information. The maps are not intended for field or navigational use.
1-57.	Public Concern: The Forest Service should be under the jurisdiction of the Department of the Interior and not the Department of Agriculture.	The proposal is outside the scope of the proposal and is not a forest planning decision, as disclosed in Chapter 1 of the revised LMP.
1-61.	Public Concern: The Forest Service should consider the role of stressors on aquatic species.	The Forest Service did consider the role of stressors in aquatic species – see process record: Aquatic Biological Resources .
1-63.	Public Concern: The Forest Service should ensure that the appropriate funding is in place to implement the PRLMP.	The Forest Service has limited discretion in setting budgets for LMP implementation. The CNF identifies annual funding needs at several constraint levels, each reflecting a different level of plan implementation. An unconstrained level of funding is used to identify the full funding needs for the highest level of plan implementation. Actual funding ultimately is the purview of Congress and the President. Funding is a recognized limiting factor that controls the degree and speed to which the planned goals and objectives can be accomplished.
1-64.	Public Concern: The Forest Service should seek additional funding to conduct monitoring.	Monitoring is an essential part of the LMP from which the funding need is established. See response to concern 1-63.
1-67.	Public Concern: The Forest Service should specify, in the final forest plan, the effects of the current administration’s outsourcing initiative.	The initiative is a competitive sourcing could eventually have impacts on the CNF; however, no scenarios have been developed to predict these. Other than reasonably foreseeable budgets, administrative process is not considered in land and resource management planning or the NEPA that is required to accompany it.
1-68.	Public Concern: The Forest Service should better integrate the different disciplines within the agency.	Planning Teams, supported by the Regional Office supplied many different disciplines. The Interdisciplinary process is, by regulation, an integrated process. Specialists in all major resource areas must work cooperatively on jointly developed direction for the plan.
1-68.a	To accomplish multiple use goals	The CNF leadership team reviewed and approved all direction provided in the revised LMP. The direction is in response to public issues, management concerns and resource protection and development opportunities. The leadership team review provides the necessary integration of the planning direction.
1-70.	Public Concern: The Forest Service should conduct natural resource education programs for the public.	This is a good suggestion and one which is carried out on every national forest to some degree. Environmental education is a very valuable tool for national forest management and can be done to the extent that budgets allow. Land and resource management planning does not normally address environmental education and, in the case of this and the other southern Appalachian forests, it is not included. Other programs on the forests do address environmental education.
1-72.	Public Concern: The Forest Service should continue to provide environmental documents in electronic form.	The CNF will continue to utilize current technology to provide information to everyone interested. Public involvement will continue to be a cornerstone for strategic and project planning. T
1-75.	Public Concern: The Forest Service should make recommended editorial/technical changes to the documents.	Corrections to models, text and maps are made as the need is recognized. The public review process of draft documents is important for identification of such needs.
1-81.	The Forest Service should explain Table C.1.20 which shows that recreation/wildlife/fish impacts are constant throughout all alternatives.	Refer to tables in “Economic Impact” section (24.2.2) if the EIS. Specified values vary by alternative. We no longer measure Use with Visitor Day nomenclature. Recreation measurement units Use for the SA forests were NVUM data or proxies for this data. NVUM data was given for "National Forest Visits", "Site Visits", and "Wilderness Visits". NVUM also gave participation rates (percentages) by various Recreation and Wildlife activities. The units we used in IMPLAN to determine impacts were TRIPS for Resident and Non-resident "Overnight On National Forest Use"; "Overnight Off National Forest Use"; and "National Forest Day Use", because this is the measurement we had in our recreation expenditure files. Each of these metrics (Overnight On National Forest Use; Overnight Off National Forest Use; and National Forest Day Use) measured in TRIPS were estimated from the NVUM forest data and converted from VISITS to TRIPS. This was accomplished by considering Recreation and Wildlife activity percentages and where they might fit within these expenditure measurement metrics.
1-82.	Public Concern: The Forest Service should specify research needs, as recommended in Appendix I.	Research needs are identified in Appendix I of the revised LMP. The National Forest Management Act, through its implementing regulations, requires, in Section 36 CFR 219.28, that such research needs be identified in forest planning. The Regulation also states that “particular attention should be given to research needs identified during the monitoring and evaluation...” One commenter supplied a list of some suggested areas of research for consideration. We have considered these. Most are questions that will be addressed through monitoring and evaluation under the plan. Most research on national forests is done through Forest Service’s research branch and in response to monitoring.
1-83.	Public Concern: The Forest Service should include, in Appendix I, a listing of research needs.	See response to concern 1-82.
1-84.	Public Concern: The Forest Service should tailor the language in Appendix B to reflect the process used in developing the five Southern Appalachian Forest Plans.	There are some sections in Appendix B where all southern Appalachian national forests used similar write-ups, but for the most part, Appendix B was written to reflect the analysis process used on the CNF.
1-87.	Public Concern: The Forest Service should ensure that the PRLMP is consistent with national and regional guidance.	The development of the revised LMPs for the national forests in the southern Appalachian (with the exception of the Nantahala-Pisgah NFs) involved a high level of coordination between the Regional Office and the five forest planning revision efforts. This

		coordination started with the development of the Southern Appalachian Assessment, the issuance of the Notice of Intent, and then the identification of the “common” issues to be addressed. Regional guidance was provided in such things as the regional old growth guidance, guidance on determining the roadless area inventory, guidance on evaluating the roadless areas for possible wilderness designation, guidance on watershed analyses, a common set of Management Prescriptions, common “themes” for the alternatives, a common set of “design criteria” for developing Alternative I, and common outlines for the LMP and the EIS. In addition to this guidance, teams were set up which included individuals from both the national forests and the Region to develop a common approach to developing LMP direction and environmental impact analyses. These teams included one for addressing fisheries and wildlife issues, one for addressing recreation/ wilderness /scenery issues, one for addressing riparian/watershed issues, and another informal team to address forest management issues. Lastly, all the southern Appalachian planners met periodically to work on coordination/consistency issues. All this was used to develop a regionally consistent framework for developing revised forest plans in the southern Appalachians. However, there were also “local” issues, concerns, publics, situations, circumstances, that needed to be addressed. So while there was the “regional framework” for conducting planning, the national forests could vary within that framework to meet local needs.
1-88.	Public Concern: The Forest Service should ensure that the PRLMP is consistent with the Forest Service’s Natural Resource Agenda.	The Natural Resource Agenda has been considered and is incorporated into the revised LMP as disclosed in the “Summary of Issues” section of Chapter 1. The goals of restoring ecosystems, preventing exotic plants from spreading, conserving/restoring threatened/endangered/locally rare species and their habitats, closing/rehabilitating recreation sites with unacceptable damage, curtailing unauthorized recreation use, and improving the scenic integrity of certain areas; are all addressed in the Revised LMP through either goals, objectives or standards.
1-89.	Public Concern: The Forest Service should include a field guide or implementation guide as appendices to the forest plan.	Management direction in the 1986 LMP included both standards and guidelines for management actions. Current regional agency practice is to include only management direction meeting the definition of a standard in the revised LMP. (Standards are specific resource management directions and often preclude or impose limitations on management activities or resource uses, generally for environmental protection, public safety, or to resolve an issue.) Some items were suggested during the planning process that are essentially the “how to’s” of implementing the LMP. These guides for implementation may take the form of field guides or handbooks and will be kept separate from the revised LMP.
1-91.	Public Concern: The Forest Service should incorporate the Healthy Forest Initiative into the PRLMP.	Many elements of the Healthy Forest Initiative have been considered and is incorporated into the revised LMP Increased efforts to prevent catastrophic wildfire and other damaging elements to forest ecosystems are specified throughout Chapters 2 and 3 of the revised LMP.
1-93.	Public Concern: The Forest Service should incorporate the general direction of the revised planning rule in the Region 8 forest plan revisions.	There are many good concepts presented in the proposed planning rule of 2002, and where those concepts were consistent with the 1982 planning rule, we attempted to implement those concepts. However, since the “revised” planning rule is still draft and subject to change, we cannot implement something that is draft and we have to follow the rule that is in effect, which is the 1982 planning rule.
1-95.	Public Concern: The Forest Service should ensure that regional consistency takes precedence over the autonomy of individual forest plans.	Throughout the planning process for the national forests in the southern Appalachians, efforts have been made to meet both regional consistency concerns as well as providing the flexibility to address local concerns. Often times, efforts to address regional consistency would be in conflict with meeting local needs, and visa versa. In order to address these often mutually exclusive efforts, the strategy was developed where there would be a common framework for the revised LMPs and EISs (in terms of such things as a set of common issues, a common set of management prescriptions to choose from, and common approaches to conducting various planning analyses). However, within this common framework, the individual national forests could make adjustments to meet their local situation (this included “localizing” the desired condition statements, goals, objectives, standards and management prescription allocations).
1-96.	Public Concern: The Forest Service should use consistent formants across the five forest plans.	To the extent that it was possible consistent formats are used for the LMPs and EISs. We felt that this was important since the plans would come under intense public review and we wanted that review to go smoothly and make it possible for cross-forest comparisons.
1-100.	Public Concern: The Forest Service should comply with NEPA.	The NEPA process has been followed in the development of the EISs that accompany the Revised Forest Plans.
1-102.	Public Concern: The Forest Service should consider that the PRLMP and accompanying DEIS violates provisions of NEPA.	The alternatives and desired conditions are not arbitrary. Alternative C considers, but not in detail, a custodial level of management that essentially allows the forest to be shaped by natural disturbances. Alternative G provides large acreages late successional forest. Naturally generated disturbances cannot be relied upon for the desired timing, size, and distribution needed for regeneration and openings in other alternatives. See responses to the following comments: 7-59, 7-59; 3-437; 7-185, 7-186; 2-3; 2-5; 2-12; 7-310; 2-30; 2-32.
1-102.b	By not adequately analyzing cumulative impacts.	The EIS discloses the environmental effects, including cumulative effects of the proposed programmatic alternatives commensurate with the LMP stage of decision making. The LMP generally does not make final irreversible or irretrievable decision. See also the responses to comments 3-91.
1-102.c	By having the Content Analysis Team in Salt Lake City analyze the comments.	Comments were read, sorted, catalogued, and grouped by the Content Analysis Team—the responses were made by the CNF and Regional Office ID Team members and specialists.
1-102.d	By not analyzing all viable alternatives.	The range of alternatives is adequate. See responses to the following comments: 2-4; 667; 6-17; 2-5; 2-12; 7-222; and 3-433.
1-102.f	By not taking a “hard look” at the environmental consequences of agency actions.	The team did consider the information available concerning the natural processes that occur in the southern Appalachians. Acres in many of the management prescription allocations do not have scheduled entries to create successional forests, and instead rely primarily on natural processes. See responses to comments 3-437 and 7-58.

1-102.e	By not providing a full and fair discussion of significant information.	See response to the two preceding subtopics and responses to comments 3-43 and 7, 7-58,
1-102.g	By failing to disclose or respond to the opposing evidence and analysis presented by an employee of the agency.	See response for concern 7-184.
1-102.g	By not addressing the uncertainties and risks associated with the succession-based management approach.	The management activities contemplated under the alternatives are not new and uncertain practices. The effects of these activities at a programmatic level are disclosed in the EIS. Site-specific effects will be analyzed at the project level. See previous responses.
1-102.h	By not including all relevant information in the documents.	There is no requirement that all information in the process record be in the DEIS or that all theories and information reviewed be included in the record. NEPA documentation was not intended to be encyclopedic.
1-102.i	By not using good data and relying on speculation.	The first part of this comment lacks specificity as to any information or data that the commenter claims was not good. With respect to the Biological Opinion, in accordance with FWS procedures, the Biological Opinion is issued when the ROD is issued. NatureServe is a reputable contractor we used to create a database on species and their habitats.
1-102.j	Because the DEIS fails to identify and analyze impacts in many areas.	See response to comments 3-421, 3-433, and 3-465.
1-103.	Public Concern: The Forest Service should consider that the PRLMP violates provisions of the National Forest Management Act by failing to disclose records and studies relevant to the revision process.	See the response to concern 7-184.
1-103.a	By failing to model any non-timber outcomes of the action alternatives presented in the DEIS)	The desired conditions of the management prescription allocations defined the interactions of the various resources, and what types of actions were compatible or incompatible with each other. Different models were then used to estimate the outcomes of meeting these desired conditions. Spectrum was just one of the tools used in this analysis. The Spectrum models used were not designed to include the estimated outcomes of other non-timber related activities. While Spectrum could be designed to do so, other models were used instead because it was felt that they could provide better results/estimates. A sediment model was built which included information from the Spectrum model. Likewise, wildlife effects models were used that included information from Spectrum and from GIS-based analyses. Recreation estimates were based on information from the National Visitors Use Monitoring Survey. Social and economic models were used that incorporated the results of all of these models to estimate jobs, income, and the present net value of the alternative.
1-105.	Public Concern: The Forest Service should consult with the U.S. Fish and Wildlife Service in order to comply with the Endangered Species Act.	See the response for statement 1-15, above.
1-107.	Public Concern: The Forest Service should recognize that the PRLMP is in violation of the Data Quality Act.	The Data Quality Act (DQA) is an attempt by Congress to ensure that federal agencies use and disseminate accurate information. The DQA requires federal agencies to issue information quality guidelines ensuring the quality, utility, objectivity and integrity of information that they disseminate and provide mechanisms for affected persons to correct such information. Congress enacted the DQA primarily in response to increased use of the internet, which gives agencies the ability to communicate information easily and quickly to a large audience. The comments that led to this Public Concern Statement point to the CNF not providing alternatives to large scale burning programs. This is a process question and not one that turns on providing accurate and complete information.
1-110.	Public Concern: The Forest Service should ensure compliance with the Eastern Wilderness Areas Act.	The CNF, through deliberate considerations and actions during the revision process, complies with the Eastern Wilderness Act. See response to concerns 6-67, 6-20, and 6-26.
1-123	Public Concern: The Forest Service should consider the impact of the new categorical exclusions on the forest planning process.	The LMP identifies the goals, objectives, desired conditions, and standards for managing the CNF. Projects are then planned to implement the LMP. The appropriate level of environmental analysis is then determined for each project. In many cases, a categorical exclusion may be the appropriate level of environmental analysis and documentation.
1-140.	Public Concern: The Forest Service should ensure that the forest plan revision incorporates the ideals of "management by objectives."	We agree that objectives are a key component of the LMP. Goals and desired condition statements describe where we want to end up, but it is the objectives that define the actions/activities needed to meet those goals/desired conditions. Sometimes there is a fine line between goals, objectives, and standards, but we have made every attempt to develop objectives that are clear, understandable, and measurable. The LMP has also been organized to have goals and objectives presented together, so that one can see the objectives that are being used to show the achievement toward reaching a particular goal.
1-141	Public Concern: The Forest Service should address, to comply with NFMA, several research questions.	The National Forest Management Act, through its implementing regulations, requires, in Section 36 CFR 219.28, that such research needs be identified in forest planning. The Regulation also states that "particular attention should be given to research needs identified during the monitoring and evaluation..." One commenter supplied a list of some suggested areas of research for consideration. These have been considered. Most are questions that will be addressed through monitoring and evaluation under the LMP. Most research on national forests is done through Forest Service's research branch and in response to monitoring. Chapter 5, of the LMP, addresses research needs associated with the plan.
1-143.	Public Concern: The Forest Service should, as required by NFMA, implement a comprehensive aquatic conservation strategy.	The CNF participates in recovery plans with the FWS for federally listed species. Standards are specified in the land management plans to protect and conserve all aquatic species.
1-146	Public Concern: The Forest Service should, as required by the Endangered Species Act, implement a comprehensive aquatic conservation strategy.	The CNF participates in recovery plans with the FWS for federally listed species. Standards are specified in the land management plans to protect and conserve all aquatic species.
1-148	Public Concern: The Forest Service should establish a strong Aquatic Conservation Strategy.	The CNF participates in recovery plans with the FWS for federally listed species. Standards are specified in the land management plans to protect and conserve all aquatic species.
1-157.	Public Concern: The Forest Service should ensure compliance with the National Forest Management Act, the Endangered Species Act, and the Clean Water Act.	The revised LMP is in compliance with the National Forest Management Act, the Endangered Species Act, and the Clean Water Act. The revised LMP protects aquatic resources by identifying streams, their beneficial uses and developing standards which protect those resources during management activities. These standards are found in the Riparian Prescription and in

		Forestwide Standards. Further protection will be provided as needed at the project level
2-2	Public Concern: The Forest Service should continue to use the design criteria to guide the formulation of alternatives.	The “design criteria” was used only for the process of developing Alternative I. The other alternatives were developed to meet the “themes” of those alternatives. Themes for developing the alternatives are listed in Chapter 2 of the EIS.
2-3	Public Concern: The Forest Service should evaluate a no commercial logging alternative.	<p>Numerous comments were made about the desire to have the CNF managed under Alternative C, which is an alternative with “minimal human intervention”, or to have an alternative with “no commercial timber harvesting”. These two concepts are closely related and the responses to these concepts are therefore also similar. The rationale for not analyzing these alternatives in detail is described in Chapter 2 of the EIS under “Alternatives Considered But Eliminated From Detailed Study”.</p> <p>Alternative C was an alternative developed and considered, but after additional analysis and developing more alternatives, it was determined that the other alternatives would better meet the purpose and need, and do a better job of addressing all the issues. So it was decided we did not need to continue analyzing this alternative any further.</p> <p>The purpose and need of revising the forest plan is to address the changing conditions that were identified in the Southern Appalachian Assessment, the CNF’s Analysis of the Management Situation, and the changing public values as represented by the 12 common issues. Alternative C would not address all these needs. The Multiple-Use Sustained Yield Act states that the Secretary of Agriculture should “develop and administer the renewable surface resources of the national forests for multiple use and sustained yield of the several products and services obtained there from” (Section 2). Alternative C does not accomplish this. Additionally, in the regulations implementing the National Forest Management Act, the requirement to “maintain viable populations of existing native and desired non-native vertebrate species in the planning area” (36 CFR 219.19) would not be met.</p> <p>Many comments argue that no commercial harvesting is needed to protect watersheds and wildlife. But there are hundreds of different species of wildlife on the national forest, and “human intervention” is needed to provide or enhance the habitats for some of those species. In all the alternatives, the percentage of the forests in “mid- to late-successional” habitats ranges from 51% to 86% of the total forested acreage. Also the riparian corridor prescription is applicable in all the alternatives except Alternative F, and this management will protect the CNF’s aquatic resources. Elsewhere in the LMP, protective measures are in place to protect the watersheds in the CNF.</p> <p>Providing for recreational opportunities is a key component of every alternative, and two of the issues to be addressed with the LMP involve providing for recreational opportunities and managing the forests to protect their scenic resources.</p> <p>Some argue that commercial logging costs the taxpayer or is a subsidy to the timber industry. But having a contractor implement the management actions needed to meet the desired conditions, and returning money to the US Treasury in the process, is often the most cost-effective way to accomplish meeting those objectives.</p>
2-4	Public Concern: The Forest Service should consider a wider range of wilderness and roadless area recommendations.	<p>The alternatives in the EIS provide a range of wilderness recommendations from 86% of the total roadless area acreage being recommended in Alternative G to 0% of the roadless area acreage being recommended in Alternative D. Alternative C, which was an alternative considered, but not in detail, had all of the roadless areas being recommended for wilderness. A portion of every roadless area is recommended for wilderness designation in at least one alternative considered in detail. Also, in Alternatives G, 100% of the acres in the roadless areas will have their roadless character maintained.</p> <p>The range of alternatives displayed in the table labeled “Comparison of Alternatives by Prescriptions” in Chapter 2 of the EIS displays a range of zero through approximately 73,000 acres of roadless area recommended for wilderness. The table entitled “Summary of Roadless Area Allocations by Category by Alternative” displays the effect of the prescription allocation on the inventoried roadless areas of the CNF.</p>
2-4.a.	Public Concern: The Forest Service should not overly rely on the Southern Appalachian Assessment for providing information and data for the DEIS.	The Southern Appalachian Assessment was just one of many sources of information used in the development of the forest plan. It was primarily used to help define the issues to be addressed in the plan, it provided some of the inventories used in the analysis (such as roadless areas and the preliminary inventory of possible old growth forests), it provided some resource information on other (non-NFS) landowners, and it provided information within a regional context for the effects analysis.
2-5	Public Concern: The Forest Service should revise the DEIS to consider a full spectrum of reasonable alternatives.	For the question of providing an adequate range of alternatives for wilderness recommendations see the response to concern 2-4. The range, development, and prescription allocation of alternatives is fully described in Chapter 2 of the EIS.
2-5e	Including an alternative that eliminates commercial logging.	See the responses to concerns 2-3, and 2-12.
2-5j	Including an alternative to prescribed burns and even-aged management.	<p>The alternatives presented in the EIS provide a range of levels of prescribed burning. (See Chapter 2 of the EIS, Comparison of Alternatives, under the Forest Health Issue.) See the response to concerns 7-480, 7-487, 7-488, 7-503, and 7-542 for a description of the reasons why some level of prescribed burning is needed.</p> <p>In terms of even-aged management, the level of management in each alternative is a function of the actions needed to meet the desired conditions of the management prescription allocations. Chapter 2 of the EIS in the Comparison of Alternatives, shows the range of management prescription allocations. See also the responses to concerns 7-244, 7-253, 7-254 7-256, 7-239, 7-261, 7-279, 7-249, 7-437, 7-184 and 7-266 for a description of the reasons why some level of even-aged management is needed.</p>
2-5k	Including alternatives C, H, E, and G.	The EIS in Chapter 2, under Alternatives Considered But Eliminated From Detailed Study, describes the rationale for why Alternatives C and H were not analyzed in detail. See also the responses to PCs 2-3 and 2-12. Alternatives E and G are viable alternatives that were considered in detail. The Record of Decision documents the rationale for why Alternative I was selected over the other alternatives.

2-9	Public Concern: The Forest Service should not provide additional analysis for Alternatives C and G.	The development of alternatives is described in Chapter 2 of the EIS, and the effects analysis is provided throughout Chapter 3 of the same document. Alternative C is not considered in detail, Alternative G is given full consideration..
2-10	Public Concern: The Forest Service should provide an alternative that provides balanced age classes before significant declines occur in forest health and timber quality.	Alternative D discussed in the EIS incorporates a goal of “balanced age classes” on suitable lands. Such a goal is not practical on all lands, due to legal restrictions. The revised LMP contains language that allow the use of “integrated pest management” to address forest health concerns on lands whether suitable or not, where we have legal authority to do so.
2-12	Public Concern: The Forest Service should reinstate and analyze Alternative C.	See response for concern 2-3.
2-15	Public Concern: The Forest Service should not implement Alternatives A, D, or F.	Thank you for expressing your views on these alternatives. All views were carefully considered during development and evaluation of the existing alternatives.
2-16	Public Concern: The Forest Service should implement Alternative D or F.	The Regional Forester looked at all of the alternatives and chose Alternative “I”. Other alternatives were considered and not chosen. The Rationale for this decision is listed in the Record of Decision. See response for 2-15.
2-20	Public Concern: The Forest Service should not implement Alternative A as it may be detrimental to rare species and their habitats.	See response for 2-15.
2-21	Public Concern: The Forest Service should recognize that Alternative A would increase the potential for conflicts among user groups near the Appalachian Trail. .	Prescription 4.A guidance applies equally across all alternatives, where the prescription is allocated, or within the A.T. corridor in the case that the corridor is embedded within another, more restrictive prescription. Prescription 4.A focuses management on meeting the intent of the Appalachian National Scenic Trail, “to protect the A.T. experience, preserve and strengthen the role of volunteers and volunteer organizations, provide opportunities for high quality outdoor recreation experiences, and provide for the conservation enjoyment of the nationally significant scenic, historic, natural and cultural qualities of the land through which the A.T. passes.” This management would aim to minimize user conflicts.
2-23	Public Concern: The Forest Service should modify Alternative B.	There is an almost infinite combination of elements to consider in the development of alternatives. The FEIS includes seven alternatives, each with different levels of access. We believe the range of seven alternatives analyzed in this FEIS provides for a reasonable number of examples covering the full spectrum of options for access to the CNF.
2-24	Public Concern: The Forest Service should implement Alternative D.	See response for 2-15.
2-24a	Because it provides for a healthy forest	See response for 2-15.
2-24b	Because it provides the best potential for meeting the general habitat needs of both large and small game species	See response for 2-15.
2-24c	Because it provides the widest range of opportunity to promote forest health and species diversity through careful selection of timber producing methods	See response for 2-15.
2-25	Public Concern: The Forest Service should not implement Alternative D.	See response for 2-15.
2-25a	Because it does not support enough late to old successional habitat	See response for 2-15.
2-27	Public Concern: The Forest Service should consider that Alternative E did not receive serious consideration.	See Response to Public Concern 2-16. Although this concern is centered on another alternative, the same response applies.
2-28	Public Concern: The Forest Service should implement Alternative F.	See response for 2-15.
2-28a	Because it provides a healthy forest with a good mix of vegetation ages and classes	See response for 2-15.
2-30	Public Concern: The Forest Service should consider that Alternative G did not receive serious consideration.	All alternatives received consideration by the responsible official. The Rationale for the decision to choose Alternative “I” is contained in the Record of Decision. Reading the Record of Decision should give commenters a better understanding of why one alternative was chosen and why another was not.
2-31	Public Concern: The Forest Service should modify Alternative G.	There is an almost infinite combination of elements to consider in the development of alternatives. Alternative D has an age-class distribution goal. Maps of projected old growth areas are provided in the final planning documents. Forest health and pest management direction has been incorporated into every practical prescription in the final LMP.
2-32	Public Concern: The Forest Service should implement Alternative G.	See response for 2-15. See response to Public Concern 2-30.
2-33	Public Concern: The Forest Service should not implement Alternative G.	See response for 2-15.
2-34	Public Concern: The Forest Service should modify Alternative G.	By viewing the “FWRBE Prescription Attributes” table in EIS Appendix B with reference to the “Comparison of Alternative by Prescription” table in Chapter 2 of the EIS, one gets an understanding of how the range of alternatives responds to issues of roads and CNF access. We have developed an adequate range of alternatives to deal with these issues.
2-36	Public Concern: The Forest Service should implement Alternative G.	See response for 2-15.
2-37	Public Concern: The Forest Service should modify Alternative G.	There is an almost infinite combination of elements to consider in the development of alternatives. The table labeled “Comparison of Alternatives by Prescription” in Chapter 2 of the EIS displays a broad range of acreage across prescriptions that preserve roadless and remote characteristics.
2-38	Public Concern: The Forest Service should modify Alternative G.	The range of alternatives, as described in Chapter 2 of the EIS is adequate. Alternative G is unchanged between draft and final EIS.
2-39	Public Concern: The Forest Service should clarify whether the comparison between the Preferred Alternative and the 1985 Plan is a comparison with the 1985 Plan as implemented or as projected.	Alternative F represents a continuation of the 1986 CNF LMP. It includes projections of what could happen in meeting the desired conditions, goals, objectives, standards, and management prescription land allocations identified in the 1986 LMP. It is true that the implementation of the 1986 LMP has not met the original projections because of budget limitations, lawsuits, administrative changes in priorities, etc. Just as actual implementation of the 1986 LMP did not meet projections, it is just as likely that the actual implementation of the revised LMP will not meet projections. This is why projections of outputs are not the

		decisions made in a LMP. A LMP only makes decisions on desired conditions, goals, objectives, standards, and management prescription land allocations. The projections are only used to provide some estimates of what the environmental effects might be as a result of management activities to meet those desired conditions, goals, etc.; and to provide a comparison of alternatives. In order to make all alternatives comparable, the “no action” or “current management” alternative also needs to be based on “projected” outputs, so it is based on the same set of implementation assumptions as all the other alternatives. Alternative F displayed in the EIS is the 1986 LMP expressed in allocation of prescriptions developed for the revision. The comparison of alternatives displays the projected outcomes of applying the allocated prescriptions.
2-41	Public Concern: The Forest Service should explain how Alternative I came to be the preferred alternative.	The rationale for why a particular alternative is chosen is not something that is a part of an environmental impact statement (EIS). An EIS is not a decision document, it discloses the effects of alternative courses of action. At the “Draft” stage, a “preferred alternative” is identified to help facilitate public comment and review. Following that public comment and review, the information in the EIS is updated and a decision is made as to which alternative to select. The rationale for choosing the selected alternative is then documented in the Record of Decision.
2-42	Public Concern: The Forest Service should implement Alternative I.	See response for 2-15.
2-43	Public Concern: The Forest Service should not implement Alternative I.	<p>Alternative I was developed to address many issues, and many people, groups, and organizations were involved in its development. It was developed through iterations of working and meeting with our various publics, and we consulted with our partners in research throughout the process. The FWS has also worked with us throughout the process and they will issue their Biological Opinion prior to the Record of Decision being signed (they do not go through the formal consultation process on draft documents).</p> <p>Alternative I is consistent with the Multiple-Use Sustained-Yield Act and the Organic Act. As for the question on NFMA, the estimates on the methods of logging are found in the “Analysis Results” section of Appendix B of the EIS. For the question on the National Historic Preservation Act, goals and objectives for managing Heritage Resources are found in Chapter 2 of the LMP, along with standards for protecting those resources. There is also the existing Forest Service policy, manual and handbook direction for protecting archeological sites that did not need to be repeated in the LMP.</p> <p>The LMP is designed to avoid and minimize effects on aquatic resources through the forest standards and the riparian corridor management prescription. Concerns about recognizing the importance of transportation are addressed in Chapter 2 of the LMP as well the section on Facilities, Roads, and Access in each prescription in Chapter 3, where goals, objectives, and standards are identified. However, a LMP does not make site-specific decisions on how each road in the transportation system should be managed. There may be an increase in temporary roads over what has occurred in the past few years, but this will be less than the level associated with the original LMP. Also there are numerous mitigating measures that are put in place to ensure that temporary roads minimize their environmental effects.</p> <p>The nature of forest planning is such that compromises have to be an integral part of developing a LMP. If all the publics and all the scientists agreed on what is the “right” way to manage a forest, then developing a LMP would be considerably easier. However, scientists do not agree, and the public has a wide range of wants/needs/concerns with respect to the management of the national forests, as is evidenced by all the comments received.</p> <p>A major emphasis of Alternative I is to manage the forest ecosystems to meet the needs of the wide variety of wildlife habitats found on the national forest. This often includes active management to create those conditions. Forest health is another key component of this alternative. Within this alternative, 278,849 acres have been classified as “suitable for timber production” and periodic, scheduled harvesting activities will take place on these lands. For a majority of the other lands, “unscheduled” and “unplanned” harvesting activities may still take place in order to address forest health needs.</p>
2-46	Public Concern: The Forest Service should conduct a thorough level of analysis on the PRLMP.	The EIS supporting the revised LMP displays a programmatic level of analysis. Prior to implementing any project according to the revised LMP, a subsequent site specific analysis appropriate to the proposal, will be conducted.
2-47	Public Concern: The Forest Service should make a change/modification to the Cherokee National Forest’s Alternative I.	Adequate protection is provided in Alternative I to protect and enhance water quality and aquatic habitats without the making the changes you suggest.
2-49	Public Concern: The Forest Service should implement Alternative I.	See response for 2-15.
2-50	Public Concern: The Forest Service should modify Alternative I.	In consideration of input provided during review of the draft documents, appropriate modifications are incorporated into Alternative I. Proposals to modify the alternative were discussed by the CNF leadership prior to accepting or rejecting the proposal. The resultant Alternative I is displayed in the EIS and revised LMP.
2-51	Public Concern: The Forest Service should not implement Alternative I.	The reasons Alternative I is selected is identified in the Record of Decision. See response for 2-15.
2-52	Public Concern: The Forest Service should modify Alternative I.	There is an almost infinite combination of elements to consider in the development of alternatives. As you indicate, black bear can tolerate some degree of disturbance in the form of timber harvesting. The Black Bear Habitat Management prescription (8.C) is suitable for timber management and allows for up to eight percent early successional habitat (described in the revised LMP).
2-53	Public Concern: The Forest Service should explain the deletion of references to forest commodities and economics in Alternative I.	Refer to Appendix B of the EIS for a more complete disclosure of the analysis process, including reference to the socio/economic modeling and commodity production..
2-54	Public Concern: The Forest Service should acknowledge, in Alternative I, the value of timber harvesting as a viable form of ecosystem management.	Throughout most alternatives displayed in the EIS, timber harvesting is expected to be used as a dominant method of ecosystem management.
2-55	Public Concern: The Forest Service should explain why Management Prescription 10.A, Sustained-Yield Timber Management, is	Under the “design criteria” for the development of Alternative I, it was originally structured so that the forest ecosystems would

	not included in Alternative I.	be managed, either through restoration or maintenance activities, to provide for the desired forest composition, structure, function and productivity over time. Forest products would be produced from these activities, and it was felt that a prescription with an “emphasis” on producing timber would not be necessary. However, after receiving input from the public during the “rolling” of the alternative, as well as comments during the public comment period, it was decided that there may be situations where the use of Management Prescription 10A would be appropriate. There is an almost infinite combination of elements to consider in the development of alternatives. Alternatives A, D, and F utilize prescriptions 10.A and 10.B to accomplish the goals of the Alternatives. After considerable discussion, the leadership on the CNF decided that the goals established in Alternative I could be accomplished without the use of those prescriptions.
2-57	Public Concern: The Forest Service should modify Alternative I.	There is an almost infinite combination of elements to consider in the development of alternatives. A broad range of acreages has been allocated to prescriptions that preserve and enhance remote and roadless character in the CNF.
2-59	Public Concern: The Forest Service should modify Alternative I.	See response to 2-57.
2-60	Public Concern: The Forest Service should justify the reduction of wilderness recommendations between the current Alternative I and the draft Alternative I released six months ago.	Allocations to prescription 1.B, as well as all prescriptions for Alternative I have varied throughout the revision process. Changes to the allocation are based on public input, and management considerations.
2-62	Public Concern: The Forest Service should modify Management Prescription 7.C in Alternative I to allow the use of two-track motorized vehicles up to 78 inches wide.	Forest-wide standard in Chapter 2 under “Off-Highway Vehicles” states, “OHV use on all roads under FS jurisdiction that are open (ML 2-5) is limited to vehicles and operators that are in compliance with motor vehicle laws of the state. Unlicensed OHV’s are restricted to routes (roads and trails) specifically designated as open to such vehicles.” The need to provide recreation opportunities for unlicensed vehicles such as ATVs as well as jeep type vehicles is addressed Prescription 7.C - Off Highway Vehicle Use Areas. The “Emphasis” statement for 7.C states, “ATVs and motorcyclists will utilize designated routes within prescription area. Larger OHVs such as four-wheel-drive vehicles will use existing, open system roads suitable for high-clearance vehicles.” The LMP Glossary defines ATV as “any motorized, non-highway vehicle 50 inches or less in width...” This response also addresses public concern 5-80.
3-1	Public Concern: The Forest Service should protect forests and the environment.	The LMP addresses 12 common issues that include the wide range of desires, wants, needs, and concerns that have been expressed by the users of the CNF. Often times, meeting one set of needs/concerns is in conflict with meeting other needs/concerns. The challenge is to try to find the appropriate level of management that will best address all these issues. The Record of Decision explains how the Selected Alternative is the alternative that does the best job of trying to meet the public’s demands while protecting the resources. See response to concerns 2-3, 2-4, 2-5, 2-10. The Revised LMP focuses on protection and restoration of the CNF environment, as stated in the description of Alternative I in the “Alternatives Considered in Detail” section in Chapter 2 of the EIS.
3-1.r	To facilitate scenic beauty, recreation, and tourism.	Chapter 1 of the EIS identifies “Aesthetics/Scenery Management” and “Recreation Opportunities/Experiences” as significant issues. These issues were used to develop alternatives for the LMP revision process. These alternatives are described in Chapter 2 under “Alternatives Considered in Detail” and then compared under “Comparison of Alternatives by Issue.” Alternative I provides high quality nature-based recreation opportunities and emphasizes non-motorized settings with natural appearing landscapes.
3-6.	Public Concern: The Forest Service should contact the Virginia Department of Environmental Quality for determination of state permit requirements.	The direction in the revised LMP is in place to ensure that legal obligations of the CNF are met. See specifically the Watershed section of Chapter 2 of the revised LMP, the Prescription 11 section of Chapter 3 of the Revised LMP, and Chapter 5 of the revised LMP, which specifies monitoring to ensure that the LMP direction is having the intended effect.
3-8.	Public Concern: The Forest Service should conduct site-specific analysis and review scientific data.	The LMP establishes a framework for managing a national forest in terms of goals, objectives, standards, management prescription allocations, and monitoring requirements. However, a LMP generally does not make decisions pertaining to site-specific activities. A NEPA-compliant analysis still needs to be accomplished before making any site-specific project decisions. It is at the project level that this site-specific analysis will occur and any new science or new data is considered with respect to the project being proposed.
3-16.	Public Concern: The Forest Service should provide greater protection of soils.	The LMP recognizes the importance of soils and provides descriptions of soil characteristics in the EIS. Standards are developed to provide protection for planned management activities. Soils standards are found in various resource sections of the draft LMP and forest wide standards. Site-specific analysis will be conducted at the project level and further protection provided as needed.
3-19	Public Concern: The Forest Service should prepare quality and detailed soil inventories, baseline conditions, and site-specific analysis and mitigation measures.	CNF EIS provides general soils descriptions. Detailed soil inventories, baseline conditions, site-specific analysis and additional mitigation measures will be developed as needed for projects as they are developed in Environmental Analysis.
3-19.j	To support best management practices and provide evidence that site-specific mitigation measures are effective.	The revised LMP (through forest-wide and management prescription specific direction) recognizes and supports the use of best management practices and standards to protect the soil resource. Monitoring activities needed to determine the effectiveness of BMPs and standards are summarized in Appendix G of the LMP.
3-22	Public Concern: The Forest Service should clearly explain how projected sediment increases can be accurate as continuations of current management practices.	The sediment model estimates erosion/sediment potential from activities that disturb the ground. The estimated sediment trends, by alternative, reflect how many acres of each ground disturbing activity will occur and the associated increase in sediment potential from a static, existing condition. Continuation of current management (Alternative F) is treated in the same way.
3-22.a	Because prescription 11 is not shown in Table 2-1	Coefficients used for erosion rates take into account general conservation practices that are used to reduce erosion potential. Reduction of erosion potential due to RX11 standards is not specifically accounted for in the coefficients. As a result, reported trends in erosion/sediment potential may be high. This trend is present in all alternatives, however.

3-22.b	Because there should be a decrease, or no increase in sediment due to buffers	The sediment model estimates erosion/sediment potential from activities that disturb the ground. The estimated sediment trends, by alternative, reflect how many acres of each ground disturbing activity will occur and the associated increase from a static, existing condition. Riparian corridor/streamside filter zone reduce the potential, but not eliminate any potential for sediment delivery.
3-22.c	Because the conclusions make the science for predicted sediment increase suspect	The sediment model uses is the best science currently available to represent trends in sediment delivery on a large planning scale.
3-30	Public Concern: The Forest Service should modify plan language to better protect soils and water.	In the context of the standards, minimizes is a more appropriate concept than “prevent.” “Prevent” implies an action or outcome will never occur. Minimizes acknowledges the possibility of some level of impact, but at a greatly reduced level or rate.
3-33	Public Concern: The Forest Service should not allow sediment issues to restrict management activities within riparian corridors and the forest.	Management activities including timber harvesting may occur in riparian areas where there is a need to maintain, restore or enhance riparian functions and values and to meet the needs of riparian associated species or for forest health reasons. Riparian corridors are intended to protect multiple ecological values and are not tied solely to sediment issues.
3-33.a	Because such restrictions are not scientifically justified	The importance of protection zones along riparian areas to reduce non-point source pollution, as well as, to protect and enhance other ecological values is well documented in the scientific literature.
3-40	Public Concern: The Forest Service should protect cave and mine resources and any species that inhabit these sites.	CNF Partner agency is endorsing direction found within Prescription 9F.
3-42	Public Concern: The Forest Service should write a cave management plan.	The revised LMP includes caves under the Rare Community Prescription, which provides this habitat a high level of protection wherever it occurs. Management plans for individual caves represents too fine a level of detail for inclusion in the LMP. However, it is important to note that provisions of the Federal Cave Resources Protection apply in addition to LMP direction. Management plans for specific significant caves may be prepared during LMP implementation where needed to meet requirements of this law and the LMP.
3-47	Public Concern: The Forest Service should implement requirements that protect all streams and surface waters within national forest boundaries.	Federal, state and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. The CNF revised LMP protects aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level.
3-49	Public Concern: The Forest Service should allow water diversion only to benefit the viability of aquatic species.	The Multiple Use Sustained Yield Act allows forest resources to be used for other than ecological purposes. As long as aquatic organisms are not being harmed, there is not justification for not allowing water diversions.
3-51	Public Concern: The Forest Service should implement a management plan that avoids and minimizes effects on aquatic resources.	Alternative I, the selected alternative, was designed to “emphasize watershed restoration” and “maintain and restore riparian areas. The direction provided in the LMP for management of riparian corridors ensures that aquatic resources are protected, and improved.
3-51.b	To protect fisheries and crustacean life for study and fishing	The Forestwide and Riparian Standards adequately protect the mentioned waters and all other streams from significant impacts of Forest Service activities. These standards are similar to the ones in the 1986 LMP which have sustained all monitored aquatic species for the 18 years that the plan has been in effect.
3-52	Public Concern: The Forest Service should protect water quality.	Federal, state and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. The CNF revised LMP protects aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level.
3-52.b	Because trout streams suffer from sedimentation	Some trout streams are being impacted by sediment from NFS lands but it has been shown that most of this sediment comes from existing roads. Standards protect streams from impacts of new roads. The CNF is taking steps (relocating and paving roads, putting in diversion dips to move water off the roads surface) to fix problems on existing roads.
3-55	Public Concern: The Forest Service should add language to the forest plan that limits the amount of sediment in streams.	There is sufficient direction in the revised LMP that addresses limiting or minimizing sediment delivery to streams (See Goal 1, 2, 4, 11-1, and 11-3; standard FW-7 for example).
3-55.a	To protect aquatic life	Goal 11-1 and 11-3 adequately describes or intent in regard to protecting aquatic life and habitat from sediment and other impacts.
3-56	Public Concern: The Forest Service should modify sediment yield models to reflect conditions of, and restricted to, national forest lands.	The sediment model is a tool used to examine the relationship between relative sediment yields and activities proposed in each of the forest plan alternatives. This model also estimates cumulative effects. Because streams function as a conduit for transporting sediment, cumulative effects cannot be assessed if the analysis is restricted to NFS lands. Further, NEPA requires the assessment of cumulative effects to include both public and private lands.
3-58	Public Concern: The Forest Service should protect watersheds.	Federal, state and local laws (i.e. NFMA, Clean Water Act) require that aquatic resources, streams and surface waters be protected. The CNF revised LMP protects aquatic resources by identifying streams, their beneficial uses and developing standards, which protect those resources during management activities. Standards are found in the Riparian Prescription and forest wide standards. Further protection will be provided as needed at the project level. Forestwide standards have been developed to provide overall watershed protection during management activities.
3-58.s	To protect water quality and ecosystems.	Watershed concerns are identified in Issue # 4 and are considered in all alternatives of the EIS and in desired conditions, goals, objectives and standards in the revised LMP. Further protection will be provided, as needed, at the project level.
3-59	Public Concern: The Forest Service should protect streams.	Direction in the LMP, in the “Watersheds – Water, Soil, Air, and Aquatic Species” section of Chapter 2, and the “Prescription 11 – Riparian Corridors” section of Chapter 3, ensure that streams on the CNF are protected.

3-61	Public Concern: The Forest Service should specify actions and timelines for conducting watershed assessments and analysis.	Watershed assessments and analysis are excellent tools for identifying priority watersheds, and programming restoration work. Assessments are also useful in land management allocations and in the development of prescriptions. Broad scale watershed analyses were completed by each forest to assess watershed condition and vulnerability. More detailed watershed analysis will be completed as needed prior to project implementation.
3-61.a	To include roads analysis data	Watershed assessments are useful for identifying priority watersheds and programming restoration work. Watershed assessment and roads analysis has been completed at a large, planning scale. Detailed roads analysis data such as stream crossings and their condition is much more appropriate at a project level or smaller watershed scale (6 th or 7 th level).
3-62	Public Concern: The Forest Service should analyze where soils and water quality have been most negatively affected, or are most sensitive, and use that data as a baseline for protecting watersheds.	A broad scale watershed assessment has been completed on the CNF. This assessment identified the condition and vulnerability of 5 th level watersheds. Impaired waters and sensitive soils were two of the factors used in this assessment. The assessment is used to identify priority watersheds and concerns within these large watersheds. Further analysis is conducted when smaller watershed assessments and project level analyses are completed.
3-65	Public Concern: The Forest Service should designate high priority watersheds to receive special protection.	Based on the results of cumulative effects analysis the CNF identified priority watersheds where additional monitoring or detailed study is required. Results of the WHI in the cumulative effects analysis will be used as a guide for future work.
3-65.c	Because there is no accountability for watershed protection.	Forestwide and riparian standards provide direction for watershed protection. The CNF is accountable for meeting this direction. Objectives are planned results or outcomes the CNF seeks to achieve, and accomplishment are monitored over time. The objective referred to has been slightly edited. The result expected is partnership opportunities in impaired 5 th level watersheds.
3-65.d	Because timber harvest receives priority.	Projected harvest volume is part of the SPECTRUM model solution. Timber output results from implementing objectives to establish early successional wildlife habitat. There was no intentional priority given to this objective over others. Objectives are established as "benchmark" outputs from which actual achievements can be compared. Standards, on the other hand, have to be met. Standards have been established throughout the revised LMP to protect watersheds.
3-67	Public Concern: The Forest Service should incorporate direction, goals, objectives, and standards to address a whole watershed approach of aquatic conservation for recommended issues.	The CNF LMP applies the Riparian Prescription along with mitigation for activities occurring in riparian areas to ensure that the riparian habitat and water quality originating on NFS lands are protected and enhanced.
3-68	Public Concern: The Forest Service should establish explicit management categories and prescriptions for riparian areas.	The CNF developed the Riparian Prescription specifically to protect, enhance and restore associated riparian functions and values. The Riparian prescription is found in Chapter 3 of the CNF revised LMP.
3-70	Public Concern: The Forest Service should acknowledge and document the ecology of watersheds.	See response for concern 7-184.
3-72	Public Concern: The Forest Service should specify land allocations, standards, guidelines, and planning processes, as recommended, for aquatic conservation areas.	The CNF participates in recovery plans with the FWS for federally listed species. Standards are specified in the land management plans to protect and conserve all aquatic species.
3-73	Public Concern: The Forest Service should rewrite forest wide goals, objectives, and standards to fulfill requirements of their respective classifications and criteria, and to implement recommendations for watershed health.	Goals, objectives and standards are developed that respond to issues and concerns for the protection, enhancement and restoration of riparian areas, perennial, intermittent and ephemeral streams. Forest wide standards are developed as well as Riparian Corridor specific standards. Goals, objectives and standards were reviewed and are appropriate
3-83	Public Concern: The Forest Service should establish riparian corridor standards that specify provisions to guide timber harvest and the construction, use, and maintenance of roads.	Road and timber harvest standards are specified in the riparian corridor prescription, forest wide standards and referenced in Tennessee BMP requirements. Standards are also stipulated in contract clauses for road construction and timber harvest. The need for additional standards, road stabilization techniques, and use restrictions will be determined at the project level.
3-88	Public Concern: The Forest Service should implement whole-system approaches to watershed management.	The CNF revised LMP with management direction for the protection of scoured ephemeral, intermittent, and perennial streams and lakes, seeps, springs and other wetlands provides a comprehensive approach to watershed management. The need for further watershed protection will be evaluated and prescribed, as needed, during project development.
3-88.a	Because all upstream activities affect downstream catchments	The management direction contained in the CNF revised LMP takes a comprehensive approach to watershed condition and management.
3-89	Public Concern: The Forest Service should specify protection at the watershed scale with corridors that extend to the drainage divide.	Protection is provided in the plan for streams, lakes, aquatic resources wetlands and floodplains (see Riparian Prescription). Riparian Corridor widths were based on research findings, monitoring data and current literature recommendations. Further protection will be considered and prescribed as needed when projects are developed.
3-89.f	Because modifying the prescription is misconduct	Information contained in the draft documents is subject to systematic and deliberate change based on field testing, evaluation of new or previously unknown information and/or the evaluation of public comments.
3-90	Public Concern: The Forest Service should specify requirements to conduct a watershed analysis prior to initiating site-specific project planning, and stipulate the framework for the analysis.	Watershed Analyses are conducted by the CNF as needed and where it is determined that a watershed analysis should be completed to develop a project. Frameworks recommended for the watershed analysis include "Ecosystem Analysis at the Watershed Scale" and " Hydrologic Condition Analysis".
3-91	Public Concern: The Forest Service should conduct a full cumulative effects analysis and discard results and conclusions based on the watershed health index and associated analyses.	The EIS discloses the environmental effects, including cumulative effects of the proposed programmatic alternatives commensurate with the LMP stage of decision making. Forest Plans do not generally make final irreversible or irretrievable decisions. The Forest Service has chosen to address cumulative effects on aquatic species with the watershed condition ranking because it is the most likely source of impacts from management activities, correlates to changes in endemic aquatic species populations, and is the best available science.
3-91.a	Because the underlying analyses are fatally flawed with false assumptions, misinterpretations, and unsupported conclusions.	The purpose of the Watershed Health Index and associated analyses is designed to identify large-scale attributes that may contribute to maintenance of aquatic systems. Further, the relationship between the proportional increase in sediment and endemic fish species is consistent with current scientific thinking related to the dynamic nature of species response to

		disturbance (i.e. the ranges of generalist species will expand as those of specialists contract). It is reasonable to assume that changes in the proportion of endemics accompanies disturbance in the watershed. However, in response to comments the WHI has been modified and cutoffs based on NFS ownership, riparian landuse and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion.
3-91.b	Because more information is needed concerning cumulative effects.	The Watershed Health Index was replaced with the Watershed Condition Ranking (the relationship between locally adapted species and sediment).
3-91.c	Because the watershed health index masks potentially significant effects.	Sediment was used as a surrogate to represent all adverse effects on water quality and the effects on associated beneficial uses.
3-91.d	Because the cumulative effects analysis does not consider potential impacts to water quality and aquatic habitat beyond sediment yields.	1.0 is not the expectation because virtually no streams are composed of 100% endemics. It was never implied in Scott & Helfman (2001) that 0.5 was the point of being 'in balance'. Different regions and drainages support different levels of endemism as indicated by least-disturbed reference conditions. Although data from all southern Appalachian forest were not used to develop the model, the data was stratified by physiographic province and based on species described as highland endemics (those that evolved in high elevation conditions). Therefore, the ecological traits that make the species used in the analysis sensitive to disturbance should be similar to other highland endemics. Nevertheless, fish data from Virginia are currently being analyzed.
3-91.j	Because all cumulative effects analysis rests on the sediment model's estimates.	The sediment model is a consistent, repeatable process that addresses the effects of management activities upon the aquatic environment.
3-91.k	Because the cumulative effects analysis does not consider the effects of increased sediment on mussels and other species.	The relationship between the proportional increase in sediment and endemic fish species is consistent with current scientific thinking related to the dynamic nature of species response to disturbance (i.e. the ranges of generalist species will expand as those of specialists contract). It is reasonable to assume that changes in the proportion of endemics accompanies disturbance in the watershed. The effects of increased sediment on mussels and other species were not analyzed because of the lack of appropriate data.
3-91.l	Because data collection and analysis exhibit malfeasance.	The purpose of the Watershed Health Index and associated analyses was designed to identify large-scale attributes that may contribute to maintenance of aquatic systems. Further, the relationship between the proportional increase in sediment and endemic fish species is consistent with current scientific thinking related to the dynamic nature of species response to disturbance (i.e. the ranges of generalist species will expand as those of specialists contract). It is reasonable to assume that changes in the proportion of endemics accompanies disturbance in the watershed. However, in response to comments the WHI has been modified and cutoffs based on forest service ownership, riparian landuse and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion. Different regions and drainages support different levels of endemism as indicated by least-disturbed reference conditions. Although data from all southern Appalachian forest were not used to develop the model, the data was stratified by physiographic province and based on species described as highland endemics (those that evolved in high elevation conditions). Therefore, the ecological traits that make the species used in the analysis sensitive to disturbance should be similar to other highland endemics. A subsequent model, using data from Virginia, supports this hypothesis.
3-91.q	Because the Watershed Health Index does not provide analysis by management activity and alternative.	The WHI did provide analysis by alternative and included all soil disturbing management activities. However, in response to comments the WHI has been modified and cutoffs based on forest service ownership, riparian landuse and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion.
3-91.s	Because the watershed health index is not valid.	The WHI (renamed Watershed Condition Ranking, WCR) includes past, present, and future logging, oil and gas development, and road development. Sedimentation was modeled by the activities proposed in each alternative. If the change in sediment rates in any alternative fell within the range of tolerance determined by the species-sediment relationship, the effect of the alternative did not change. The purpose of the Watershed Health Index and associated analyses was designed to identify large-scale attributes that may contribute to maintenance of aquatic systems. Further, the relationship between the proportional increase in sediment and endemic fish species is consistent with current scientific thinking related to the dynamic nature of species response to disturbance (i.e. the ranges of generalist species will expand as those of specialists contract). It is reasonable to assume that changes in the proportion of endemics accompanies disturbance in the watershed. However, in response to comments the WHI has been modified and cutoffs based on forest service ownership, riparian landuse and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion.
3-93.	The Forest Service should explain why specific waterways are ranked as below average as part of the watershed health index study.	Because of the relationship between environmental stressors and locally adapted fish species. However, in response to comments the WHI has been modified and cutoffs based on forest service ownership, riparian landuse and riparian road density have been removed. The process is referred to as the Watershed Condition Ranking to reduce confusion.
3-93.a	Because the strategy for viability analysis is designed to get around Sierra Club V. Martin.	The strategy for viability analysis was designed to identify large-scale attributes that may contribute to maintenance of aquatic systems.
3-94	Public Concern: The Forest Service should demonstrate regional leadership in implementing aquatic conservation and best management practices.	See response for concern 3-147.
3-94.b	Because improved aquatic conditions will require changes in land practices across the region	The CNF will implement best management practices and management direction that will continue to maintain and restore healthy watershed and riparian condition on national forest lands. Where possible, the CNF will work collaboratively across

		ownership boundaries with interested stakeholders to improve watershed condition in a comprehensive approach.
3-96	Public Concern: The Forest Service should implement recommended actions to address aquatic conservation needs of the region.	The CNF participates in recovery plans with the FWS for federally listed species. Standards are specified in the land management plans to protect and conserve all aquatic species.
3-97	Public Concern: The Forest Service should conduct cooperative efforts to improve watershed condition.	Some changes have been made to the final LMP to address this concern. See Objective 1.02, 1.03 and 1.05. These address cooperative efforts.
3-99	Public Concern: The Forest Service should, in the forest plan alternatives, address watershed management.	We agree. Watershed management is a dominant theme throughout the CNF revised LMP and the EIS. It is one of the significant issues addressed in the LMP and EIS (See Chapter 1). It is also addressed in Chapter 2 (Alternatives) of the FEIS and in Chapters 2 and 3 of the revised LMP, for example.
3-99.a	To protect ecological functions and support intended beneficial uses of water	These two important considerations of watershed management are recurring themes throughout the CNF revised LMP and EIS. Issue # 4 described in Chapter 1 of the EIS is directly related to these ideas.
3-102	Public Concern: The Forest Service should manage watersheds under 9.A.3 or 9.A.4, as recommended, and follow regional guidance to develop management standards.	The range of alternatives displayed in Chapter 2 of the EIS demonstrates that the CNF considered the use of prescriptions 9A1, 9.A.2, 9.A.3 and 9.A.4 in the analysis in response to issues. Water quality, protection and riparian condition are protected and enhanced in the LMP through the use of the mitigation and the riparian prescription.
3-106	Public Concern: The Forest Service should protect the Jacks River system.	WRONG CODE
3-107	Public Concern: The Forest Service should protect the upper Bald River.	This upper Bald River watershed was allocated to the 1.B. (Recommended Wilderness Study Areas) and 12.B (Remote Backcountry Recreation-Nonmotorized) management prescriptions. These allocations will ensure the protection of the watershed.
3-107.a	Because the tributaries contain habitat for brook trout and other species	Most of the Bald River area mentioned is proposed for protection. The prescription is 1B – Proposed Wilderness. The portion near Henderson Branch is proposed for 7B – Scenic Corridor and Sensitive Viewshed that, along with the Riparian and Forest-Wide standards, will adequately protect the brook trout streams.
3-112	Public Concern: The Forest Service should specify that the Conasauga River and Hiwassee River are listed as state scenic rivers.	The following reference has been added to Prescription 2.B.3 in the LMP, “Portions of the Conasauga and Hiwassee Rivers are classified as State Scenic Rivers under “The Tennessee Scenic Rivers Act of 1968” and managed cooperatively with the state. Reference to “The Tennessee Scenic Rivers Act” has been added to Appendix A of the LMP.
3-112.a	Because state designation may affect river management	See response for 3-112.
3-113.	Public Concern: The Forest Service should restore the Hiwassee river.	The watershed and water quality protection direction found in the “watershed” section of Chapter 2, Prescription 11 and section of Chapter 3 of the revised LMP strengthen the assurance that water that has its source on the CNF is not lowering the quality of the water of the Hiwassee River that flows onto the CNF. Monitoring is specified on Chapter 5 of the revised LMP that enable the CNF staff to ascertain that the direction is having the intended affect.
3-114.	Public Concern: The Forest Service should include objectives, as recommended, for the Conasauga, Hiwassee, Nolichucky, and Etowah Rivers and Citico Creek.	A primary Forestwide Goal in Chapter 2 to of the revised plan is to restore and maintain forest communities to those plant communities predicted as most likely to occur based on the ecological potential of the site. This potential natural vegetation is will be based on factors such as what was previously on the site and the International Classification of Ecological Communities: Terrestrial Vegetation of the US, Cherokee National Forest Final Report of June 2002, prepared by NatureServe.
3-116	Public Concern: The Forest Service should manage the Chattooga watershed with identical prescriptions across forests, and issue identical maps that are easy to interpret.	WRONG CODE
3-118	Public Concern: The Forest Service should expand prescription 12.A to include the entire Chattooga River watershed.	WRONG CODE
3-127	Public Concern: The Forest Service should better protect riparian areas.	Protection is provided in the LMP for streams, lakes, aquatic resources wetlands and floodplains (see Riparian Prescription). Specific standards are prescribed in the Riparian Prescription and forestwide standards.
3-130	Public Concern: The Forest Service should use the watershed assessment and habitat reports to guide fish and riparian management.	Information contained in the FWRBE reports was extensively used to develop riparian and aquatic management direction. A broad scale watershed assessment was completed and utilized on a limited basis to define watershed vulnerabilities and existing condition. As needed, more detailed watershed assessments will be completed and utilized to define project level management direction.
3-132	Public Concern: The Forest Service should not allow camping, toilets, and animal grazing within riparian areas.	Forestwide direction and the Riparian Prescription prohibit feeding and watering troughs as well as salt and mineral blocks inside the channeled ephemeral zone. Tethering and corralling of livestock is not allowed within 50 feet of streams or lakes. Existing corral sites will be maintained to limit impacts to water quality and riparian habitat.
3-133	Public Concern: The Forest Service should not allow water diversion unless it benefits the viability of aquatic species.	A goal and revised objective has been added to further address instream flow. The standard (FW-1) has been rewritten to be broader in scope and include other criteria for instream flow need.
3-134	Public Concern: The Forest Service should adopt the original interim standards that protect streams.	There is sound scientific basis to make changes to the interim direction referred to. Riparian area width on the CNF does not increase with increasing slope. The need for a filter zone to protect water quality does need to expand with increasing slope. Standards contained in the revised LMP reflect the need for a core riparian corridor and a streamside filter zone that expands with increasing slope. Together these compose the streamside management zone.
3-135.	Public Concern: The Forest Service should implement FW-3.	FW-3 in the draft LMP is modified in the revised LMP to simplify the implementation of the Direction. The effect on water quality is not intended to change. The monitoring chapter (Chapter 5) establishes procedures to determine that the desired effects are produced.
3-137	Public Concern: The Forest Service should analyze the benefits of managing ephemeral streams under the riparian prescription as compared to managing the streams for other resources.	Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with

	as compared to managing the streams for other resources.	streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level. Standards for managing ephemeral streams are included in forest wide standards.
3-138	Public Concern: The Forest Service should include ephemeral streams in the definition of the riparian corridor and set management standards.	Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level. Standards for managing ephemeral streams are included in forest wide standards.
3-139	Public Concern: The Forest Service should adopt the original definition of riparian corridor.	Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level. Standards for managing ephemeral streams are included in forest wide standards.
3-142	Public Concern: The Forest Service should specify standards for protecting streamside management zones and fingers.	The Riparian Prescription standards protect streams and aquatic resources. Riparian corridors also capture much of the area that would be protected with SMZs. Where additional protection is needed, forest will implement SMZs (i.e. for steep slopes). Furthermore, State BMPs will be followed which specify SMZs for silvicultural activities.
3-143	Public Concern: The Forest Service should expand riparian areas, riparian corridors, and buffer zones.	Riparian areas are determined on the basis of physical and biological characteristics (vegetation, soils, and hydrology). Riparian corridors (fixed buffers) are established to encompass the Riparian area. Where fixed widths do not capture the Riparian area, distances are adjusted. SMZs in forest wide standards are employed as needed at the project level where additional protection is necessary.
3-143.k	To 50 feet on each side of the channel.	The default for streamside management zones (riparian corridors/filter zones) along intermittent streams is 50 feet and for perennial streams and lakes is 100 feet. The zone increases with increasing slope. A streamside management zone of 25 feet on each side of scoured ephemeral streams will be maintained. Review of the scientific literature supports the use of these widths to protect water quality and aquatic resources.
3-144	Public Concern: The Forest Service should reduce the widths of riparian zones.	The Riparian Prescription establishes a level of protection- through fixed riparian corridor widths- to maintain, restore and enhance riparian functions and values. Riparian corridor widths can be reduced when it is deemed necessary to manage for Riparian Associated values.
3-144.a	Because plan widths are not corroborated by research findings.	There is wide variation of findings in the scientific literature related to the proper width of riparian buffer/streamside zones needed to protect water quality, aquatic habitat and provide for the other ecological needs associated with riparian areas. The widths contained in the revised LMP are believed to meet a general consensus of opinion related to riparian protection needs.
3-144.b	Because prior lenient restrictions resulted in no significant environmental effects.	It is agreed that prior riparian guidelines resulted in the protection of water quality and aquatic habitat. It is now believed, however, and supported by recent scientific study that riparian areas support other values in addition to water quality and aquatic habitat protection. The recruitment of large woody debris, bird and amphibian habitat needs and the maintenance of microclimate niches are some of the values that have led to changes in riparian direction compared to the 1986 Plan.
3-144.f	Because placing debris is more effective than natural debris.	Large woody debris (LWD) has been shown to be the most limiting ecological factor for Southern Appalachian streams (USFS Research). While "installing" LWD is a common practice on this Forest, it is only an attempt to replace what was removed many years ago prior to Forest Service ownership. The small (>30" DBH) logs that are available today for this work are not adequate to replace the large logs that historically were present. These large logs functioned as "dams" which stored the leaves and other organic materials to decay on site and be released as nutrients to the stream over a long period of time. Without these "dams" most of the leaves drift through the stream system and wind up in the large reservoirs where they contribute to the low oxygen conditions.
3-146	Public Concern: The Forest Service should explain the rationale for eliminating ephemeral streams from the riparian corridor, removing protection, and weakening prescriptions to protect and restore riparian ecosystems.	Subsequent to issuance of Riparian Management direction, ephemeral streams were removed from the riparian corridor description because ephemeral streams do not have the physical or biological characteristics that qualify as "Riparian". Protection for ephemeral streams was not removed but rather moved to forest-wide standards. The changes made in the Riparian Prescription have not weakened protection of the riparian area but allows for greater management options for riparian associated species.
3-147	Public Concern: The Forest Service should implement aquatic conservation and management direction.	The CNF participates in recovery plans with the FWS for federally listed species. Standards are specified in the land management plans to protect and conserve all aquatic species.
3-148	Public Concern: The Forest Service should designate secondary riparian zone buffers beyond the primary riparian zones.	The Riparian Prescription was developed to provide protection, enhance and restore riparian functions and values. Minimum buffer widths and standards were developed to protect streams, lakes, wetlands and floodplains. Additional SMZs are included beyond the Riparian Corridor where needed to provide additional protection (i.e. steep slopes or highly erodible soils).
3-149	Public Concern: The Forest Service should define the ephemeral zone as the overall drainage areas of streams, and protect the entire area.	Ephemeral streams were included in the original definition of Riparian Corridors because of their connectivity to stream networks. Ephemeral streams however do not have riparian characteristics and therefore are managed and protected with streamside management zones. Because of their characteristics (i.e. periodic response to stream flow and uncertain identification criteria) specific guidance for management of ephemeral streams is appropriately developed at the forest level. Standards for managing ephemeral streams are included in forest wide standards.
3-157	Public Concern: The Forest Service should restore degraded riparian ecosystems.	We agree that degraded riparian ecosystems should be restored where it is feasible to do so. Significant issue # 4 addresses

		this concern as does management direction contained in Chapters 2, 3, and 4 of the Forest Plan.
3-160	Public Concern: The Forest Service should restrict basal area removal within riparian areas to 15-20 square feet.	There is little or no riparian area associated with ephemeral streams on the CNF. Our primary concern with management of ephemeral stream areas is for water quality protection. A streamside management zone of 25 feet on either side of scoured ephemerals in which mineral soil disturbance is limited will provide adequate water quality protection.
3-168	Public Concern: The Forest Service should not designate riparian corridors as unsuitable for timber harvest, but as suitable.	Timber harvesting activities may occur in riparian corridors when they are needed to maintain, restore or enhance riparian functions and values and to meet the needs of riparian associated species. 36 CFR 219.27(c)(1) states that harvesting activities can occur on lands classified as not suited for timber production when such activities are necessary to protect other multiple-use values or are needed to meet forest plan objectives. Riparian corridors were designated as not suitable for timber production because it was determined that managing these lands for the purposes of having "regulated crops of trees ... for industrial or commercial use" (36 CFR 219.3) was inconsistent with meeting the desired conditions of the riparian corridor.
3-168.e	Because timber harvest can be beneficial if conducted properly.	Vegetation management activities, including timber harvesting, may take place in the riparian corridor to maintain, restore, and/or enhance the diversity and complexity of native vegetation, rehabilitate both natural and human-caused disturbances, provide habitat improvement for TES or riparian-dependent species, provide for visitor safety, or to accommodate appropriate recreational uses. Refer to Chapter 3, management prescription 11 for details concerning vegetation management practices for riparian areas.
3-168.g	Because funding is not available for fisheries and wildlife without a timber management program.	Funding levels for wildlife and fisheries improvements varies from year to year, however funding is available is available for this work outside of collections from timber harvesting.
3-168.i	To allow limited timber harvest	As stated earlier, timber harvest activities may occur in riparian corridors when they are needed to maintain, restore or enhance riparian functions and values and to meet the needs of riparian associated species. A designation of "unsuitable" does not preclude harvest activity. If, for example, early successional habitat is needed for a riparian associated species, project level analysis should identify this need and act accordingly.
3-170	Public Concern: The Forest Service should not require retention of all overstory trees within riparian corridors.	Vegetation management activities, including timber harvesting, may take place in the riparian corridor to maintain, restore, and/or enhance the diversity and complexity of native vegetation, rehabilitate both natural and human-caused disturbances, provide habitat improvement for TES or riparian-dependent species, provide for visitor safety, or to accommodate appropriate recreational uses. Refer to Chapter 3, management prescription 11 for details concerning vegetation management practices for riparian areas.
3-170.a	Because early successional habitat in riparian areas is critical for many species.	This was addressed in Prescription 11, which is permissive of habitat improvements for riparian-dependent species.
3-179	Public Concern: The Forest Service should clearly define 'riparian area' and 'ephemeral stream' by specifying how much water is required and how long water must be present.	Riparian area and 'ephemeral stream' are defined in the glossary. Ephemeral streams are defined by short duration storm flows that occur as a direct result of storm precipitation. Actual flow amounts for ephemeral streams cannot be quantified or established.
3-184	Public Concern: The Forest Service should provide standards and explanations regarding the construction of crossings.	Technical standards for the construction of stream crossings are contained in road design manuals. The revised LMP is not the appropriate document to display this technical type of information. A discussion of the effects of roads and road crossings can be found in Chapter 3 of the EIS. Several standards are contained in the LMP that relate to road crossings (FW-4, FW-5, FW-7, FW-11, FW-119, FW-120, and FW-121).
3-193	Public Concern: The Forest Service should restrict all ground disturbing activities and motor vehicle use in channeled ephemeral streams.	Except for designated crossings and emergency situations (wildfire), ground disturbing activities and vehicles will be prohibited in the ephemeral channel itself. A 25-foot streamside filter zone will be used along both sides of scoured ephemeral channels to protect water quality. Ground disturbing activity such as roads, skid trails, log landings and other disturbances of this type would normally not occur in this zone (designated crossings may be required). This standard will protect water quality and the integrity of the ephemeral channels.
3-200.	Public Concern: The Forest Service should analyze alternatives for several management strategies within riparian areas.	Two approaches to riparian management are presented in the EIS, Alternative F is the current management as directed in the 1986 LMP. The other alternatives are essentially identical. Alternative C, which isn't considered in detail, has less activity planned that would affect riparian corridors than other alternatives. Effects of disturbance in riparian areas are mentioned in the "forest health" section of Chapter 3 in the EIS.
3-205	Public Concern: The Forest Service should specify objectives and standards to actively manage for hard mast of oak and hickory early successional habitat within riparian areas.	Comments were split on the desirability of using active vegetation management within riparian areas for the benefit of wildlife. Some commenters want more specific direction for managing these highly productive areas for oak mast production and early-successional habitats. Others feel these areas should be used to emphasize old growth restoration and protection of aquatic species and water quality. The revised LMP attempts to accomplish both. The CNF recognizes the importance and value of riparian areas by creating a separate prescription for riparian corridors. Desired conditions within this prescription emphasize late-successional forests, and many standards are included to ensure maintenance of water quality. These qualities are of primary importance. However, this prescription does not rule out active management, when it can be conducted in ways compatible with maintaining or enhancing riparian resources. The LMP has no specific objective for creating early successional habitat in the riparian corridor. Vegetation management projects that enhance mast production or create early successional habitat may be proposed for riparian areas during LMP implementation. Monitoring will track the acreage and condition of riparian corridors, including levels of vegetation management activities implemented.
3-210	Public Concern: The Forest Service should analyze areas set-aside in riparian zones, and provide reasoning to justify listing land allocations in 'no management' riparian zones.	Please see the response to concerns 3-33, 3-144 and 3-168.
3-210.a	Because the set-aside riparian areas appear to be based on arbitrary decisions	The process record contains a process record that documents the development of a riparian corridor acreage estimate. Also

		please see the response to concern 3-168.
3-226	Public Concern: The Forest Service should develop species management plans to protect all species.	A comprehensive list of species with potential viability concerns was developed regionally by specialists from the five National Forests undergoing LMP revision. This list was used as the foundation for the viability analysis that can be found in Section 15.0 of the DEIS. The viability analysis outlines the measures that are in place within the LMP to ensure the continued viability of species of concern on the CNF.
3-228	Public Concern: The Forest Service should provide fish and wildlife areas.	There are various prescriptions allocated in Alternative I that specifically benefit wildlife and fish. Prescription 11. (126,000 acres) specifically protects water quality and riparian values, including sport fisheries. Prescription 7.E.2 (96,955 acres) is a dispersed recreation prescription that is suitable for timber management. Timber management would benefit game species. Also, Prescription 8.C (94,968 acres) is allocated to benefit black bear, but will benefit all species that thrive on little disturbance.
3-235	Public Concern: The Forest Service should create an inventory of biodiversity and maintain the data within geographic information systems (GIS), and strengthen relationships with the Heritage Program Network.	The CNF has a current partnership with TDEC, Division of Natural Heritage, which involves exchange of GIS data for rare species and rare communities, as well as recovery and enhancement of rare species.
3-246.	Public Concern: The Forest Service should modify Goal 63 to emphasize wildlife viewing and nature study.	The language of Goal 63 (Goal 9.F-2) in Chapter 3 of the revised LMP sufficiently address the emphasis of Prescription 4.K
3-246A	Public Concern: The Forest Service should analyze effects of fragmentation within the Draft Environmental Impact Statement.	Fragmentation is a multi-faceted issue. It may affect a variety of species at a variety of scales in a variety of ways. It is a broad umbrella concept that includes a great diversity of potential cause-and-effect relationships. To effectively deal with this issue in planning, it is necessary to be specific about what fragmentation effects are of concern. Most comments related to fragmentation are stated in broad terms that are therefore difficult to address. The EIS includes analysis of effects of fragmentation on productivity of forest interior birds [See section 8.4.0 and 13.0 of the EIS]. This specific fragmentation issue is addressed because it is the most high-profile and well-documented aspect of fragmentation effects on species populations. Methodology used in this analysis represents state-of-the-science on this issue, as documented by literature cited in the EIS. Additional support for this approach is found in a new book on bird conservation by Faaborg (see Chapter 6 of Saving Migrant Birds: Developing Strategies for the Future, published in 2002 by University of Texas Press, Austin). These sources conclude that the scale and focus of analysis used in the EIS (percent forest cover on 75,000 acre landscapes) is the most appropriate approach for assessing fragmentation effects on bird productivity. No other specific fragmentation effects have been raised, internally or externally, that are significant and well-documented enough to warrant additional analysis.
3-248	Public Concern: The Forest Service should propose better wildlife management in the alternatives.	This comment was addressed, in part, by a LMP forestwide objective for high elevation early successional habitat. The R8 FWRBE template followed by the CNF did not specify that an acreage target for general early successional habitat be established. The comment was also addressed under range of alternatives, EIS, Chapter 3 Section 8.0 Successional Habitats. This section displays that a range of early successional habitat levels was considered through the NEPA process.
3-249	Public Concern: The Forest Service should specify prescriptions for wildlife management enhancements.	See Public Concern 3-248.
3-250	Public Concern: The Forest Service should manage wildlife habitats based on specific objectives.	See response to concern 3-248.
3-254	Public Concern: The Forest Service should manage habitat for interior species instead of game species.	The is addressed under range of alternatives, EIS, Chapter 3 Section 8.4.0 Forest Interior Birds. This section displays that a range of interior habitat levels was considered through the NEPA process. National Forests are directed by the NFMA to provide for viability of all native species.
3-256	Public Concern: The Forest Service should manage forests to return wildlife to a natural state with biodiversity.	Many commenters expressed a desire to see national forests managed for maintenance and restoration of “natural conditions” to support healthy ecosystems, clean water, and abundant wildlife, as opposed to an emphasis on resource extraction. The revised LMP is in line with these priorities. Within the southern Appalachian region, vegetation management will be driven by the need to create desired ecological conditions, not to meet resource extraction goals. The LMP clearly focuses on the ecological conditions left on the ground, not on resources removed. Although timber production emphasis prescriptions were defined during planning, none have been included under the preferred alternative. All prescriptions used emphasize ecological restoration, recreation, or special area protection. This emphasis does not mean that there will be no commercial timber sales implemented under the revised plan. Timber sales are one of the most important and efficient tools we have for creating desired conditions on the ground. To use this tool effectively, in most cases we designate individually which trees are to be cut and which are to be retained, and carefully administer the sale to ensure disturbance to soil, water, and remaining trees is within specified limits. This approach is not only effective, it is efficient: by selling cut trees, we generate revenue rather than paying for the service. An added benefit is that sold material is used and generates economic activity within surrounding communities. However, to repeat, any proposed timber sales must make sense in terms of the on-the-ground condition created as a result.
3-261	Public Concern: The Forest Service should manage beaver ponds.	Standard RX9F-18 allows removal of beaver and their dams to protect trout fisheries.
3-274	Public Concern: The Forest Service should address fisheries management and provide prescriptions, standards, and requirements for monitoring.	Fisheries management is incorporated into desired future condition and standards in the land management plans. Monitoring questions can be found in Chapter 5 of the land management plans. Details of proposed monitoring can be found in Appendix G of the plans.
3-292	Public Concern: The Forest Service should consider each proposed threatened and endangered specie individually.	Please see discussion in EIS Chapter 3 Section 11.0 Threatened and Endangered Species
3-296	Public Concern: The Forest Service should protect wildlife and old growth forests.	Please see discussion in EIS Chapter 3, Section 8.5.0. .
3-298	Public Concern: The Forest Service should manage forests in large wilderness tracts for high quality wildlife habitat.	The EIS Chapter 3 Section 12.0 includes a section for black bear that discusses habitat remoteness, as it varies by alternative.

3-300	Public Concern: The Forest Service should specify details regarding the provision of large, contiguous, forested, and remote areas for wildlife.	By its nature, NFS land represents some of the largest blocks of contiguous forestland left on the landscape. For most species, the relatively small scale of disturbance imposed by national forest management does not significantly affect the value of these lands for species needing large blocks of forest (for example, see analysis for interior forest birds [EIS sections 8.4 and 13.0]). However, some species do require remoteness and lack of frequent disturbance from human presence. On the CNF, remote areas are provided by several prescriptions, including 1.A, 1.B, 8.C, 12.A and 12.B. See EIS section 12.4.
3-314	Public Concern: The Forest Service should better protect black bear habitat.	Monitoring information indicates that black bears are relatively abundant and their populations are stable or increasing. Effects of EIS alternatives are analyzed in section 12.4. This analysis indicates that black bears and their habitat will continue to be well provided under the preferred alternative.
3-316	Public Concern: The Forest Service should state whether black bear habitat is suitable for timber harvest.	The table in Appendix F, LMP lists Black Bear Habitat as appropriate for timber production.
3-320	Public Concern: The Forest Service should implement goals and management, as recommended, for managing forests for black bear.	The CNF has this document in the process records and have incorporated these guidelines, where possible, into the LMP. Prescription 8C (Black Bear Management) is applied where possible to state-designated bear reserves. This prescription allows active vegetation management to support soft mast production, but maintains a 125-year rotation to provide adequate den tree recruitment and hard mast production. Mast is also discussed in the EIS, Chapter 3, Section 6.4.0 Oak and Oak-Pine Forests; Section 8.0 Successional Habitats. A Chapter 3 EIS contains a section on black bear. The TN Wildlife Resources Commission regulates populations of black bear by setting appropriate hunting season dates and bag limits Forestwide objectives and prescription 8C standards establish recreation, law-enforcement, and public affairs practices that minimize potentially dangerous human-bear interactions. Forestwide standards and prescription 8C standards establish caps on open road miles and motorized trail miles.
3-321	Public Concern: The Forest Service should implement management actions, as recommended, to maintain quality bear habitat.	Programs will be adjusted based on current, site-specific information. The CNF allocated the Black Bear Management prescription (8C) where possible to state-designated bear reserves. See EIS, Chapter 3, Section 8.5.0, Old Growth. See LMP Forestwide objective for high elevation early successional habitat was modified in response to this comment. The targeted acreage for this habitat is 1000 acres. See response for concern 3-320. EIS, Chapter 3, Section 9.2.0, Snags, Dens and Downed Wood See Also Response to concern 7-435. All of these methods will be permitted in the new LMP, and will be selected based on site-specific needs and decision-making processes. See Response to concern 7-116. The LMP specifies group selection rather than single-tree selection, as a preferred regeneration method. Quantified forestwide objectives for prescribed burning have been established for each appropriate ecological community type; forestwide objectives for fuel reduction prescribed burning have been set for 19,000 to 60,000 acres per year. See EIS, Chapter 3, Section 9.2.0, Snags, Dens and Downed Wood The CNF LMP does not establish pine monocultures. See Response to Concern 7-91, emphasis on naturally-occurring plant communities.
3-322	Public Concern: The Forest Service should implement prescription 8.C.	Prescription 8C is implemented under Alternative I.
3-323	Public Concern: The Forest Service should only set aside 4 percent of black bear habitat as open space and 0-10 year age forest.	The TWRA endorses the target of 4-8% in the 0-10 year age class for Prescription 8C. A large acreage of bear habitat (state-designated bear reserves) falls within designated wilderness or roadless areas, where only naturally-occurring small gaps will be found. The range of 0-8% in the 0-10 year age class across all bear habitat is expected to provide a good balance of young forest and old forest.
3-331	Public Concern: The Forest Service should provide prescriptions for grouse management, and explanations for 8.E.1 under Alternative I.	Inclusion of Prescription 8.E.1 was considered for Alternative I. Examination by local managers revealed that due to other resource conflicts (scenery, steepness of slope, relative predominance of young forest due to prior management), Prescription 8.E.1 could not be implemented. The CNF did consider inclusion of this prescription in other alternatives (EIS, Chapter 3, Demand Species, Ruffed Grouse).
3-332	Public Concern: The Forest Service should add 10-15,000 acres in prescription 8.E.1. ruffed grouse habitat.	Inclusion of Prescription 8.E.1 was considered for Alternative I. Examination by local managers revealed that due to other resource conflicts (scenery, steepness of slope, abundance of rare species, relative predominance of young forest due to prior management), Prescription 8.E.1 could not be implemented. The CNF considered inclusion of this prescription in other alternatives (EIS, Chapter 3, Demand Species, Ruffed Grouse, Section 12.3).
3-333	Public Concern: The Forest Service should provide more appropriate references on grouse habitat than citations of Haney.	The Chapter 3, Section 12.3 cited many different literature references in addition to Haney. The CNF used the FWRBE template for this section narrative, which was endorsed by our Regional Office in Atlanta.
3-334	Public Concern: The Forest Service should explain why the Cherokee National Forest is eliminating grouse management areas.	Although the Alternative I does not include Prescription 8.E.1, many other prescription allocations of Alternative I will provide suitable grouse habitat. These are discussed in the EIS, Chapter 3, Sections 8.1 and 8.2, Successional Forested Habitats and High Elevation Early Successional Habitats. Inclusion of Prescription 8.E.1 was considered for Alternative I. Examination by local managers revealed that due to other resource conflicts (scenery, steepness of slope, relative predominance of young

		forest due to prior management), Prescription 8E1 could not be implemented. The CNF considered inclusion of this prescription in other alternatives (EIS, Chapter 3, Demand Species, Ruffed Grouse Section 12.3).
3-343	Public Concern: The Forest Service should implement stronger avian monitoring, habitat restoration, objectives, and active management.	<p>In order to comply with the provisions of Executive Order 13186, a team of biologists from each of the five southern Appalachian revision forests (as well as the Daniel Boone National Forest) worked closely with the Migratory Bird Office of the FWS to incorporate bird conservation measures in the revised plan. Cooperation involved reviewing relevant Partners in Flight Bird Conservation Plans and meeting with FWS personnel on multiple occasions to develop and revise recommended management strategies. Management strategies that have been incorporated into the revised plan include objectives and standards for restoration and maintenance of key habitat conditions, such as high-elevation early-successional habitat, spruce-fir forests, mature forest with diverse canopy structure, early successional forest, mature riparian forest, and open pine and oak woodlands, savannas, and grasslands. In fact, much of the vegetation management directed at major forest community types in the revised plan is driven by bird conservation needs.</p> <p>Following release of draft LMP and EISs, we met again with FWS personnel to review and discussed revised LMPs during the public comment period. Based on this review, the FWS submitted comments to individual forest staffs, in some cases leading to further modifications of revised plans. The objective for high elevation early successional habitat is 1000 acres, and the objective for spruce-fir forest restoration is 100 acres.</p>
3-350	Public Concern: The Forest Service should conduct habitat restoration to increase herbaceous cover.	See response to concern 3-343.
3-350.a	To promote viability of the golden-winged warbler.	<p>In response to this comment, the targeted acreage for creation and maintenance of high elevation early successional habitat was increased to 1000 acres (forestwide objective).</p> <p>Canebrakes are protected under the Prescription 9F, Rare Communities. Natural and human-generated canopy gaps will be located throughout the CNF under Alternative I.</p> <p>A forestwide objective addresses purpose and need for generation of canopy gaps. Forestwide objectives and standards address prohibitions on use of invasive exotic species, and place emphasis on management of these species. For discussions on forest interior, early successional forest and riparian habitats, see EIS Chapter 3, Sections 8.0, 8.4.0, and 9.1.0. Forestwide standards and objectives will regulate the maintenance of these habitats.</p>
3-351	Public Concern: The Forest Service should conduct annual bird monitoring.	The CNF continues to monitor bird populations annually through using the point count method, Breeding Bird Survey, Breeding Bird Census and migrant bird banding stations. See LMP, Appendix G, Summary of Monitoring Task Sheets.
3-353	Public Concern: The Forest Service should correct data on golden-winged warblers.	The data are not available on the referenced website in October 2003, and the webmaster indicated the data would not be available until after the FEIS was completed."
3-356	Public Concern: The Forest Service should modify plan objectives.	These acreages were selected as objectives that could be reasonably accomplished based on projected funding levels.
3-357	Public Concern: The Forest Service should write prescriptions for the cerulean warbler.	<p>Although some prescriptions were written with a focus on an individual species, a species need not have its own prescription to result in adequate habitat. All prescriptions (including those emphasizing other resources) will provide habitat for a suite of species. The mature mesic deciduous forest preferred by cerulean warbler will be abundantly supplied by many of the prescriptions allocated in the revised LMP including 1.A, 1.B, 12.A, 12.B, 4.A, 4.K, and others. Analysis indicates these forests will remain abundant under the preferred alternative. In addition, forest-wide objectives for the creation of canopy gaps within these forests are expected to improve habitat conditions for this species.</p> <p>Some comments cite an early draft of recommendations of the FWRBE Team (Biologists Team) regarding establishment of experimental areas for cerulean warbler habitat improvement treatments and standards for project-level survey of suitable habitat for cerulean warbler breeding territories. They request that these recommendations be included in the revised LMP. The document cited in these comments is an early draft of recommendations; these recommendations were not in the last version provided by the FWRBE Team to Forest Interdisciplinary Teams. These recommendations were removed by the FWRBE Team based on further discussions of conservation and planning needs. In the case of experimental habitat improvement areas, this recommendation was removed after further coordination with the Migratory Bird Office of the FWS. This coordination led to the conclusion that there is enough evidence of the benefits to a wide variety of mature forest bird species from canopy gap treatments that a very cautious application of these treatments is not warranted. In the case of project level surveys, the FWRBE Team removed this recommendations after discussion with Forest Interdisciplinary Teams regarding issues of consistency raised by singling out one species for project-level inventory and not others. We also discussed whether project-level inventory questions are appropriately dealt with at the strategic level of forest planning. Based on these discussions, we decided to deal with this and other project inventory issues as part of plan implementation. (Please also see response to concern 3-542.) In its place, we have specifically identified cerulean warbler as a species targeted for forest-wide population monitoring (see Monitoring Summary Table, Plan Appendix G).</p> <p>Some commenters contend that analysis inadequately supports the conclusion that cerulean warblers and hooded warblers would benefit from canopy gap treatments. Evidence of cerulean warbler association with canopy heterogeneity has grown in recent years, and thus is most strongly reflected in recent literature. In addition to literature already cited in the EIS, the Cerulean Warbler Status Assessment (Hamel 2000) summarizes knowledge of cerulean warbler habitat associations and supports the position that canopy gap management may benefit the species. Hooded warbler's association with canopy gaps and dense patches of understory in mature forests is more widely documented; current knowledge is summarized on NatureServe Explorer (http://www.natureserve.org/explorer/), and in the hooded warbler species account in BBIRD's Management Handbook, available to Forest Service personnel at http://pica.wru.umd.edu/bbird/default.htm.</p>

		Other comments suggest that analysis has ignored the adverse effects on late-successional species (such as the cerulean warbler) caused by creating early-successional habitats. It is axiomatic that actions taken on a given site to improve habitat for one set of species will make habitat less suitable for another set of species. Our analysis focuses on programmatic or overall effects to the mix of habitats available across the landscape as a result of plan implementation. This analysis shows that the amount of mature mesic deciduous forest will remain stable [or increase] if the preferred alternative is implemented over the next 50 years. It is possible for this result to occur even while early-successional habitats are created because of the large proportion of this mesic deciduous forest allocated to low disturbance prescriptions, the aging of currently young forest of this type, and the creation of early-successional habitats from other forest types. Forestwide Objective 12.02 (LMP) establishes a broad objective for achieving cerulean habitat restoration in up to 5% of mid- and late-successional mesic deciduous forest. Specific design of management activities to benefit this species is evolving and primarily a research/technology – transfer question.
3-358	Public Concern: The Forest Service should re-evaluate the number of insect species on the Cherokee National Forest.	Text in the EIS document reads “at least 156 species of insects”.
3-359	Public Concern: The Forest Service should protect and restore threatened, endangered, sensitive, and locally rare species and their habitat.	Emphasis on restoration and protection of listed and other rare species is provided for by the restoration of ecosystems approach (see the “Watersheds”, Terrestrial Wildlife and Threatened, Endangered, and Sensitive Species Habitat”, “Rare Communities and Old Growth” sections of Chapter 2 of the revised LMP for the various restoration Goals) and by protecting rare habitats for these species(see guidance for RX4.K, Rx9.F, and Rx11 in Chapter 3, revised LMP) wherever they occur. The CNF has followed an approach that protects and enhances the habitat as the first priority. Conservation work for each species is proposed and completed in project level work. Recovery is a priority for listed species on the CNF. The CNF has received concurrence from FWS on actions proposed in the revised LMP. Locally rare species are identified to ensure the biological diversity of the planning area is not diminished. While not protected by any specific law, locally rare species receive further consideration in project proposals if there is a concern.
3-360	Public Concern: The Forest Service should address threatened, endangered, and sensitive species, and their habitat, and provide goals and standards.	Objective 14.03 and the subsequent table (Table 2-3) address management and recovery objectives for threatened, endangered, and candidate species. Goal 14 and Objective 14.01 address monitoring needs for threatened, endangered species and conservation strategies for sensitive species or groups of species. There are numerous forestwide standards that specifically deal with threatened and endangered species. Consideration is given in the EIS, and in the preferred alternative in the LMP.
3-361	Public Concern: The Forest Service should establish enforceable mechanisms for the protection of threatened and endangered species.	Covered by existing legislation, Endangered Species Act. The CNF has consulted with FWS to ensure that we are in compliance with this law.
3-365	Public Concern: The Forest Service should focus management and restoration on any species that is at-risk or in need of management.	Species deemed at risk were considered through the viability analysis (Chapter 3 EIS). See response to concern 3-359 and 3-226.
3-368	Public Concern: The Forest Service should specify provisions for monitoring and evaluating all federally-listed species.	See Appendix G, LMP; “What are the status and trends of federally listed species on the forest?”
3-369	Public Concern The Forest Service should use the best available science to guide management of listed species.	While this is not a specific legal requirement for the FS, as it is for the FWS, we contend our consultation with that agency and other researchers results in the best guidance to manage listed species. The concurrence we received is an assurance of that process.
3-388	Public Concern: The Forest Service should not change the analyses within the Draft Environmental Impact Statement based on the revised recovery plan for the red-cockaded woodpecker.	No comment necessary.
3-389	Public Concern: The Forest Service should make the recovery of threatened and endangered species a priority in the forest plan revision.	See response for concern 3-359, above.
3-395	Public Concern: The Forest Service should specify survey requirements for protected, threatened, endangered, threatened, and sensitive species.	Survey (inventory) requirements for PETS species have been addressed in the regional supplement to the Forest Service Manual (2672.43). This document requires each project proposal and species therein to be evaluated for the need to inventory. This process can be viewed at http://www.southernregion.fs.fed.us/planning/vmeis/final_FSM_2670_supplement.pdf .
3-396	Public Concern: The Forest Service should comply with direction requiring management and recovery of threatened, endangered, and sensitive species.	See response for concern 1-15, above.
3-404	Public Concern: The Forest Service should act to restore current and proposed, threatened, endangered, and sensitive species, not simply maintain populations.	Restoration potential often depends on the type of threats involved, whether or not the FS has control of those threats, and the proportion of the species’ range that falls within NFS lands. Numerous objectives in the new LMP pertain to the restoration of habitats that will benefit TES species. Prescriptions 9F and 4K also provide standards to restore and enhance habitats for TES species. See also recovery objectives given for each Tand E species in LMP Table 2-2. See also Monitoring Chapter, LMP for aquatic species.
3-405	Public Concern: The Forest Service should specify concrete objectives, standards, and target numbers for each species.	This has been done to the extent possible in LMP, Forestwide direction. For some species, it is not possible to quantify exact numbers of individuals given their distribution patterns and lack of knowledge of their life history, lack of knowledge of sampling techniques, etc
3-406	Public Concern: The Forest Service should allow the public and experts to comment on the analysis of endangered species.	The CNF has developed and implemented a consultation agreement with FWS to ensure that the LMP and EIS are in compliance with the Endangered Species Act. Known species specialists, including employees of the FWS, have been included in this process. See also LMP Table 2-2, Threatened, Endangered and Candidate Species for management objectives.

3-421	Public Concern: The Forest Service should specify all state-listed plants and animals, and consider the effects of management actions on these species.	A comprehensive list of species with viability concerns was developed and analyzed within Chapter 3 of the EIS. See response to concern 3-226.
3-421.b	To include establishing goals and standards	A table in the LMP, Chapter 2, Section entitled "Terrestrial Wildlife and Threatened, Endangered and Sensitive species Habitat", responds to this comment. Table 2.2.
3-421.c	To include the tan riffleshell	Management goals providing viable populations of all aquatic T&E species have been established and are discussed in Chapter 3 (sections 11.14 through 11.28) of the EIS.
3-421.e	To add management criteria for specific species under risk	Management goals for providing viable populations of all aquatic T&E species have been established and are discussed in Chapter 3 (sections 11.14 through 11.28) of the EIS. Forestwide and Riparian standards are designed to protect the most sensitive aquatic species including all aquatic T&E species.
3-422	Public Concern: The Forest Service should conduct full surveys and inventories of species and their habitats sufficient to ensure viability.	See response for concern 3-426.
3-422.a	Because the Forest Service has not conducted necessary surveys and inventories. Because the Forest Service has provided no population monitoring data or analysis to document that species will be maintained.	Some comments contend the species viability evaluation places too much emphasis on habitat as opposed to population parameters, and that the existing information on species populations are inadequate to support the effects analysis. As described in the EIS section on Terrestrial Species Viability Evaluation, use of detailed demographic analysis to evaluate population viability is not feasible for the large number of species considered. Therefore, our goal is to use a clearly defined, transparent process to identify species for which there are substantive risks to maintenance of viable populations, and to ensure consideration of appropriate habitat management strategies to reduce those risks to acceptable levels where feasible. This goal applies equally well to the aquatic species viability evaluation. Both aquatic and terrestrial viability evaluations use information on habitat and populations of individual species to assess viability risks. The terrestrial viability evaluation used population abundance in the form of F Ranks as input to viability risk assessment. The aquatic viability evaluation used distribution of populations by watershed and the relationship of watershed disturbance to populations of environmentally sensitive species to assess viability risk. The level of population information used in the analysis is appropriate for the broad-scale strategic planning represented by forest planning.
3-422.c	Because habitat data is an unsuitable surrogate for population data. Because the use of habitat data as a surrogate has been discounted by the Federal judiciary.	Some commenters fault viability evaluation for using habitat as a surrogate for population information, and contend the viability analysis is inappropriately based on the assumption that all suitable habitat is occupied. As discussed in other responses under this concern statement, viability evaluations use both population and habitat information to assess viability risk. Habitat is not used as a surrogate for population information, nor is there an assumption that all suitable habitat is occupied. Even when habitat is not likely to be limiting risk to viability may still be high as a result of population rarity.
3-422.e	Because the viability analyses is based entirely on national forest lands and ignores all other land ownership activities and their direct, indirect, and cumulative effects.	Some comments contend that cumulative effects to species viability is inadequate because only national forest land is considered. This contention is inaccurate. Aquatic species viability evaluation clearly analyzed entire watersheds, including private land conditions, as part of viability risk assessments. In the terrestrial species viability evaluation, the habitat distribution variable explicitly incorporates consideration of conditions on intermixed private lands.
3-422.f	Because of the use of expert judgment and arbitrary approaches and decisions.	See response to concern 3-506.
3-422.g	Because there are no analysis and explanation or justification for including or excluding species in rare species monitoring programs.	See response to concern 3-426.
3-422.h	Because actual population data is required.	See responses to Public Concerns 3-423 and 3-433.
3-422.i	Because the strategy for viability analysis is designed to get around Sierra Club V. Martin.	As discussed in the response to concern 3-426, population monitoring is an important part of providing for species viability in the overall planning process. In addition, the revised LMP includes provisions for population monitoring of management indicator species. The revised plan is designed to keep population monitoring meaningful, feasible, and in compliance with relevant statute, regulation, and case law.
3-422.j	Because monitoring plans and assumptions are based on an unproven theory.	See response for concern 3-426.
3-422.k	Because monitoring that lacks scientific basis violates NEPA and is arbitrary and capricious.	See response to concern 3-447 and concern 3-433.
3-423	Public Concern: The Forest Service should not evade recent court rulings regarding management indicator species monitoring programs.	The revised LMP includes provisions for monitoring populations of management indicator species (see Chapter 5). The approach to MIS selection and monitoring used in the revised LMP is designed to keep population monitoring meaningful, feasible, and in compliance with relevant statute, regulation, and case law, including recent court rulings. See also response to concern 3-433.
3-424	Public Concern: The Forest Service should implement strategies that benefit species listed as threatened, endangered, or in need of management as listed by the State of Tennessee and high priority species listed by Partners in Flight.	The LMP Chapter 2, Terrestrial Wildlife and Threatened, endangered, and Sensitive Species Habitat section contains a goal and objective that speak directly to developing and implementing strategies that benefit species listed as Threatened, Endangered and sensitive species. The LMP contains multiple goals, objectives and standards that contribute towards the implementation of the Partners in Flight regional plan for the Blue Ridge Mountains. This is closely coordinated with the FWS, Migratory Bird Office. See also new LMP, Monitoring Chapter.
3-425	Public Concern: The Forest Service should identify the impact of increased sediment on species in light of the increases from all sources in the watershed.	The watershed analysis (Chapter 3 [section 2.0] of the DEIS) "...indicates that there would be very little change in predicted sediment rates that result from CNF management activities compared to the existing condition in each of the 5 th level watersheds." The aquatic viability assessment evaluates the effects of sediment produced throughout the 5 th level watersheds including both private and NFS lands (Chapter 3 [section 15.2] of the DEIS). This assessment concludes that sediment is stressing 20 of the 5 th level watersheds but the contribution predicted to come from NFS lands is insignificant.

3-425.a	Because minor increases in sediment could create significant cumulative effects to distressed, non-producing populations.	The EIS discloses the environmental effects, including cumulative effects of the proposed programmatic alternatives commensurate with the LMP stage of decision making. Forest Plans do not generally make final irreversible or irretrievable decisions. See also the responses to comments 3-91.
3-426	Public Concern: The Forest Service should build a fine filter species monitoring program, and disregard the existing coarse filter viability analyses.	<p>Some commenters expressed satisfaction that viability evaluations have identified species and habitats most at risk, leading to appropriate attention to conservation of the most threatened habitats and communities. Other commenters pointed to the need for additional "fine-filter" considerations to provide for species viability. Most of these commenters focused on the need for more specificity regarding inventory and monitoring of species of viability concern, including those of local viability concern ("locally rare" species). The FS agrees that inventory and monitoring are critical and necessary components of a program to provide for species viability. The issue is where in the overall planning process the details of these components are considered and documented.</p> <p>Because of the incredible diversity of species on the forest monitoring populations of every species of potential viability concern is not feasible. Practical monitoring programs must combine monitoring of habitat conditions, populations of indicator species, and populations of priority viability concern species. This combination is reflected in the revised LMP's monitoring chapter, which includes monitoring questions that cover all of these elements. The monitoring summary table in Appendix G of the revised LMP provides more specifics on relevant elements to be monitored, including some individual species and species groups. Task sheets, to be used for implementing the monitoring program, provide additional detail, and are available upon request. Additional elements in the monitoring summary table indicate additional inventory and monitoring of viability concern species (including "locally rare" species, where appropriate) will occur based on prioritization developed and revised during LMP implementation. Prioritization will involve use of more site-specific information on species occurrences, in addition to the more general information from the viability evaluations in the EIS. Although many commenters express desire to see more of this detail at this time, more detail at this strategic planning level is not necessary to complete LMP revision. Given the large number of species and the site-specific considerations involved, and the likelihood that priorities will shift throughout the life of the LMP as information is obtained, it is appropriate to establish these additional details as part of LMP implementation.</p> <p>Related comments contend that the set of selected MIS are inadequate to represent all species of viability concern. As discussed above, indicator species are but one part of our biological monitoring program. We have made no effort to select MIS to represent all species of viability concern, nor is there a requirement for us to do so. MIS, as described in 36 CFR 219.19, serve a variety of purposes during forest planning, not all of which are relevant to species viability. Only where appropriate are MIS selected for the Revised Plan "because their population changes are believed to indicate the effects of management activities on other species of selected major biological communities" (36 CFR 219.19 (1)). Reasons for selection of MIS are documented in the relevant sections of the EIS, and in the Management Indicator Species Selection Process Record, which is available upon request. Some commenters correctly noted that we have de-emphasized the role of MIS in viability analysis. We have reduced emphasis on MIS because of the current state of science, which calls into question many traditional uses of the indicator species concept (see MIS Selection Process Record for a brief review). Nevertheless, our selection and use of MIS in this plan revision meets both the letter and intent of regulations.</p>
3-426.b	Because expert judgments were informed by Spectrum which does not accurately model the dynamics of Southern Appalachian forests.	See response to concern 7-58
3-426.c	Because species assignments and methodologies were supposed to be reviewed by a panel of scientists.	See response to concern 3.506.
3-426.d	Because the habitat analysis is based on questionable habitat modeling and educated guesses.	See response to concern 3.506.
3-426.e	Because data by Quentin Bass is not referenced.	See response to concern 7-58.
3-426.f	Because the plans fail to establish fine filter monitoring.	See response to concern 3-426.
3-426.g	Because there are no guidelines to address locally rare species, many of which have high viability concerns.	See response to concern 3-426.
3-426.h	Because the plan fails to provide standards for threatened, endangered, sensitive, and locally rare species.	See response to concern 3-426.
3-426.i	Because managing locally rare species with a coarse filter would be irresponsible and invite extirpation.	RO briefing paper
3-426.j	Because the plans do not assure viability for locally rare species.	RO briefing paper
3-427	Public Concern: The Forest Service should establish goals, objectives, and standards for monitoring threatened, endangered, sensitive, and locally rare (TESLR) species.	Monitoring is outlined in Chapter 5 of the revised LMP. Monitoring of species with viability concerns will be conducted. The CNF strategy is to monitor species and/or their habitat based on the objective for any particular species. Some species will need a very detailed plan, others may be monitored through partnerships with other organizations.
3-428	Public Concern: The Forest Service should protect sensitive species.	Direction exists in the Forest Service Manual 2670.
3-430	Public Concern: The Forest Service should abolish programs related to sensitive and locally rare species.	This decision is beyond the scope of the revision of the LMP.
3-430.c	Because such lists are subjectively developed with little documentation	Regardless of personal opinion on the need for protection for these species, the Forest Service is legally obligated to provide for their viability. See response to 3-430.
3-433	Public Concern: The Forest Service should specify numerous management indicator species, including plants, aquatic life, insects, fish, birds, and particularly, salamanders.	Several commenters indicate that reasons for selection of MIS are not given, and that selected MIS are not adequate to meet legal requirements. Reasons for selection of MIS are documented briefly in Chapter 5 of the revised LMP and in the sections of the EIS relevant to each MIS. More detailed rationale for MIS selection is found in the Management Indicator Species Selection Process Record, which is available upon request. This record documents a selection process that is designed to follow closely the MIS requirements in 36 CFR 219.19 (1982 version). Species were considered for selection under each of the five

		<p>categories listed in 36 CFR 219.19(1), and selected where appropriate. Two primary criteria were used to judge appropriateness of a species as MIS: 1) changes in the species' population should primarily reflect the effects of national forest management activities, and 2) population trends of the species must be capable of being effectively and efficiently monitored and evaluated in terms of habitat changes.</p> <p>Finding species that meet these criteria is more difficult than it might first appear, especially in light of current scientific understanding. When regulations were adopted in the early 1980s, use of MIS was deemed the best approach for addressing biological diversity. Today, their use as the sole or primary means of planning and evaluating biological diversity is overly simplistic. A tremendous amount of research and scientific publication has occurred over the past twenty years, giving us much greater insight into ecological interactions and ecosystem functions. We now have a much greater appreciation for the complexity of population responses, and the limitations of using one species as a "proxy" for whole communities (see literature cited in the MIS Selection Process Record). We also are more aware of the inherent difficulties in precisely monitoring populations of many species.</p> <p>As a result, we have reduced our emphasis on MIS during this round of planning, while staying in compliance with both the letter and intent of related regulations. At the same time, we have greatly increased emphasis on consideration of viability of many more individual species, and incorporated use of ecologically-based vegetation classification systems, newly developed by the Nature Conservancy and NatureServe. Use of this classification system includes recognizing and protecting rare community types. In addition, rather than focusing on a handful of individual species, our monitoring programs have increased emphasis on monitoring species groups and communities, such as birds, bats, fish, and rare communities, because this approach will give us much better information on more species and on overall system function. Where appropriate, individual species also will be monitored. We also will continue to work with our partners in Forest Service Research and at universities to encourage and support research on key biological issues that are too complex to be addressed through our monitoring programs.</p> <p>This shift in emphasis reflects our understanding of the current state of science, and an increased commitment to biological conservation, not, as some commenters suggest, an attempt to avoid these issues.</p> <p>Other commenters contend that selected MIS are not adequate to represent all species or potential management effects as needed to provide for species viability and forest health and diversity. Of the five categories of MIS listed in the regulations, only one category is to be selected because they are believed "to indicate effects of management activities on other species of selected biological communities..." (36 CFR 219.19(1)). The purpose of other categories of MIS are to focus attention on effects of management on T&E recovery, species with special habitat needs "that may be influenced significantly" by management, and meeting public demand for game and non-game species. The MIS Selection Process Record clearly documents our consideration of species under each of these categories.</p> <p>Based on these five categories, it is clear that not all MIS are to serve as "proxies" for other species; some are of direct interest themselves. Regulations make no direct link between species viability requirements and MIS. Use of MIS as the sole or primary means of assessing viability risk is not consistent with best science, as documented in literature cited in the MIS Selection Process Record. We have made no effort to select MIS to represent all species or all management effects, nor is there a requirement for us to do so. As indicated above, species viability requirements have been addressed primarily through direct evaluation of all species of viability concern and a mix of monitoring strategies.</p>
3-433.a	To study forest health and comply with laws.	See response to concern 3-433.
3-433.d	Because ruth's golden aster will not provide information about other federally-listed species	All federally listed species will be individually monitored. Ruth's golden aster is also "tagged" as a MIS due to the fact that we have management activities that are specifically designed to enhance it's recovery and this is specifically mentioned as a "category" for the selection of MIS. We do not intend to use the results of the monitoring of this species as a surrogate for any other monitoring effort.
3-434	Public Concern: The Forest Service should include aquatic species as management indicator species.	The Forest Service chose to monitor aquatic communities rather than MIS for the following reasons: The use of MIS is controversial because it is based on the assumption that suitable habitat for the indicator is also suitable for other associated species. For a species to be a good indicator of changes in habitat, it has to be one of the most sensitive members of the community to a particular stressor. These species are often rare and/or difficult to monitor. Species that exhibit these characteristics show inconsistent patterns that cast doubt on their usefulness as indicators. Researchers (citations available upon request) have found that fewer samples are needed to precisely estimate community level attributes than to estimate species attributes and recommend the use of species groups or community indices over individual species for stream fish studies.
3-434.a	To include stream monitoring objectives and enforceable mechanisms.	The objective of monitoring aquatic macro-invertebrates is not to establish long-term trends in populations. Rather, the purpose is to document changes in sensitive macro-invertebrate populations associated with a specific ground disturbing project. No aquatic MIS were identified because species vary from stream to stream and an adequate MIS list could include hundreds of species. Project monitoring of aquatic macro-invertebrates is scheduled to occur before and after project implementation. Because monitoring is tied to the project budget, it will, generally, be accomplished in the same fiscal year as the project.
3-434.d	To promote species viability	The aquatic viability assessment acknowledges that NFS lands do not provide sufficient habitat to insure the viability for some aquatic TES species. Efforts are ongoing and will continue to work with private landowners to protect important habitats that extend off of NFS lands.

3-436	Public Concern: The Forest Service should not rely on wild trout as a sufficient management indicator species for aquatic habitats.	These concerns apply only to the Jefferson NF. The Cherokee NF does not use trout as a MIS.
3-438	Public Concern: The Forest Service should consider a reasonable range of alternatives for proposed endangered, threatened and sensitive species as management indicator species.	The MIS process record outlines the rationale for species selection. See response to concern 3-433.
3-447	Public Concern: The Forest Service should not use habitat types as indicators for species viability.	Habitat is one of several components that was evaluated as a part of the terrestrial viability analysis process. For a complete explanation of the process see the Terrestrial Viability section (Chapter 3, Section 15) in the EIS.
3-447.a	Because a mix of successional habitat does less well for species that need mature forests.	<p>Comments express dissatisfaction that the evaluation lacks sensitivity to identify more differences in effects to species viability among alternatives. This issue is addressed in the EIS section on terrestrial viability evaluation. Primary reasons for relatively small differences are: much risk to viability is a result of factors substantially outside Forest Service control such as surrounding land uses in national forest landscapes and watersheds, exotic pests, and pollution; the most critical management measures were included in all alternatives to ensure they all meet minimum legal requirements for viability; and activity levels proposed under all alternatives are modest relative to the total land base.</p> <p>Comments contend that the differences in viability effects that are disclosed are skewed to those species requiring disturbance-dependent habitats, and that detrimental effects to species associated with low-disturbance habitats are not adequately disclosed. This appearance reflects the fact that, under current conditions, disturbance-dependent habitats are generally more limiting on national forest land than are low-disturbance habitats. Therefore, the risk assessment is more sensitive to changes in their abundance. While increasing disturbance-dependent habitats often may cause a reciprocal decrease in low-disturbance habitats, the marginal effect in these more common low-disturbance habitats results in less change to viability risk. In addition, this reciprocal relationship is not as direct as it might first appear. Some restoration and maintenance of disturbance-dependent habitat is expected to occur in communities on dry and xeric sites, where fire suppression has resulted in conditions that do not represent quality habitat for either disturbance-dependent or low-disturbance species. Adding disturbance in these situations is a way to have cake and eat it too.</p>
3-447.b	Because statements about habitat elements with the highest risk species are not supported by species/habitat relationship tables.	See response to comments 3-447 .
3-450	Public Concern: The Forest Service should adopt the entire group of salamanders as management indicator species.	<p>Commenters suggest salamanders should be selected as MIS, and they cite literature from scientific journals that support the appropriateness of salamanders as MIS. We have reviewed this literature and recognize the validity of the general points presented. However, other evidence from the scientific literature highlights inherent difficulties in monitoring trends of salamander populations. Based on a study of salamander monitoring methods conducted in the Great Smoky Mountains National Park, Hyde and Simons (2001. Sampling plethodontid salamanders: sources of variability. <i>Journal of Wildlife Management</i> 65(4):624-632.) concluded “[t]he extreme variation inherent in all the methods we examined (CV > 100%) severely limits their utility for population monitoring” and “[t]he feasibility of monitoring terrestrial salamander populations over large geographic areas using current methodologies remains suspect.” They also state “the development of reliable sampling methods...is essential before extensive monitoring programs are established.” In addition, selecting salamanders as a group, as some commenters suggest, is overly simplistic. According to Hyde and Simons, “[b]ecause spatial and temporal patterns of distribution and abundance are species-specific, salamander population data should be considered on a species-by-species basis.” Our MIS Selection Process Record cites this study as a supporting reason for not selecting salamanders as MIS. We have amended our process record to reflect the diversity of opinion in the scientific literature, but until some of the uncertainties related to monitoring methods are worked out, we do not believe it wise to select salamanders as MIS.</p> <p>It should be noted that not selecting salamanders as MIS does not mean they are to be ignored. Several salamanders have been analyzed as species of viability concern. Status of their habitats and/or populations will be monitored during plan implementation (see Monitoring Summary Table, Forest Plan Appendix G). In addition, general effects of management activities on salamander populations have been well documented in the scientific literature. Management actions (such as overstory removal and prescribed burning) that result in drying of litter and upper soil layers is detrimental to most salamanders and their habitats. The LMP includes strategies for maintaining moist-soil habitats, such as emphasizing mature forests in riparian corridors, and protecting seeps, springs, bogs, fens, seasonal ponds and prime coves as rare communities. A relatively small proportion of mesic sites is expected to be negatively impacted from management activity, while the majority of these sites are expected to continue to age and improve in quality (with some serious exceptions due to invasion of the hemlock wooly adelgid, an invasive non-native insect).</p>
3-462	Public Concern: The Forest Service should use the All Species Inventory for Smoky Mountains National Park as an example of an adequate monitoring program.	The Park’s All Taxa inventory is a comprehensive effort funded by a strong non-profit arm and hundreds of volunteers. Some of these resources are currently unavailable to National Forests. It exceeds what might be considered an “adequate” monitoring program, and exceeds the legal requirements for monitoring by the US Forest Service. As the resources and opportunities for partnering become available to the CNF,+ they may be utilized.
3-463	Public Concern: The Forest Service should not use the same management indicator species for all alternatives.	Regulations related to MIS state: “Planning alternatives shall be stated and evaluated in terms of both amount and quality of habitat and of animal population trends of the management indicator species” (36 CFR 219.19(2)). MIS are not actions or outputs, the variables that typically vary by alternative. They are planning tools, used to “indicate” management effects by alternative. Changing MIS with each alternative would greatly reduce our ability to use them to compare and contrast effects across alternatives, and is not consistent with our reading of regulation intent.
3-464	Public Concern: The Forest Service should not use common species and community level monitoring as (or in lieu of) management indicator species.	The Forest Service chose to monitor aquatic communities rather than MIS for the following reasons: The use of MIS is controversial because it is based on the assumption that suitable habitat for the indicator is also suitable for other associated

		species. For a species to be a good indicator of changes in habitat, it has to be one of the most sensitive members of the community to a particular stressor. These species are often rare and/or difficult to monitor. Species that exhibit these characteristics show inconsistent patterns that cast doubt on their usefulness as indicators. Researchers (citations available upon request) have found that fewer samples are needed to precisely estimate community level attributes than to estimate species attributes and recommend the use of species groups or community indices over individual species for stream fish studies. See response to concern 3-433.
3-464.a	Because there is no scientific support for this approach.	See response to concern 3-433.
3-464.c	Because management indicator species are supposed to include species with special habitat needs, threatened and endangered species, and non-game species of interest.	See response to concern 3-433.
3-465	Public Concern: The Forest Service should provide explanation and documentation for the elimination and reduction of management indicator species, and the selection of management indicator species and monitoring methodologies.	See response to concern 3-433.
3-465.b	Because the proposed approach violates NEPA.	Expected effects to amount and quality of habitat and to MIS population trends are analyzed and disclosed under the appropriate sections of the EIS, in compliance with both NEPA and NFMA..
3-465.c	Because the proposed approach violates the National Forest Management Act.	See response to concern 3-433 and 3-465.
3-473	Public Concern: The Forest Service should, in the effects analysis, make clear that natural processes contribute to the desired future condition of areas.	Chapter 3 of EIS under the Successional Habitats section discusses effects of early successional habitats created by natural disturbances such as insect outbreaks and wind events. This is discussed in the cumulative effects section and refers to these types of disturbances being considered as part of the existing condition, in the site specific analysis's for project implementation.
3-475	Public Concern: The Forest Service should manage south and west facing slopes as grassy savanna or otherwise disturbed conditions, and increase understory and canopy complexity towards "old growth-like" conditions along north and east facing slopes and coves.	The revised LMP has an objective to create and maintain approximately 5,700 acres of dry and xeric oak and pine-oak forests to open woodlands, savannas, and grasslands. This would generally be the western and southern facing slopes for the CNF. This will be accomplished by harvesting trees and prescribed burning and is approximately 2% of the acres available for timber management activities on the CNF. Objectives are also included in Chapter 3 under individual management prescriptions for mid successional habitats.
3-476	Public Concern: The Forest Service should explain the reasoning for additional old growth on National Forest System lands.	Refer to the regional old growth guidance for an explanation. Additional old growth areas for the CNF depend heavily on Management Prescriptions that are compatible with Old Growth objectives. These management prescription allocations have objectives other than timber production such as wilderness, scenic areas, and riparian areas
3-477	Public Concern: The Forest Service should not use habitat types as indicators for species viability.	Comments suggest that we should use management indicator species (MIS), rather than habitat, to drive viability evaluation, and that the set of selected MIS are inadequate to represent all species of viability concern. Use of MIS as the sole or primary means of assessing viability risk is not consistent with best science, as documented in literature cited in the MIS Selection Process Record. Indicator species are but one part of our biological monitoring and evaluation program. The FS made no effort to select MIS to represent all species of viability concern, nor is there a requirement for us to do so. MIS, as described in 36 CFR 219.19, serve a variety of purposes during forest planning, not all of which are relevant to species viability. Only where appropriate are MIS selected for the revised LMP "because their population changes are believed to indicate the effects of management activities on other species of selected major biological communities" (36 CFR 219.19 (1)). Reasons for selection of MIS are documented in Chapter 5 of the revised LMP, in the relevant sections of the EIS, and in the Management Indicator Species Selection Process Record, which is available upon request. Some commenters correctly noted that the role of MIS is de-emphasized in viability analysis. We have reduced emphasis on MIS because of the current state of science, which calls into question many traditional uses of the indicator species concept (see MIS Selection Process Record for a brief review). Nevertheless, our selection and use of MIS in this plan revision meets both the letter and intent of regulations.
3-479	Public Concern: The Forest Service should implement a number of management strategies to support black bear habitat.	See response for concern 3-320.
3-480	Public Concern: The Forest Service should acknowledge that the classification used for major forest communities is a generalization.	One commenter suggests that we make clear that the classification of major forest communities used in the terrestrial species viability evaluation is a generalization so that the limitations of the classification are apparent, and that the classification used is of little use as a screen for viability concern species. All classification systems are generalizations. To plan for habitats, the continuum of conditions on the ground must be generalized into a classification system so that they may be analyzed. For the terrestrial species viability evaluation, we looked at a variety of forest community classification systems, including the Forest Services CISC data classification, NatureServe's vegetation classification, and the classification system developed for old growth planning. While each of these has its advantages, none exactly matched the habitat association groupings that were most apparent when we looked at the full set of habitat needs for each species of potential viability concern. To facilitate and simplify species viability analysis, we lumped some forest communities together, where keeping them separate did not add appreciably to our ability to focus management direction or analysis. Major forest communities used in the viability analysis are defined and cross-walked to CISC in chapter 2 of the Forest Plan, under Vegetation and Forest Health. The commenter does not specify where they feel this lumping has resulted in erroneous or misleading conclusions.
3-483	Public Concern: The Forest Service should provide for the protection and recruitment of large woody debris by retaining all trees within one site potential tree height of a stream.	Riparian areas are managed for the recruitment and retention of large woody debris. Specific large woody debris needs are determined on the basis of stream characteristics. See Riparian corridor prescription.
3-487	Public Concern: The Forest Service should protect and recruit large woody debris as an important component of forested environments.	Comments focus on recruitment of coarse woody debris into stream systems. Some commenters feel that ephemeral stream guidelines are not sufficient to provide this recruitment. Provisions in the Riparian Prescription, including emphasis on late successional forests, are designed explicitly to provide for coarse woody debris. See LMP, Chapter 2 section on Watersheds,

		and Chapter 3, prescription 11 for discussion of this.
3-493	Public Concern: The Forest Service should list the number of native flowering plants on the Cherokee National Forest.	No comprehensive list of the flora of the CNF has been developed. We have multiple provisions for ensuring the maintenance of biodiversity and the protection of rare species on the landscape.
3-499	Public Concern: The Forest Service should change prescriptions to 8.C for the Laurel and Stillhouse Branches.	The CNF followed Regional design criteria in designating roadless and wilderness study areas for Alternative I. Other prescriptions were considered for these locations under other alternatives. Covered by range of alternatives.
3-503	Public Concern: The Forest Service should change prescriptions for Ripshin and Strawberry Mountains.	See response for concern 3-334.
3-504	Public Concern: The Forest Service should establish specific objectives for monitoring.	<p>Chapter 5 of the LMP provides for monitoring of the plan, identifying the basic questions to be addressed in monitoring the effectiveness of the plan. Guidelines in Chapter 5 are detailed further in the Monitoring Summary Table in Appendix J. The monitoring summary table identifies specific, measurable elements of each monitoring question and ties them back to the goals, objectives and standards of the plan. Specific methods for monitoring are not required as part of the plan but will be provided in task sheets maintained outside the plan to provide for dynamics of implementing the monitoring plan. Each task sheet is tied back to a monitoring element in the Appendix J summary table.</p> <p>36 CFR 219.12 (k) details the regulatory requirements for monitoring and evaluation of forest plans. Additional policy and guidance is provided in Forest Service Manual 1920 and Forest Service Handbook 1909.12, Chapter 6.</p> <p>The overall objective of monitoring and evaluating forest plans is to determine whether programs and projects are meeting forest plan direction. Within this broad objective, specific goals are to:</p> <ol style="list-style-type: none"> 1. Ensure that forest plan goals and objectives are being achieved and management prescriptions are being implemented as directed. 2. Determine if the costs of implementing the plan and the management effects are occurring as predicted. <p>In response to these requirements, the matrix reflected in the monitoring summary table reflects the relationships between each of the forest plan goals and objectives and the monitoring questions and elements. Due to the integrated nature of plans and management of resources, there is often a combination of actions and effects that must be evaluated together to be meaningful. The Monitoring Plan in this way represents a strategic approach that reflects these relationships rather than the development of monitoring for each goal and objective independently. Annual monitoring of costs for implementing the plan is provided.</p>
3-506	Public Concern: The Forest Service should subject analysis of species viability and management indicator species to peer review.	<p>Although formal peer review of completed viability evaluations were not conducted, elements of external review and adjustment were incorporated throughout the viability evaluation process. For the terrestrial viability evaluation, basic information on species status, habitat relationships, and threats was obtained through an agreement with NatureServe, leading to involvement of a large number of experts from state agencies and academia. Habitat Association Reports, which served as the basis for many management recommendations, were subject to peer review. Later, recommended plan language was reviewed by both endangered species and migratory bird staffs of the FWS. The aquatic viability evaluation process was in large part developed by scientists from The University of Georgia. During the comment period on the DEIS, we solicited process reviews of both the terrestrial and aquatic viability analyses by Forest Service research scientists, who assessed the evaluations for consistency with best science (record of these reviews are available on request).</p> <p>Some comments contend that the terrestrial viability evaluation needs peer review because too many steps in the process depend on expert judgments. Three primary variables drive the viability risk assessment: current species abundance, expected future habitat abundance, and expected future habitat distribution. Current species abundance, or F Ranks, were developed by external experts, reviewed by Forest Service biologists, and negotiated where differences in data or opinion occurred. Therefore, this variable has been through a fairly rigorous review process. Expert judgment was often involved in assigning habitat variables to broad categories. However, all of these variables were combined in the evaluation in a transparent and mechanical way so that their contributions assessed viability risk is obvious.</p>
3-508	Public Concern: The Forest Service should modify various management prescriptions used in the Cherokee National Forest.	The leadership deliberated on the allocation and allocation for each prescription. Further consideration was given by the LMP revision team. Every area on the CNF was considered individually, to determine which FWRBE option to apply. The results of this are displayed on Appendix B of the EIS.
3-512	Public Concern: The Forest Service should modify certain objectives for the Cherokee National Forest.	The LMP contains an objective for spruce-fir restoration. An objective of 1000 acres of high elevation early successional habitat is in the LMP.
3-516	Public Concern: The Forest Service should modify certain standards for the Cherokee National Forest.	See response for concern 7-280, 7-290 and 7-299.
3-519	Public Concern: The Forest Service should review research to balance the assertions of Forest Service employee Quentin R. Bass.	See response to concern 7-437.
3-520	Public Concern: The Forest Service should acknowledge the Quentin Bass material in the forest plan revision process.	The referenced paper is part of the public record and, as such, is available for public review. However, all research that the plans are based on does not necessarily end up in the EIS or LMP, which are circulated for review during the Draft comment period. In fact, little more than citations of research are made in the planning documents. See response to concern 7-437.
3-524	Public Concern: The Forest Service should protect or restore rare communities.	Some commenters desire to see more detail on what activities are likely to be involved in rare community maintenance and restoration. Maintenance includes protection from adverse effects of management activities, recreational uses, and invasive nonnative species, where warranted. Restoration will primarily involve restoring composition, structure, or function within

		existing rare communities where these characteristics are outside desired ranges. In some cases, restoration may involve expanding or reestablishing rare communities where they once likely occurred. Primary management needs for maintenance and restoration are indicated in rare community definitions in the plan [See the LMP, Chapter 3, Prescription 9.F section]. Because of the variety of needs that may arise, it is not desirable to get too specific about, or to limit, the kinds of activities that may be involved in maintenance or restoration of rare communities. Under the direction in the revised LMP, it will be incumbent on project-level planning to demonstrate that proposed actions to be implemented in rare communities will meet the purpose of maintaining or restoring these communities.
3-525	Public Concern: The Forest Service should provide clarification about the designation of forested boulder fields as a rare community type.	The FS relies on the organization NatureServe's expertise to define, rank and characterize rare elements, including rare ecological communities. NatureServe's input was utilized during the LMP revision process.
3-526	Public Concern: The Forest Service should provide guidance that specifies how areas will be delineated and reassigned to Management Prescription 9.F, Rare Communities.	See response to concern 3-535.
3-531	Public Concern: The Forest Service should encourage the use of a fine filter in Management Prescription 9.F.	See response to concern 3-542.
3-534	Public Concern: The Forest Service should implement the rare community classification and protect species and areas outside these communities.	See responses to Public Concerns 3-535 and 3-542.
3-535	Public Concern: The Forest Service should protect rare communities.	Several commenters compared provisions for rare communities across forests and found differences. Concerns include lack of delineation of rare communities and allocation of specific acreage to the Rare Community Prescription, and uncertainty about when, where, and how rare communities would be inventoried, delineated, and allocated. Despite some differences that have resulted as regional recommendations were incorporated into individual plans, the revised LMP includes language that makes clear the CNF intent with regard to rare communities. Rare communities are given high priority for maintenance and restoration wherever they occur on the CNF. Inventories of rare community are improved through a variety of approaches, including project-level surveys where needed to ensure maintenance or restoration of rare communities. As rare communities are located and mapped, they are be managed according to the Rare Community prescription, unless or until such allocation would result in a substantial impact to achievement of conditions and outputs envisioned in the LMP. The LMP indicates that rare communities are monitored for number and acreage of occurrence, condition (which includes presence of rare species), management needs, and management accomplishments. This focus ensures that rare communities continue make a critical contribution to community and species diversity on the forest. Additional species-specific provisions, called for by some commenters, are addressed in responses to Public Concerns 3-426 and 3-542.
3-538	Public Concern: The Forest Service should not use funds for special areas and rare communities to the detriment of common species.	CNF management activities comply with the Endangered Species Act, National Forest Management Act, and other applicable laws and policy regarding species emphasis.
3-540	Public Concern: The Forest Service clearly delineate rare communities and allocation; provide specific direction for restoration; establish standards for monitoring, maintaining records, and surveying; identify and protect all special areas; and, establish goals, objectives, and standards for special areas and rare communities.	See response to Public Concern 3-535.
3-541	Public Concern: The Forest Service should specify guidance and standards for rare communities, how areas will be reassigned to Prescription 9.F prescriptions, and when this will occur.	See response to Public Concern 3-535.
3-542	Public Concern: The Forest Service should protect species occurrences that fall within general forest areas outside rare communities.	Other commenters focused on the need to identify and protect, maintain, or enhance locations where viability concern species occur, especially when these occurrences are outside of areas targeted for optimal protection and management (e.g., rare communities). They argue that maintaining or enhancing these occurrences is necessary to provide for species viability. The FS agrees. This issue also is a question of where in the overall planning process such consideration should occur. Site protection is generally considered and provided at the project level through site-specific environmental analysis. In addition, known locations of viability concern species can be used during plan implementation to select sites for projects designed to maintain or restore important habitats. Because of their site-specific nature, these considerations are plan implementation functions that are more appropriately addressed outside of the LMP. Ultimately, CNF success at meeting viability requirements must be viewed from the perspective of the entire planning process, which includes not just the strategic LMP, but also plan-to-project considerations, site-specific project analysis, and monitoring feedback. The treatment given to species viability in the revised LMP and EIS provides a solid, and much improved, strategic framework from which to meet species viability requirements as the revised LMP is implemented and monitored.
3-546	Public Concern: The Forest Service should increase mast production.	Methods for evaluating, estimating, and projecting mast production are un reliable. The revised LMP ensures that all restoration/reforestation activities maintain forest communities to those plant communities predicted as most likely to occur based on the ecological potential of the site. This is based on what was taken from the site and the International Classification of Ecological Communities: Terrestrial Vegetation of the US, Cherokee National Forest Final Report, June 2002, by NatureServe. With this guidance oak will be replaced with oak and sites that have oak as potential natural vegetation will be restored to oak. The revised LMP has guidance for silviculture prescriptions to develop advance growth oak on productive sites to ensure oak species are not replaced with more aggressive species such as yellow poplar. In recent years great strides have been made in protocol for growing oak seedlings for planting. Seedlings grown to this protocol can complete with other vegetation when outplanted and provide another method to ensure oak and mast production, are part of the CNF in the future.
3-561	Public Concern: The Forest Service should not overly emphasize fire management on National Forest System lands in the Southern Appalachian.	Fire played an important role in shaping the species rich landscape of the southeastern U.S. Fires of both natural and cultural origin were common on the landscape when the present arborescent flora migrated into the region after the last ice age, 8,000 to 10,000 years ago (Delcourt and Delcourt, 1996). Fire has been a part of the southern Appalachian landscape for longer

		than its current vegetation has been (Delcourt and Delcourt, 1996). In attempts to determine fire history and presettlement vegetation for an area, all sources of evidence are considered. Information can be gathered from: landscape and environmental evidence, historical evidence, and vegetation evidence (Frost 1998). Appalachian forest managers used local sources of information and local scientific research to determine fire history and the role of fire in the ecosystems they represent. Those are referenced in their appendixes. Also note that in Ecosystem Management for Sustainability Principles and Practices Illustrated by a Regional Biosphere Reserve Cooperative (1999) that Edward Buckner and Nicole Turrill provide a good summary of fire management options in southern Appalachian landscapes based on research accomplished in this geographic area.
3-645	The Forest Service should manage old growth forests. Because managing for old growth will create health problems in the future\ Because increased risks of insects and disease endanger private lands 382 Because we have enough old growth 382 Because pine beetle problems occur due to advanced age 383 Because unmanaged forests promote wildfires and diversion of funds 383 To maintain wildlife and forest conditions 383	The regional guidance for conserving and restoring old growth forest communities outlines different approaches for managing old growth, which includes options from “doing nothing” to active management regimes of extended forest rotations designed to sustain a flow of replacement old growth stands over time. These options are reflected in Management Prescriptions 6.A. through 6.E. The forest management teams and interdisciplinary teams considered these options in determining which approaches would best address the old growth management issue. In addition to those areas allocated to a Management Prescription 6 Category, other areas allocated to other Management Prescriptions will also provide future old growth stands. These acreages are displayed in the EIS at section 8.5.0 “Old Growth.” The goals, objectives and standards in the LMP ensure that the regional guidance is followed, and old growth needs are met. See response to Public Comment 7-224.
4-2	Public Concern: The Forest Service should emphasize the importance of the transportation system.	Access and road management was identified as one of the significant issues considered in defining the alternative management strategies. Science-based roads analyses at the appropriate scales (forest, watershed and project-scales) is conducted as required in FSM 7712. The objectives of roads analyses are to provide Forest Service planners and decision makers with critical information to develop road systems that are safe and responsive to public needs and desires, are affordable and efficiently managed, have minimal negative ecological effects on the land, and are in balance with available funding for needed management actions.
4-4	Public Concern: The Forest Service should develop and enforce road density standards.	Open roads density standards should only be established when supported by site-specific science-based analysis. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities for implementation. When open road density standards are warranted, measures will be taken to enforce the standards.
4-5	Public Concern: The Forest Service should reduce road density to achieve densities consistent with recommendations based on science.	The alternatives displayed in Chapter 2 of the EIS indicate the opportunity to increase or decrease current road density. The commenter appears confused by the direction he quotes. FW 38 and FW-39 refer to TWRA designated bear reserves, regardless of the allocated prescription. The desired condition statement for Prescription 8.C areas states that the open road density will remain stable or decrease. Prescription 8.C and TWRA designated bear reserves are not coincident. Survey results indicate that the black bear population on the CNF is increasing, thus is not limited by the existing open road density.
4-9	Public Concern: The Forest Service should use road-building funds for trail construction and maintenance.	Congress appropriates funds for specific purposes. The agency is limited in its ability to change the purpose of the funding.
4-12	Public Concern: The Forest Service should only allow stream crossings when no feasible alternative exists.	Stream crossings in a managed forest environment are essential and are designed to minimize disturbance to the riparian area and aquatic resources. Standards in the Riparian Prescription, forest-wide standards and contract specifications for road construction are developed to insure they do not adversely impact aquatic species.
4-13	Public Concern: The Forest Service should provide a high level of forest road management.	In the alternatives section of the DEIS various levels of forest road management are identified. Direction in Chapter 2 of the revised LMP, in the “Facilities, Roads and Access” section focuses on providing a safe and efficient road system that protects forest resources.
4-17	Public Concern: The Forest Service should develop goals and objectives for reducing road mileage to fiscally responsible levels.	Each forest has objectives for road management. In addition, before the Record of Decision is signed finalizing the decision on the plan, a Roads Analysis is completed that lays out objectives for road management, including reduction of road miles.
4-18	Public Concern: The Forest Service should develop more road access to National Forest System lands.	This concern is best addressed at a watershed or project decision level. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needs for additional access and to recommend priorities.
4-20	Public Concern: The Forest Service should better maintain access so as to not impair forest recreation.	The Forest Service roads policy requires a roads analysis be conducted at appropriate scales, including forest wide for the Forest Plan. The impact of the road system on recreation, both roaded and unroaded, is addressed in that analysis. The forestwide analysis is available for review at the Forest Supervisor’s office.
4-21	Public Concern: The Forest Service should manage road access and human disturbance along roadways.	The CNF cooperates with TWRA in managing human access and disturbance. Standards found in the “Terrestrial Wildlife and Threatened, Endangered and Sensitive Species Habitat” section of Chapter 2 in the CNF revised LMP establish capacities for motorized access in state-designated bear reserves. Additional road closures to protect wildlife will be evaluated at the project level.
4-22	Public Concern: The Forest Service should develop the roads policy at the forest level.	The Forest Service roads policy requires a roads analysis be conducted at appropriate scales, including forest wide for the revised LMP. Subsequent watershed or project level roads analyses will evaluate specific roads.
4-24	Public Concern: The Forest Service should not pave several roads.	The decision of whether or not to pave specific roads is outside the scope of the revised LMP, and will be addressed in site-specific project analyses.

4-25	Public Concern: The Forest Service should pave forest roads with permeable methodologies to stop runoff and increase user access.	NFS roads serve many uses and are constructed and maintained to best serve the intended use within available funding. These roads may range from single lane roads with turnouts to double lane roads. Road surfaces vary from native surfaced to bituminous paved roads. Road management objectives are developed for each NFS road that guide road design criteria and planned maintenance. Many factors are considered in determining what type of road surfacing is most appropriate. They include, but are not limited to traffic (volume and types of vehicles), resource protection (water quality, erosion, etc.), climate, strength of underlying soils, user safety and comfort, economics and availability of funds. Road management objectives are reviewed periodically for appropriateness.
4-32	Public Concern: The Forest Service should conduct the roads analysis process.	A forest-scale roads analysis has been completed to inform the decision as required in FSM 7712. While it is desirable to have the forest-scale roads analysis completed prior to issuance of the draft, it is not a requirement.
4-33	Public Concern: The Forest Service should incorporate the analysis of the road system into the draft plan revision before it becomes final and involve the public in the roads analysis process.	A forest-scale roads analysis has been completed to inform the decision as required in FSM 7712. The roads analysis process is not a NEPA decision process and therefore does not require a formal public scoping and comment period. Public involvement in identification of issues and assessment of transportation needs and opportunities was encouraged and welcomed.
4-34	Public Concern: The Forest Service should conduct a new roads analysis.	The forest-scale roads analysis was not intended to analyze the all roads (classified and unclassified) on NFS lands. There are multiple scales at which roads analysis may be conducted to inform road management decisions. Roads analysis at the forest-scale provides the context for informing road management decisions and activities at the watershed, area and project level. The forest-scale roads analysis and the resulting report 1) display the classified roads and display how the roads are intended to be managed; 2) provide guidelines for addressing road management issues and priorities; 3) identify significant social and environmental issues, concerns and opportunities to be analyzed through lower level analyses; and 4) document coordination efforts with other government agencies (FSM 7712.13b.). The Responsible Official has the discretion and duty to determine whether or not a roads analysis below the forest-scale is needed and the degree of detail that is appropriate and practicable. (FSM 7712.13)
4-34.d	And improve quality access with fewer roads	The CNF has completed the required forestwide roads analysis. Goals and objectives in the revised LMP specify decommissioning unneeded roads, upgrading highly used roads and constructing new roads only where allowed by prescription and where existing roads are inadequate.
4-35	Public Concern: The Forest Service should ensure that the Cherokee National Forest's roads policy is in compliance with the national roads policy.	See response 4-22.
4-36	Public Concern: The Forest Service should develop criteria for when a watershed or project scale roads analysis will be needed.	The Forest Service has issued direction on roads analysis at the watershed and project scales. "The responsible official has the discretion and duty to determine whether or not a roads analysis below the forest-scale is needed and the degree of detail that is appropriate and practicable. Guidance on selecting the appropriate scale and those proposed actions which may trigger a need for a roads analysis is set forth in FSM 7712.13, paragraphs a-c." (FSM 7712.13) Additional guidance is provided in the report Roads Analysis: Informing Decisions About Managing the National Forest Transportation System (USDA Forest Service, 1999, Misc. Report FS-643).
4-37	Public Concern: The Forest Service should demonstrate which roads are necessary to implement the forest plan.	Specific roads are not addressed in the Forestwide Roads Analysis. Individual roads are addressed in site-specific watershed or project level analyses.
4-39	Public Concern: The Forest Service should include only realistic projections of environmental effects in the roads analysis based on likely natural processes and management activities.	The effects analysis disclosed in the EIS uses the best scientific information available. The forestwide roads analysis is consistent with the prescription allocation for all alternatives considered in detail. The environmental effects analysis is based on reasonable projections that reflect natural processes that are likely and management activities that are anticipated. Since these processes and activities have not yet occurred, it is difficult to determine what they will be, however, it is the job of the interdisciplinary team to make these determinations.
4-40	Public Concern: The Forest Service should better identify National Forest System roads.	The effects analysis at the programmatic LMP level is useful in comparing and evaluating alternatives on a forestwide basis, but is not intended to provide sufficient detail to be applied to specific locations on the CNF. A CNF-scale roads analysis has also been completed to help inform the decision maker, however, again, it is not intended to provide site-specific analysis. Watershed and project scale analysis will be used to inform site-specific project decisions. It is at these levels of analysis where individual roads in the project area will be identified and effects of implementing a project alternative will be analyzed and disclosed.
4-41	Public Concern: The Forest Service should conduct a meaningful analysis of the effects of road construction and maintenance on aquatic habitats.	The revised LMP is a programmatic decision. Specific decisions on roads are not made in this document. The desired condition statements for each prescription identified in Chapter 3 of the revised LMP establishes broad guidance for road management. This guidance was used in the viability analysis discussed in the EIS. Particular road guidance is displayed in the table labeled "FWRBE Prescription Attributes" found in Appendix B of the EIS. The effect of increased sediment from all sources in the watershed on aquatic species was considered in the sediment and viability models
4-42	Public Concern: The Forest Service should identify a minimum road system option as required by Forest Service Manual 7712.11.	36 CFR 212.5 requires the Forest Service to identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of NFS lands, using a science-based roads analysis at the appropriate scale. The forest-scale roads analysis was not intended to analyze the all roads (classified and unclassified) on NFS lands. There are multiple scales at which roads analysis may be conducted to inform road management decisions. Roads analysis at the forest-scale provides the context for informing road management decisions and activities at the watershed, area and project level. Outcomes of roads analysis at the watershed and area-scale would identify needed and unneeded roads (FSM 7712.13c)

4-44	Public Concern: The Forest Service should develop standards to ensure that aquatic resources are protected from damage due to increased road use and maintenance.	The revised LMP is designed to avoid and minimize effects on aquatic resources. This is ensured through direction provided in the forestwide standards and the riparian prescription (RX11).
4-46	Public Concern: The Forest Service should clarify whether or not temporary roads are included in construction estimates.	Temporary road costs are part of the costs used to determine the “stumpage value” of the timber, which is a “net” figure. So while there are no explicit temporary road costs in the analysis, they are accounted for through the reduction in the “net revenue” (or stumpage value) figure used in the economic analysis. This concern is best addressed at the project level.
4-47	Public Concern: The Forest Service should only construct new roads if no other feasible alternative exists to deal with emergency situations.	Road standards should only be established when supported by site-specific science-based analysis. Decisions on road construction, reconstruction, and decommissioning are best handled at the watershed or project level based upon site-specific information and analysis. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities for implementation.
4-50	Public Concern: The Forest Service should only consider new roads if they help in maintaining and protecting sensitive areas.	New road construction is expected to occur at very low levels under the preferred alternative. See section 23.0 of the EIS for a disclosure of the anticipated road construction program. It is not possible under a multiple use plan to limit roads to only one purpose as the commenter suggests; however, given the emphasis of the preferred alternative, what limited road construction that may occur is most likely to be motivated by recreational or wildlife habitat needs.
4-51	Public Concern: The Forest Service should acknowledge and accommodate the proposed improvement of State Route 91 to the Virginia state line.	The corridor proposed by the Tennessee Department of Transportation is too indefinite for the CNF to consider in this revision process. When a definite proposal is presented by TDOT, a site-specific analysis and project decision will be made.
4-52	Public Concern: The Forest Service should not construct additional roads.	The table labeled “Summary of Roadless Area Allocations by Category by Alternative” discloses the possibility of roads being constructed in Inventoried Roadless Areas. There is direction in the revised LMP to follow all current rules and regulations regarding maintenance of the character of any inventoried roadless area..
4-53	Public Concern: The Forest Service should institute a moratorium on the construction of new, permanent roads.	Goal 51 allows construction of new roads only where allowed by prescription and where existing roads are inadequate to meet the need.
4-54	Public Concern: The Forest Service should consider the costs of road construction for creating the desired conditions outlined in the proposed plan.	The LMP identifies the desired conditions to be achieved, and the EIS explains the projected outputs and activities needed to meet those desired conditions, along with the environmental effects of those projected outputs and activities. The commenter is correct that the Forest Service may not receive the full budget needed to carry out all the activities projected in the LMP and EIS.
4-57	Public Concern: The Forest Service should decrease the number of roads and maintain them better.	The “Desired Condition” for each prescription identified in Chapter 3 of the revised LMP contains a statement regarding road management. The desired condition statement regarding road management corresponds to the table labeled “FWRBE Prescription Attributes” located in the “Inventory and Monitoring Institute Effects Analysis Process” found in Appendix B of the EIS. This table, used in conjunction with the table labeled “Comparison of Alternatives by Prescription” found in Chapter 2 of the EIS will disclose the range of road management alternatives considered in the development of the revised LMP.
4-59	Public Concern: The Forest Service should reconstruct, relocate, and decommission roads.	Goals 49 and 50 address road decommissioning and reconstruction.
4-60	Public Concern: The Forest Service should close forest roads.	This concern is best addressed at a watershed or project decision scale rather than in Forest Planning. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities.
4-62	Public Concern: The Forest Service should obliterate more roads and restore the land.	A range of road decommissioning is identified through the range of alternatives. See the section of the EIS, Chapter 2, discussing Issue 12 – Access and Road Management, and the table labeled “Four road options would be used in the various prescription allocations ranging from unroaded interior to increase in open road density. Acres to which the four road options would be assigned vary among alternatives.” An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities.
4-66	Public Concern: The Forest Service should decommission Level 1 and Level 2 roads.	This concern is best addressed at a watershed or project decision level. An interdisciplinary science-based roads analysis at the appropriate scale will be used to inform planners and decision makers of needed and unneeded roads and to recommend priorities.
4-67	Public Concern: The Forest Service should develop objectives or standards for decommissioning roads.	Opportunities and related objectives for decommissioning roads are considered in the Roads Analysis process which was done at the national forest scale and completed before the decision was made on the Forest Land and Resource Management Plan.
4-69	Public Concern: The Forest Service should add direction to management prescriptions for deconstructing roads.	See Response to Public Concern 4-67
5-3	Public Concern: The Forest Service should provide additional protections in Management Prescription, 4.K, Roan Mountain.	The following statement was added to the desired condition description for Prescription 4.K – Roan Mountain, “ <i>Facilities are unobtrusive and subordinate to the surrounding landscape.</i> ” By definition, the RN1 classification is confined to areas within a half-mile from roads that are open to motorized traffic. RN2 and SPNM areas are located a half-mile or greater from open roads in blocks of national forest land that meet minimal size requirements i.e. 2,500 acre block. These areas are identified on the Recreation Opportunity Spectrum (ROS) inventory in the Forest’s Geographic Information System (GIS). Refer to the “Recreation Opportunity Spectrum” affected environment discussion in the EIS under “Recreation Related Programs.”
5-4	Public Concern: The Forest Service should assign the Management Prescription 12.B, Remote Backcountry Non-Motorized, to several areas on the forest.	Prescriptions are allocated to different areas in order to achieve management objectives for many resources and to reflect the management emphasis of the alternative. Acres assigned to Remote Backcountry Recreation Non-Motorized (12.B) were

		based on multiple resource needs.
5-5	Public Concern: The Forest Service should assign the Management Prescription 12.B, Remote Backcountry – Non-motorized, to compartments 40 and 41 in Johnson County.	The range of alternatives developed in the EIS represent a variety of management prescriptions allocated to the areas mentioned.
5-6	Public Concern: The Forest Service should modify various management prescriptions on the Cherokee National Forest.	The proposed boundary for Big Laurel Branch Addition (RX1B) has been modified to retain practical use of existing access routes by the Tennessee Valley Authority (TVA) and Appalachian Trail maintenance crews. Approximately 783 acres of RX1.B have been reallocated to 462 acres of RX4.A (Appalachian Trail Corridor) and 321 acres RX12.A (Remote Backcountry). See response for 5-66.c.
5-26	Public Concern: The Forest Service should assign the Management Prescription 12.B, Remote Backcountry Recreation Non-Motorized, to several areas on the forest.	See response for 5-4.
5-40	Public Concern: The Forest Service should not presume that a wilderness designation allows only recreation.	Revision of the CNF LMP follows direction in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT, PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, EFFECTIVE 8/3/92, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 - EVALUATION OF POTENTIAL WILDERNESS in evaluating potential wilderness areas. An area recommended as suitable for wilderness must meet the tests of capability, availability, and need. In addition to the inherent wilderness quality it possesses, an area must provide opportunities and experiences that are dependent upon or enhanced by a wilderness environment. Recreation is only one of many factors evaluated. Also see Appendix C - Roadless Area Evaluation in the EIS. The EIS in addressing Issue 8 - Roadless Areas and Wilderness Management discloses that wilderness, roadless and other un-roaded areas are managed to provide their full range of social and ecological benefits. The EIS further discloses that in addition to outdoor recreation in wilderness, there is a non-user component that values American wilderness. Wilderness is valued for preserving representative natural ecosystems and local landscapes. The very existence of wilderness is valued by the American public as part of the natural heritage of the country
5-41	Public Concern: The Forest Service should recognize the importance of public land recreation.	The LMP does not ignore Recreation. Direction is provided in the form of Goals, Standards and the allocation of lands to management prescriptions where a wide spectrum of recreation opportunities and settings are provided and permitted.
5-44	Public Concern: The Forest Service should close or rehabilitate recreations sites that show unacceptable damage.	The LMP goal for recreation is to provide settings and opportunities on an “environmentally sound and financially sustainable basis.” Refer to Forest-wide standards for Developed Recreation in Chapter 2 of LMP under Recreation – Developed, Dispersed, and Backcountry. Also, refer to Appendix G Monitoring Question #11, “What are the status and trends of recreation use impacts on the environment?” and EIS discussion of “Supply of Developed Recreation Sites” under “Recreation Related Programs.”
5-45	Public Concern: The Forest Service should ensure adequate access to National Forest System lands for recreation.	Access to some designated areas either by road or trail is intentionally limited to provide a spectrum of recreation settings and opportunities on the Cherokee National Forest. Refer to the “Recreation Opportunity Spectrum” affected environment discussion in the EIS under “Recreation Related Programs.” The range of alternatives developed in the EIS represent a variety of levels of recreation access including low to high increases in existing non-motorized trails. Refer to direct/indirect effects for Recreation in the EIS under “Recreation Opportunity Spectrum” and “Dispersed Recreation.” Also refer to EIS tables, “Bicycle and motorized trail closures in 1.B areas by alternative” and “Miles of interior roads to be closed in 1.B Areas by Alternative” in the “Wilderness and Roadless” section.
5-46	Public Concern: The Forest Service should stop all commercial activities on the Cherokee National Forest.	Halting all commercial activity in the CNF is beyond the scope of this revised Plan. Commercial activities are included in the intent of the Multiple Use Sustained Yield Act.
5-49	Public Concern: The Forest Service should calculate wilderness recreational capacity based on averaged values rather than peak values.	Many comments were received throughout the planning process concerning the 1997 guidance from the Region on methodologies for calculating recreational supply and demand for wilderness. This included a calculation of the “practical maximum capacity” of roadless and wilderness areas. The Region recognized the concerns with this methodology and issued a letter on March 8, 2002 which emphasized that these calculations are “theoretical” and that the “rationale for the wilderness recommendations should be based on the merits of each roadless area and the sustainability of wilderness values”. As a result, the calculations from this methodology are not included anywhere in the EIS, and they were not a determining factor in making wilderness.
5-50	Public Concern: The Forest Service should better analyze the supply and demand for wilderness based recreation.	See response to concern 6-49.
5-51	Public Concern: The Forest Service should better analyze the real price of recreational opportunities on National Forest System lands.	The most recent information available at the time of our analysis are prices expressed in 1989 dollars and estimated from 1989 to 2040 are found in the FS publication “Resource Pricing and Valuation Procedures for the Recommended 1990 RPA Program”, which is a part of the Process Record. The real price growth to year 2000 is estimated and adjusted the values to reflect 2000 prices. See the “Economic, and Local Government Impact Analysis” section of Appendix B of the CNF EIS. If revised prices are made available from Forest Service Research and Forest Service Strategic Planning and Resource Assessment Units before the Final EIS is released, these new prices will be substituted for the DEIS prices.
5-52	Public Concern: The Forest Service should not use the Practical Method Capacity method.	See response for concern 5-49.
5-53	Public Concern: The Forest Service should better document the need for recreation on National Forest System lands.	See response to concern 6-48 and 5-49.
5-54	Public Concern: The Forest Service should consider whether budget constraints will be able to support the recreation staff, law enforcement, and facilities called for by recreation demand.	The alternatives considered in the EIS all fall within likely budget levels over the life of the revised LMP. Should monitoring indicate that unexpected, or undesirable effects are occurring, management will be adjusted. Should amendments or revisions to the LMP be required, such changes would be made.
5-57	Public Concern: The Forest Service should expend greater resources on recreation trails, infrastructure, and services.	Alternative I (the selected alternative) is described in Chapter 2 of the EIS, “Alternatives considered in Detail” section. The

		theme includes the following statements: "Provide high quality nature-based recreation opportunities" and "Emphasize non-motorized settings with natural appearing landscapes" These themes are manifested throughout the management direction for the revised LMP.
5-61	Public Concern: The Forest Service should only allow ATV use in Management Prescription 7.C, OHV Use Area.	<p>Through the 7.C prescription, the LMP identifies where the management will emphasize OHV recreation. In other prescriptions, OHV recreation may not be emphasized but may be compatible. For example, a single trail or smaller trail system may already exist, or be appropriate for development, in other prescriptions. Finally, it is important to provide logical trail systems including connections between trail systems, trail heads, or points of interest. The CNF states where motorized recreation is prohibited or permitted.</p> <p>The EIS examines a range of OHV opportunities among the seven alternatives. Chapters 2 and 3 discuss, by alternative, the acres allocated to the 7C prescription and the percent of estimated change in motorized trails. See table entitled "Comparison of Alternatives by Prescription," and tables entitled "Acres of Off-Highway Vehicle Use Areas, 7.C Prescription by Alternative" and "Percent of Estimated Change in Motorized Trails by Alternative" and the corresponding narratives. See response for concern 5-66.</p>
5-62	Public Concern: The Forest Service should reconsider the proposed acreage of Management Prescription 7.C on the forest.	Based on concerns received, the CNF reconsidered the allocation of Prescription 7.C. No change to the allocation occurred based on the reconsideration. See response for 5-66.c.
5-66	Public Concern: The Forest Service should allow ATV use on National Forest System lands.	<p>OHV recreation is clearly a valid use of, as well as a frequently enjoyed activity, on NFS lands. See Executive Order 11644, as amended by Executive Order 11989, Use of Off-Road Vehicles on Public Lands, 37 FR 2877 (Feb. 9, 1972), 42 FR 26959 (May 25, 1977.) As overall strategic direction, the LMP balances recreational use and protection of resources. It emphasizes OHV recreation in certain areas. It also recognizes that OHV recreation is inappropriate for certain settings due to impacts on ecological resources or conflicts with other recreationists or designated land uses.</p> <p>This LMP provides an umbrella of direction for future site-specific developments by designating where OHV recreation may be compatible with other uses; it however does not make site-specific project decisions. Future proposals for development of OHV routes – whether new systems or additions to existing systems - would require further site-specific project analysis which would take into account potential site-specific impacts such as noise, disturbance to wildlife, erosion, invasive species and conflicts with other uses. Analysis of the proposals could solicit public comment on site-specific considerations such as location, length, use of roads, safety, vehicle types, trailheads, operational periods, and site-specific monitoring.</p> <p>Screening Criteria for New OHV Systems in Appendix J is used as part of the process identifying lands for 7.C., OHV Use Area, prescription. These criteria help evaluate the potential environmental and social conflicts. During LMP implementation, these screening criteria will be used to guide the development of OHV opportunities in compatible prescriptions. For example, the potential impact of noise associated would be examined and, if necessary, mitigation measures would be designed to reduce negative effects to an acceptable level.</p> <p>Proper program management is important to the success of OHV recreation. Partnerships with motorized recreationists, communities, forest interest groups, other law enforcement agencies and public land manager are also essential in providing information on where and how to ride. The CNF is committed to offering high quality OHV riding opportunities in a natural setting and is committed to the stewardship of NFS lands. LMP-level decisions on OHV recreation are reviewed in the annual forest plan monitoring report. Additionally, current regulations give the authority to land managers to close areas that are being adversely impacted. See 36 CFR 295, Use of Motor Vehicles Off Roads, and 36 CFR 261, Prohibitions.</p>
5-66.c	But should limit the impact of ATV activity	<p>This is a comprehensive response to many public concerns addressing OHV use and management on the Cherokee National Forest.</p> <p><i>Screening Criteria for New OHV Systems</i> in Appendix J of the LMP was used during the planning process to allocate 7.C prescription areas for the different forest plan alternatives in the EIS. Refer to EIS table, "Acres of Off-Highway Vehicle Use Areas, 7.C Prescription by Alternative" under direct/indirect effects for Dispersed Recreation.</p> <p>During implementation of the LMP, Appendix J screening criteria will be employed to evaluate any new proposed OHV areas including additional OHV trail systems, OHV access points (trailheads) and short OHV connecting routes in 7.C and other prescription areas that may allow limited OHV use. Additional ATV areas may be established through a Forest Plan amendment. Refer to 7.C Desired Condition in LMP.</p> <p>The screening criteria in Appendix J addresses the need to evaluate potential conflicts with other resource management objectives as well as existing recreation uses prior to developing new OHV opportunities. The impact of noise associated with OHV use would be considered a potential conflict with existing non-motorized recreation settings and evaluated through project level NEPA analysis. If necessary, mitigation measures would be designed to lessen potential negative effects. Each OHV trail system must have a monitoring plan prior to establishment. Refer to objectives under LMP Prescription 7.C.</p> <p>OHV use on the Forest is monitored and evaluated. Refer to LMP Forest-wide watershed standard addressing OHV use and channeled ephemeral stream zones; Appendix G Monitoring Question #11, "What are the status and trends of recreation use impacts on the environment?"; the last three paragraphs of "Cumulative effects for Recreation Related Programs" in EIS and the Prescription 7.C Desired Condition as stated in LMP.</p>
5-67	Public Concern: The Forest Service should not open up more National Forest System lands to ATV use.	See response to concern 5-66.
5-67.d	Because the Forest Service can not adequately enforce current ATV regulations.	See response for 5-66.

5-67.h	For multiple environmental reasons.	See response for 5-66.
5-67.k	To prevent damage to trail and off-trail areas	See response for 5-66.
5-67.o	But should purchase land at the Ducktown/Copperhill area	The area specified is outside the proclamation boundary of the CNF. Purchase of such lands is outside the scope of the revised LMP.
5-67.p	In the Devil's Backbone Backcountry Area	The CNF is aware of the use, and is taking steps to stop all illegal use. See response for 5-66.c.
5-67.r	In the Rogers Ridge Scenic and Backcountry Areas	See responses for 5-67 and 5-66.
5-75	Public Concern: The Forest Service should permanently close the Bullen Hollow Motorcycle Trail and Horse Creek Road to motorized use.	See responses for 5-135 and 5-66.
5-78	Public Concern: The Forest Service should provide motor vehicle access to National Forest System lands.	Refer to EIS affected environment discussion addressing demographic information under "Developed and Dispersed Recreation." See response for 5-45 related to recreation access.
5-83	Public Concern: The Forest Service should ensure that ATV trails are not placed in rare plant communities.	See the <i>Screening Criteria for New OHV Systems</i> in Appendix J of the LMP and response for 5-66.c. See response for 2-62 for response to public concern 5-80.
5-85	Public Concern: The Forest Service should allocate resources to curtail unauthorized ATV use.	See responses for 5-67.p and 5-66.c.
5-86	Public Concern: The Forest Service should designate certain areas for ATV use.	The Buffalo Mountain area is allocated to the RX7.C, which allows OHV use on specified roads and trails. See response for 5-66.c.
5-90	Public Concern: The Forest Service should enforce closures and adopt standards for building barriers to keep ATVs out of sensitive areas.	See responses for 5-67.p and 5-66.c.
5-93.c	Because the recreational and health benefits of mountain biking far outweigh the minimal impacts on the land.	See responses for 5-94 and 5-94.b.
5-94	Public Concern: The Forest Service should continue to support mountain biking activities on National Forest System lands.	Chapter 2 of the revised LMP, in the "Recreation - Developed, Dispersed and Backcountry" section identifies a goal to enhance biking opportunities. Refer to LMP Forest-wide standard for trails which states in part, "allow bikes only on designated bike trails, horse trails (unless otherwise posted), and open and closed classified roads."
5-94.b	Because mountain biking provides economic benefits to local communities.	The range of alternatives developed in Chapter 2 of the EIS represent a variety of levels of recreation access including low to high increases in existing bike trails. Refer to EIS table, "Estimated Increase in Non-Motorized Trails by Alternative" under direct/indirect effects for Dispersed Recreation and related discussion.
5-94.c	Because local mountain bikers spend many hours per year on trail maintenance, user education, and mountain bike patrols.	See responses for 5-94 and 5-94.b.
5-95	Public Concern: The Forest Service should prohibit the annual road race which takes place each year on the Cherokee National Forest near Benton, TN.	Special use activities are included in the intent of the Multiple-Use Sustained Yield Act. Such permits are issued after an application and screening process is conducted. Events are monitored and permits are not renewed if environmental or public safety concerns cannot be adequately addressed.
5-102	Public Concern: The Forest Service should support hiking activities on National Forest System lands.	Trails and other dispersed recreation activities are a large part of the overall recreation program for the Southern Appalachian National Forests. Overall, building additional trails would be compatible with the forest plans as revised. However, forest plans do not prescribe how much additional trail will be built. Adding trails to the forest will be an individual project decision based on need, type of trail, desired location and funding. Generally non-motorized trails are compatible with most prescription areas on the forest; the one exception would be bicycles in wilderness areas or recommended wilderness areas. Some prescriptions will be managed to meet a higher standard for scenic beauty which would provide some of the higher quality areas for trails, but most all prescriptions would allow for new trail development.
5-106	Public Concern: The Forest Service should better support hunting and fishing on National Forest System lands.	The revised LMP goal in Chapter 2, "Recreation- Developed, Dispersed and Backcountry" section recognizes the need to provide opportunities for hunting, fishing and wildlife viewing/nature study. The range of alternatives developed in the EIS represent a variety of management prescriptions that provide habitat for big and small game. Refer to table, "Estimated Total Acres of Big & Small Game Emphasis Areas by Alternative" under direct/indirect effects for Dispersed Recreation in the EIS. The entire Cherokee National Forest is designated as a state Wildlife Management Area in all alternatives. See response for 5-45 related to recreation access.
5-107	Public Concern: The Forest Service should provide fish and wildlife areas.	See responses for 5-106 and 5-115.
5-108	Public Concern: The Forest Service should not encourage hunting on National Forest System lands.	The range of alternatives displayed in Chapter 2 of the EIS indicates a variety of emphases of game management.
5-112	Public Concern: The Forest Service should add a season in the southeastern portion of the Cherokee National Forest for bird dog training.	This decision is outside the scope of the revised LMP. Tennessee Wildlife Resources Commission has the sole authority to regulate hunting and training season in Tennessee.
5-115	Public Concern: The Forest Service should protect fishing opportunities on National Forest System lands.	The revised CNF ensures a broad spectrum of settings and opportunities for angler recreation.
5-116	Public Concern: The Forest Service should not place fishing platforms on the portions of the Chattooga River with a Wild and Scenic River designation.	Wrong Code
5-119	Public Concern: The Forest Service should better maintain trails on the Cherokee National Forest.	Refer to objective and standards in Chapter 2 of the LMP under "Scenery." Lands viewed in the foreground and middleground from the CNF's nationally designated trails are or will be inventoried and managed according the Forest Service Scenery Management System. Refer to goal in Chapter 2 of LMP under "Recreation - Developed, Dispersed, Backcountry." Goal states in part, " Develop, enhance, and maintain systems of non-motorized and motorized trails within the capabilities of the land and appropriate to the desired ROS class." Refer to the standard in prescription 1.A, Designated Wilderness, that states, "Construct and maintain

		trails to the minimum standard necessary.” Refer to standards in prescription 11, Riparian Corridors, under “Recreation – Developed, Dispersed, and Backcountry” for language addressing trail reconstruction and relocation.
5-123	Public Concern: The Forest Service should support the GEM Trail.	<p>The demand for trails of all kinds is increasing while budgets for construction and maintenance of trails remain static or often decreases. The overall focus of each of the southern Appalachian national forests in the LMP is to work to maintain and improve current trail systems and to analyze any additional needs for trails as funding permits. Analysis of a long distance trail through the southern Appalachians was not analyzed as part of our plan revision. A long distance trail such as the Great Eastern Mountains Trail will require a separate planning effort that would tier to the LMP.</p> <p>Trail development is compatible with the LMP as are the goals to reduce congestion on the AT and provide multiple-use trail opportunities. Interested individuals should dialog with all national forests that would be affected by the GEM trails to discuss the feasibility and opportunity for success in such an ambitious endeavor.</p>
5-125	Public Concern: The Forest Service should protect the Appalachian Trail.	<p>The Forest Service is charged by the National Trails System Act (P.L. 90-543, as amended) with the protection and management of the portions of the Appalachian National Scenic Trail which are located on NFS lands and lands administratively transferred to the agency for management. Working with the other members of the cooperative management system for the AT, the agency has developed many tools to accomplish this protection and management, including the <i>Appalachian Trail Comprehensive Plan</i>, agency policy and directives, numerous memoranda of agreement, and the development of a unique management prescription for the AT in the LMP. The agency has also striven to balance the need for consistency in the management of the AT as a long-distance trail within the Southern Region with the need to respond to unique, site-specific situations. The AT corridor was designated as a unique management area in the original LMP, and that concept is continued as management prescription 4.A in the revised LMP. The Forest Service is committed to the continued protection and management of the Appalachian National Scenic Trail.</p> <p>The AT was designated as the first National Scenic Trail by the National Trails System Act (NTSA). This formal designation separates the AT from most other Forest Service trails. The NTSA also requires the conservation of the AT and the areas through which it passes. Since 1977, working with AT management partners, the Southern Region of the Forest Service has defined the corridor area associated with the AT as the foreground visual zone as defined by the current agency system for scenic resource management. Where the traditional or current route of the trail is not the optimal permanent location, the optimal location has been determined through a cooperative process, and is the basis for the trail corridor. In the original LMP, the AT corridor was designated as a unique management area with specific management direction, standards, and guidelines. In the revised LMP, the AT corridor is designated as a unique management prescription with specific management direction and standards. Effective management of the Appalachian National Scenic Trail as a long-distance hiking trail relies on the direction found in management prescription 4.A. Changing the definition of the AT corridor is outside the scope of the revised LMP.</p>
5-127	Public Concern: The Forest Service should realize that management of the Appalachian Trail violates the Federal Advisory Committee Act.	The AT was designated as the first National Scenic Trail by the National Trails System Act (NTSA). The act directs the Forest Service and the National Park Service to work cooperatively with volunteers and volunteer organizations to plan, develop, and manage nationally designated trails. Management of the AT is conducted using the cooperative management system detailed in the <i>Appalachian Trail Comprehensive Plan</i> , developed by both federal agencies as directed by the NTSA. This management is a full partnership between the Forest Service, the National Park Service, other federal and state land-managing agencies, the Appalachian Trail Conference (ATC), and the members of ATC-affiliated trail clubs. The NTSA, the <i>A.T. Comprehensive Plan</i> , and existing agreements between the trail-management partners recognize the need to manage both the actual trail treadway and the lands around the treadway to protect trail values and resources, and provide for the enjoyment of trail users. The management of the AT using the cooperative management system does not violate the Federal Advisory Committee Act (FACA) or the National Trails System Act. Public participation is provided for by the scoping process of the National Environmental Policy Act (NEPA) for specific trail-related projects, and by the public comment process of the revised LMP.
5-128	Public Concern: The Forest Service should realize that management of the Appalachian Trail violates the National Trails System Act of 1968.	See response to concern 5-127.
5-130	Public Concern: The Forest Service should not incorporate the “Implementation Guide for the Appalachian Trail” into the forest plan.	Management direction in the 1986 LMP included both standards and guidelines for management actions. Current regional agency practice is to include only management direction meeting the definition of a standard in the revised LMP. (Standards are specific resource management directions and often preclude or impose limitations on management activities or resource uses, generally for environmental protection, public safety, or to resolve an issue.) Some items were suggested during the planning process that are essentially the “how to’s” of implementing the LMP. These guides for implementation may take the form of field guides or handbooks and will be kept separate from the revised LMP.
5-131	Public Concern: The Forest Service should segregate and disperse multi-use trail systems away from the Appalachian Trail.	<p>Refer to Forest-wide goal for trails under “Recreation – Developed, Dispersed, Backcountry.” The goal states in part, “Emphasize multi-use non-motorized trails where appropriate and where user conflict can be minimized. Provide separate-use trails where necessary to reduce user conflicts or to improve the quality of recreation experience.”</p> <p>The AT is recognized as solely a foot trail, and standards in the 4.A management prescription prohibit motorized (including ATV), horse, pack stock, and bicycle use of the AT. Multiple-use trails within the 4.A prescription area, including crossings of the AT, may only be authorized when, in coordination with AT management partners, the Forest Service determines that such trails will not cause impacts or conflicts with the AT.</p>
5-132	Public Concern: The Forest Service should update maps related to the Appalachian Trail in Alternative I.	Maps can never be completely accurate, and are revised as conditions change, including land acquisition and trail relocations. The boundary of the 4.A. management prescription is the foreground zone as defined by the Scenery Management System and

		mapped from the AT treadway. Field verifications and corrections are expected to occur in response to specific project proposals throughout the life of the revised LMP.
5-133	Public Concern: The Forest Service should correct some of the maps related to the Appalachian Trail.	See response for 5-132.
5-135	Public Concern: The Forest Service should close the Bullen Hollow Motorcycle Road and the Horse Creek Road as these roads adversely impact the Appalachian Trail.	<p>In Alternatives A and E the Bullen Hollow Motorcycle Trail (FS Trail #2, 4.9 miles) and Horse Creek Road (Coldspring Mountain Road #94, 4.75 miles) were allocated to prescriptions that do not allow motorized access. Consequently, the two routes would be closed to motorized use under these Alternatives.</p> <p>Under Alternative I (the selected alternative) the two routes are allocated to a prescription that retains some motorized access. Horse Creek Road is a classified Forest Service road. As per Forest-wide standard in Chapter 2 of LMP, OHV use on all roads under FS jurisdiction that are open (ML 2-5) is limited to vehicles and operators that are in compliance with motor vehicle laws of the state. Unlicensed OHV's are restricted to routes (roads and trails) specifically designated as open to such vehicles. Exceptions may be made at the discretion of the District Ranger for special events such as the traditional Decoration Day.</p> <p>See response 5-66 concerning compatibility of OHV trails and nearby non-motorized trails such as the Appalachian Trail.</p> <p>See response for 5-67 concerning illegal use.</p>
5-137	Public Concern: The Forest Service should limit the impact of the Appalachian Trail on surrounding land uses.	Since 1977, the Southern Region of the Forest Service has defined the corridor area associated with the Appalachian National Scenic Trail as the foreground visual zone as defined by the current agency system for scenic resource management. This definition results in a management prescription area of varying width based on the actual seen area from the AT. Within this management prescription, management activities are designed to emphasize and complement the AT experience. This definition, and the management direction and standards which apply within the prescription area, is appropriate for a Congressionally-designated National Scenic Trail, and serves as an effective and quantifiable limit for the AT management prescription and adjacent management prescription areas.
5-143	Public Concern: The Forest Service should include language regarding management of the Appalachian Trail in certain other prescriptions.	This comment identifies several specific areas on the revised LMP maps where the AT management prescription area (4.A) is imbedded within another management prescription. In these cases, where prescription area 4.A is not delineated on the map, a standard linking to prescription area 4.A is included in the management direction to ensure that any proposed activities are compatible with both management prescription areas.
5-146	Public Concern: The Forest Service should assign various Management Prescriptions to various areas on the Appalachian Trail.	<p>This comment includes a number of specific responses from multiple publics for specific alterations to areas encompassing the AT as mapped for the proposed LMP. These comments have been reviewed and revisions made where appropriate.</p> <p>See response for 5-66.c for OHV related concerns and 5-143 regarding management of the A.T. corridor in prescriptions through which the trail passes. The A.T. foreground corridor was allocated to a mix of prescriptions for each alternative in the EIS. The potential "Direct/Indirect Effects" to the A.T. corridor are disclosed under "Special Areas" in Chapter 3 of EIS. See response for 5-132 for A.T. mapping concerns.</p>
5-155	Public Concern: The Forest Service should modify the language addressing lands and special uses for the Appalachian Trail.	Several comments were received concerning the section of management prescription 4.A. dealing with Lands and Special Uses in the Appalachian National Scenic Trail Corridor. Extensive discussions involving the Forests, Regional Office, and trail management partners based on these comments have resulted in revisions to several of the standards within this section to more clearly describe the appropriateness and limitations on special-uses authorizations within the Appalachian National Scenic Trail Corridor, and to maintain consistency between Forests. Please refer to the Land and Special Uses section of management prescription 4.A in the revised LMP for these revisions.
5-165	Public Concern: The Forest Service should not rely on gravel roads to provide trails for equestrian use.	<p>The CNF transportation system consists of a variety of roads. Roads are defined as "a motor vehicle travelway over 50 inches wide, unless designated and managed as a trail". Classified roads are defined as "roads wholly or partially within or adjacent to NFS lands that are determined to be needed for long-term motor vehicle access, including state roads, county roads, privately owned roads, NFS roads, and other roads authorized by the Forest Service (36 CFR 212.1)."</p> <p>These roads are divided into functional classes depending on whether they act as arterial, collector or local roads. Each road is then assigned a maintenance level. Maintenance levels 2-3 are roads maintained for high clearance vehicles or for passenger vehicles where the surface is not smooth. Maintenance level 4 is for passenger vehicles with a smooth surface and maintenance level 5 roads are designed to be smooth and dust free, and may be paved surfaces.</p> <p>The LMP restricts horses to trails designated for horse use and classified roads equally to all users. Roads are not a substitute for well designed and planned horse trails, however they do provide additional opportunities to enjoy the national forests on horseback and help meet some of the rapidly escalating demand for horseback riding opportunities. The CNF has many miles of roads, particularly maintenance level 2-3 roads that generally are narrower in width with surfaces that are more difficult for vehicles and have generally slower vehicle traffic. Some of these are graveled roads, however surface type often depends on the native materials in the area. Many of these are barely over the 50-inch definition and provide canopied and attractive travel corridors.</p> <p>The LMP direction provides a balance between protecting the environment and providing horseback riding opportunities. Restricting horses to designate trails and classified roads will reduce the number of user created trails that are contributing to soil loss and degraded water quality. Additionally, it should help clear up confusion about where it is legal to ride, e.g. only on numbered roads and designated trails. By allowing horses to ride classified roads, people living adjacent to national forest will still be able to ride into the forest and have access to the designated trail system as well as the road system. Horseback riders riding on the road system will be encouraged to be safe and realize that they may encounter motor vehicles if they choose to</p>

		ride on classified roads.
5-166	Public Concern: The Forest Service should increase partnerships to deal with equestrian issues.	Trails and other dispersed recreation activities are a large part of the overall recreation program for the southern Appalachian national forests. Overall, building additional trails would be compatible with the LMP as revised. However, the LMP does not prescribe how much additional trail will be built. Adding trails to the CNF will be an individual project decision based on need, type of trail, desired location and funding. The Forest Service is always seeking to develop partnerships to deal with all resource issues.
5-167	Public Concern: The Forest Service should use local volunteers to help support equestrian use on National Forest System lands.	The use of the volunteer program is one of the main stays the Forest Service uses in providing services to the public. In particular, it is the local volunteers that make much of the recreation available to the public. Local volunteers to help in managing and supporting equestrian use are welcome.
5-175	Public Concern: The Forest Service should not restrict equestrian use in permanent wildlife openings (FW-105).	Refer to revised Forest-wide trail standards in LMP. Equestrian use is allowed in permanent wildlife openings unless otherwise posted.
5-176	Public Concern: The Forest Service should consider the impact of equestrian regulations on individuals living adjacent to National Forest System lands.	See response for 5-165.
5-177	Public Concern: The Forest Service should only permit animals in streams at designated stream crossings.	Equestrian use of CNF has been addressed in the LMP and EIS. Standards have been established to help manage impacts associated with equestrian use including those related to stream crossings and water quality. Refer to the forest-wide standard in Chapter 2 of LMP under "Recreation – Developed, Dispersed, and Backcountry" that addresses equestrian use. Areas may be posted "closed" to protect or maintain water improvements. Refer to Prescription 11 in Chapter 3 of LMP for additional standards related to stream crossings and horse use under "Recreation – Developed, Dispersed and Backcountry
5-180	Public Concern: The Forest Service should not limit equestrian use to only designated trails.	See response to concern 5-165.
5-180.m	But rather should identify those areas of concern and deal with them on a site-specific basis	Refer to revised Forest wide trail standards in LMP. Equestrian use is allowed on all designated trails and open and classified roads unless otherwise posted to protect maintained wildlife openings, soil & water improvements, etc.
5-185	Public Concern: The Forest Service should allow commercial kayak training and guiding on the Tellico River.	Based on concerns received, the CNF reconsidered the current direction to manage whitewater use of the Tellico River for non-commercial recreation only. After deliberation, the decision was made to retain the standard in Alternative I, "No whitewater outfitter/guide special use permits on the Tellico River will be issued." See response for 5-187.
5-186	Public Concern: The Forest Service should limit commercial activity on the Tellico River.	See responses for 5-185 and 5-187.
5-187	Public Concern: The Forest Service should analyze the recreational experience objectives for the Tellico River and various limits of acceptable change and effects as they relate to limited instructional outfitting levels on the Tellico River.	Refer to "Alternatives Considered in Detail" in Chapter 2 of EIS. Commercial recreation is emphasized in Alternative A. Also, refer to the "Direct/Indirect Effects in the Chapter 3 of the EIS under "Developed and Dispersed Recreation" including the section addressing "River Access," which states, "In general, Alternative A would promote development and expansion of sites on the most popular rivers such as the ...Tellico. These sites would be further developed to attract and facilitate additional day-use to boost local economies. Alternatives E and I would focus facility improvements primarily on public health, safety and accessibility concerns." Alternative I is the selected Alternative. An objective under "Wilderness, Roadless Areas, Wild & Scenic Rivers" in Chapter 2 of the LMP states that a suitability study for the Tellico River should be completed during the 10 year period. If the study determines that the Tellico River is suitable and designated by Congress, a more comprehensive management plan would be developed specifically for the Tellico River. See Chapter 3 of EIS under "Wild and Scenic Rivers" and Appendix D of the EIS for additional process information. See response for 5-185.
5-217	Public Concern: The Forest Service should ensure bear-proof food storage systems and garbage containers are provided in concentrated use areas.	See CNF revised LMP, Chapter 2, "Recreation – Developed, Dispersed, and Backcountry" section goals and objectives, and Chapter 3, RX8.C for direction in managing wildlife access to human food and trash.
5-219	Public Concern: The Forest Service should inform special use permittees of impending timber harvest activities.	The CNF attempts to inform interested parties of all proposed activities.
5-221	Public Concern: The Forest Service should implement trail user fees to support trails.	The LMP does not address, promote, or prohibit charging fees for recreation.
5-224	Public Concern: The Forest Service should establish a visual corridor for the Benton Mackaye, Bartram, and Pinhoti Trails.	See Forest-wide standards in Chapter 2 under "Scenery." In mapping the inventory of the scenic resource, primary trails, which the Benton Mackaye, Bartram, and Pinhoti Trails would be, are assigned high concern levels and the trails are used to map the seen areas from these trails. The foreground, middle ground, and background area that is viewed from these trails would be assigned a higher scenic value than areas not having a high concern level, thus establishing a greater need for visual protection. A matrix is then used to assign Scenic Classes or their relative scenic value to the public to these areas. The LMP uses this inventory along with the other resource management inventories to assign the scenic management direction, Scenic Integrity Objectives, for the trails and surrounding areas. This process allows for the scenic protection of these trails.
6-3	Public Concern: The Forest Service should improve the roadless area plan by including more areas for scenic and backcountry recreation/non-motorized use.	Approximately 162,000 acres are allocated to prescriptions that support scenic and backcountry <i>non-motorized</i> recreation, including Rxs 1A, 1B, 4A and 12B, an acreage allocation significantly above the 85,195 inventoried acres of Forest Roadless Areas. Other prescriptions that support scenic and backcountry recreation <i>with some motorized components</i> include 2B 1-3, 4F, 4K, 7A, 7B and 12A, for an additional 105,000 acres. These acres total approximately 40% of the entire Cherokee National Forest.
6-4	Public Concern: The Forest Service should comply with its own documentation of which prescriptions are compatible with maintaining roadless character.	The prescriptions that protect the roadless character vary by southern Appalachian national forest LMP. Each national forest may add restrictions that would restrict certain actions to a general prescription that would protect roadless character where the generic prescription would not. As a result one prescription that protects roadless character in one LMP may not protect roadless character in another national forest LMP. While all southern Appalachian national forest LMPs or EISs do not list

		which prescriptions are compatible, each LMP or EIS does show acres or percent of acres that have their roadless character protected.
6-6	Public Concern: The Forest Service should list prescriptions considered roadless compatible.	See response to concern 6-4.
6-7	Public Concern: The Forest Service should clarify whether specific management prescriptions maintain roadless character.	It is not practical to provide the requested information. For example, in Prescription 7.E.2, a prescription that is suitable for timber management and allows road construction. A portion of a roadless area is allocated to this prescription. However, a forestwide goal (Chapter 2 revised LMP, Wilderness and Roadless section) states that all roadless areas will be managed in compliance with regulations concerning such areas.
6-8	Public Concern: The Forest Service should ensure that management direction is consistent with the Roadless Area Conservation Rule.	On July 14, 2003, a Federal District Court Judge permanently enjoined the 2000 Roadless Area Conservation Rule. Should this decision be overturned through further court proceedings, and the RACR go into effect, then the direction from this Rule would supercede LMP direction. Additionally, should the RACR go into effect, it would not require an amendment or revision of the LMP (36 CFR 294.14(b)). In terms of the LMP being consistent with the RACR, in the selected alternative, 97% of the roadless areas would have their roadless characteristics maintained and 100% of the roadless areas would be consistent with the RACR. The Record of Decision documents where management would be inconsistent with the RACR.
6-9	Public Concern: The Forest Service should follow regional guidance regarding roadless inventories.	There are three steps to determining what lands to recommend for wilderness designation. The first step is described in FSH 1909.12, Chapter 7.1, which states that, "The first step in the evaluation of potential wilderness is to identify and inventory all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act." This involves using the criteria in FSH 1909.12, Chapter 7.1 to identify those "roadless" areas. The region also issued guidance in 1995 to provide some consistency on how to interpret that direction. Once the areas meeting the criteria are identified, the next step is to "evaluate" these areas to determine their "suitability" for wilderness recommendations. As is stated in FSH 1909.12, Chapter 7.2, "An area recommended as suitable for wilderness must meet the tests of capability, availability and need." The region also issued guidance in 1997 to provide some consistency on how to interpret the direction in FSH 1909.12, Chapter 7.2 on "evaluating" the roadless areas. The last step is during the development of the forest plan alternatives where the effects of recommending or not recommending the roadless areas for wilderness designation are analyzed and documented in the environmental impact statement. The CNF followed these three steps. (See also the responses to concerns 6-26, 6-29, and 6-66.
6-11	Public Concern: The Forest Service should more adequately protect roadless areas.	See responses for 6-9 and 6-26.
6-11.c	To defend against OHV damage.	In addition to inventoried Roadless Areas, almost 77,000 additional Forest acres are allocated to Rx's with non-motorized emphasis. The Forest's 18 Roadless Areas (85,195 acres in CNF and 2,366 in adjacent forests) contain approximately 34 miles of existing improved roads; 4-wheeled off-highway vehicles that are not street-legal are not allowed in any of the inventoried Roadless Areas except on a motorcycle trail in Bald River Gorge Addition and on two roads and a trail in Bald Mountain. In the prescriptions to which Roadless acreages were allocated, none allow road construction except 4F (with restrictions in MA 8, 12 and 15) and 7E2; therefore, roadless character is maintained in most of these areas.
6-11.d	And spend available funds on restoration	The Roadless Area Conservation Rule places restrictions on the road construction and timber harvesting in inventoried Roadless Areas, and the roadless character is maintained by management prescriptions.
6-11.f	Because roadless areas provide many recreational and ecological benefits	More than 20,000 Roadless acres (7 areas) have been recommended for Wilderness Study, and will be managed to protect their wilderness characteristics pending designation through Congressional legislation. Also see response 6-11.c.
6-14	Public Concern: The Forest Service should provide more information on roadless areas under consideration for wilderness as required by NEPA.	Appendix C of the EIS provides information about each roadless area. Chapter 3 of the EIS, under the section on Roadless Areas provides information about how each roadless area will be managed in each alternative. Chapter 2, in the Comparisons of Alternatives, section provides a table that compares the acres recommended for wilderness designation by each alternative and the acres that would maintain their roadless characteristics by alternative, along with a table that identifies which roadless areas are recommended for wilderness designation by each alternative. Lastly, the Record of Decision provides the rationale for why the roadless areas were or were not recommended for wilderness designation in the selected alternative.
6-15	Public Concern: The Forest Service should act in accordance with the roadless policy.	Regional Forester's 1920 letter of May 19, 1995 gave guidance on determining if a road should be considered improved or unimproved for the roadless inventory. The CNF followed this guidance. "Description of an "Improved" Road An improved road has a definable, constructed cross-section, is properly drained, may or may not be surfaced, and is useable by most vehicle types. Some roads may only be useable by high clearance vehicles. It is also stable for the predominant traffic during the normal use season. All roads assigned a Maintenance Level of 3, 4, or 5 in the Forest Development Transportation Plan are improved roads maintained for travel by standard passenger cars. Maintenance Level 1 (roads closed to vehicle use for one year or longer) and Maintenance Level 2 (roads maintained for high clearance vehicles such as pick-ups, 4x4's, etc.) are "improved roads" if they meet the above description. Description of an "Unimproved" (or "Non-Improved") Road Maintenance Level 1 and 2 roads are "unimproved" roads if they do not have a definable, constructed cross-section, but rather were developed through use. They would have no surfacing or improved drainage structures. They may not be stable under some traffic or weather conditions during the normal use season. Their primary use is by high-clearance vehicles, but some

		<p>roads may be used by most vehicle types.</p> <p>Further Clarification on the Differences Between Improved and Unimproved Roads</p> <p>The determination as to whether a road is "improved" or "unimproved" is an area where a certain amount of flexibility was contemplated. For the Maintenance Level 1 and 2 roads, the actual conditions of the road are what make the determination as to whether or not it is an "improved" or "unimproved" road. The major points are:</p> <ul style="list-style-type: none"> -Maintenance Level 2 roads can be improved roads, even if only suitable for high-clearance vehicles. This is in keeping with our position that "standard passenger-type vehicles" (FSH 1909.12, 7.11-3) encompasses all types of street-legal vehicles. However, if a Maintenance Level 2 road: a) is not currently being maintained for these; b) does not have a definable, constructed cross-section; and c) is not stable during normal traffic and weather conditions, then it is an unimproved road. -Maintenance Level 1 roads are not maintained for any vehicular use. Consequently, it is our expectation that many of these roads are unimproved. However, it is the function and appearance of these roads that are the key points to consider in making a determination if it is an improved or unimproved road. <p>Additional Information to Consider</p> <ul style="list-style-type: none"> -Consider all forest roads; not just those on TIS (the Transportation Inventory System). The road inventory status has nothing to do with the decision on how a roadless area is affected. The deciding factors are jurisdiction (FS versus Other) of the road and whether the road is improved or unimproved. -A road that is permanently closed and managed as a wildlife opening is not a road. -If the long-term intent is to maintain a road for access, but it is currently mowed as a wildlife opening, it is an improved road. -A road is maintained for vehicle travel if there is scheduled maintenance on a specified timeframe. (If a road is currently closed as a result of storm damage, but the long-term intent is to open the road and maintain its use, then the road is still viewed as being "maintained for travel".) -A temporary road that is permanently closed and not maintained is not an improved road, regardless of how it looks. Temporary roads are not managed as roads after their time period for use has elapsed and are not a part of the road inventory. -If a road is under the jurisdiction of a State or County, it cannot be included in a roadless area, no matter whether the road is improved or unimproved. If the jurisdiction of a road is uncertain and the road is located on NFS land, then assume that the Forest Service has jurisdiction. A road with a prescriptive right is assumed to be a State or County road. -Relative to the road-density criterion, there is no restriction on the number of miles of unimproved roads that can be in a roadless area. This may, however, affect some of the other criteria. -A gated road is not a closed road, but is a restricted road. A gated road usually has some traffic during the year, even if only administrative. Whether a gated road is an improved or unimproved road will depend upon the actual conditions of the road. -If a road bisects an area under consideration as being roadless which causes the road miles to exceed the 1/2-mile road per 1,000-acre criteria, if it is appropriate and logical, the area should be separated into 2 areas and then each area evaluated for its roadless characteristics.
6-16	Public Concern: The Forest Service should protect all inventoried roadless areas on the forest.	See 6-11.d and 6-11.f. Appendix C of the EIS describes all of the Forest's inventoried Roadless Areas.
6-17	Public Concern: The Forest Service should place all unroaded areas into protective management.	There is no requirement to place all unroaded areas into protective management. See response to concern 1-29 and 6-8. For some roadless acres, it may be determined that there are some resource management needs that are not compatible with "protective management". FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 EVALUATION OF POTENTIAL WILDERNESS gives direction to carefully evaluate the potential addition of roadless areas to the National Wilderness Preservation System to determine the mix of land and resource uses that best meet public needs. Some areas are allotted status as a roadless area, some are not.
6-20	Public Concern: The Forest Service should not use a standard of 2,500 core acres for protecting roadless values.	<p>One of the critical issues identified during CNF review of the roadless inventory concerned the criterion from Forest Service Handbook 1909.12 (7.11b) requiring that a roadless area be "conducive to the perpetuation of wilderness values." The 1964 Wilderness Act defines a number of wilderness values. Among these values, Section 2 of the Act states that wildernesses must have "outstanding opportunities for solitude and a primitive and unconfined type of recreation." In an attempt to quantify this criterion, use of the Recreation Opportunity Spectrum (ROS) and the semi-primitive class of lands is recommended. As defined in the 1986 ROS book, recreationists in areas inventoried as semi-primitive have a high to moderate "probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance...in an environment that offers challenge and risk." Based on this definition, semi-primitive lands were identified as the lands that best satisfied the solitude qualities of roadless areas. Therefore, it is desirable for the "core" of a roadless area to meet the conditions of a semi-primitive non-motorized or semi-primitive motorized ROS classification. (Generally, there are very few areas in the southern U.S. that qualify under the "primitive" ROS classification.) Since the ROS book states that semi-primitive areas contain at least 2,500 acres (unless they are contiguous to primitive class lands) this 2,500-acre minimum size can be used as a screen to evaluate areas identified and mapped by either the forest or the public. This 2,500-acre screen does not apply to additions to existing wildernesses. However, it is important to recognize that this 2,500-acre semi-primitive "core" size is not an absolute minimum. It is only a screen and as such is only used as a guide</p> <p>Some areas above or below this size may or may not provide solitude. For areas such as these, a review of topography, proximity to type and use of roads, population centers and other sights and sounds of human activity determines if solitude and</p>

		primitive and unconfined recreation could be experienced. This is a professional judgment based on knowledge of the area. See response to concerns 6-51 and 6-26 for additional comments.
6-21	Public Concern: The Forest Service should not exceed the intended purposes and limits of “semi-primitive core” in eliminating areas from roadless protection.	The Recreation Opportunity Spectrum (ROS) in defining its remoteness criteria establishes criteria for semi-primitive recreation settings. Areas that are at least ½ mile but not farther than 3 miles from all roads qualify as Semi-primitive Non-Motorized and areas that are within ½ mile of primitive roads but not closer than ½ mile from better than primitive roads qualify as Semi-Primitive Motorized. This was used as a guide in delineating the areas that have outstanding opportunities for solitude and a primitive and unconfined type of recreation and thus would be considered as a roadless area. See response to concern 6.20 for additional comments.
6-22	Public Concern: The Forest Service should not recommend additional Roadless Areas.	The Forest Service is directed by the Code of Federal Regulations to evaluate and consider roadless lands for wilderness. 36 Code of Federal Regulations (CFR), 219.17 Evaluation of Roadless Areas, directs the Forest Service, unless stated differently by law, to evaluate and consider roadless areas for recommendation as potential wilderness areas during the forest planning process. Roadless areas include previous inventoried roadless areas which remain essentially roadless and undeveloped, and have not been designated as wilderness or designated to not be considered for wilderness by law, and other essentially roadless areas at the discretion of the Forest Supervisor. The Forest Service is directed by the Forest Service Handbook to identify any additional roadless areas. FH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1 EFFECTIVE 8/3/92, CHAPTER 7 - WILDERNESS EVALUATION, 7.1 - INVENTORY OF POTENTIAL WILDERNESS directs that the first step in the evaluation of potential wilderness is to identify and inventory all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act (chapter 9).
6-22.a	Including the Sampson Mountain area on the Cherokee National Forest	Sampson Mountain Addition is one of the Forest’s 18 inventoried Roadless areas and is prescribed as a Wilderness Study Area in Alternatives I, E and G. All or portions of this area were considered for other prescriptions in Alternatives A, B and D. We understand that proponents of active wildlife/fisheries and timber management and prescribed fire have a stake in this perspective and have considered these options in other alternatives.
6-22.b	Including the Big Laurel Branch on the Cherokee National Forest	Big Laurel Branch Addition is one of the Forest’s 18 inventoried Roadless areas; its management prescriptions have been altered in the rolling Alternative I to include acres in 4A and 12A. TVA powerline access and effects to private inholdings are discussed in EIS Appendix C. This area was considered for other management options in Alternatives B and D.
6-26	Public Concern: The Forest Service should use proper criteria and methods in conducting roadless area inventories.	The evaluation process for the Roadless Inventory follows FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation, and the July 22, 1997, letter on the Southern Region’s Guidance to FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation. This guidance was developed at the request of the national forests to define terms in the FSH 1909.12, Chapter 7 and Chapter 4.19c that were vague so that evaluations would be consistent in evaluating roadless areas.
6-27	Public Concern: The Forest Service should eliminate the “sights and sounds” criteria in determining areas suitable for the roadless inventory.	The CNF revision of the LMP follows direction provided in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, EFFECTIVE 8/3/92, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 - EVALUATION OF POTENTIAL WILDERNESS, which gives direction on evaluation of potential wilderness. One such item given for consideration is the ability to manage the area as wilderness. This is described as the degree to which the area contains the basic characteristics that make it suitable for wilderness designation without regard to its availability for or need as wilderness. One of the principal wilderness characteristics given to consider is manageability and to specifically evaluate how boundaries affect manageability of an area. Boundaries, to the extent practicable, act as a shield to protect the wilderness environment inside the boundary from the sights and sounds of civilization outside the wilderness. If the sights and sounds of civilization are determined to be important, they must be described. It is proper to not consider lands that do not meet the test for capability. See response to concern 6.26 for additional comments.
6-29	Public Concern: The Forest Service should remove regionally added restrictions on roadless inventory.	See response to concern 6-26.
6-30	Public Concern: The Forest Service should cite the regulatory or statutory basis for the idiosyncratic delineation of roadless areas on the Andrew Pickens Ranger District.	District is not located on the CNF. See response to concern 6-26.
6-34	Public Concern: The Forest Service should designate Wilderness or Wilderness Study Areas in all ecological units on the forest.	The revision of the CNF LMP follows direction in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 - EVALUATION OF POTENTIAL WILDERNESS, 7.23 – Need, 7.23b – Factors, 6. in determining which ecosystem unit to recommend for wilderness. The July 22, 1997, letter on the Southern Region’s Guidance to FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation states that the discussions of ecosystem section and subsections should be included. Appendix C of the EIS discloses the ecosystem section and subsection where each roadless area is located and if it would fill any void in representation. This is used to help determine the need for an area to be allocated to wilderness. Some sections or subsections had no lands that qualified for wilderness study.
6-35	Public Concern: The Forest Service should document the relative wilderness representation by ecological province, section and subsection.	Appendix C, Evaluation of Roadless Areas, of the EIS discloses if the roadless area is represented by an existing wilderness with its ecological province and section and subsection, which establishes the need for representation by a wilderness.
6-36	Public Concern: The Forest Service should make critical wilderness information more accessible.	Issue 8, Roadless Areas and Wilderness Management in the EIS, table 2.10 and 2.11 display areas recommended for

		Wilderness Study Areas
6-38	Public Concern: The Forest Service should provide Congress with a sufficient array of wilderness options to achieve Wilderness Act goals.	<p>The CNF conducted a roadless area analysis and subsequent wilderness evaluations on the roadless areas according to FSH 1909.12,7.</p> <p>The first step in the evaluation of potential wilderness is to identify and inventory all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act (ch. 9). Section 2(c) defines wilderness as, “(...in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” The wilderness areas recommended within each of the forest plans are based on analysis and discussion of the demand and need for additional wilderness areas.</p> <p>Approximately 12% of the total number of wilderness areas designated in the United States are located in the Forest Service's Southern Region. These 12% cover a wide variety of ecosystem types. Forty-nine percent of the wilderness areas recommended in the Southern Appalachian Assessment are being recommended for wilderness study. These 49%, designated as wilderness, will help to further implement the goals of the Wilderness Acts.</p>
6-39	Public Concern: The Forest Service should address wilderness recommendations on a regional basis.	Lands are evaluated from a regional perspective as part of the evaluation for recommendation for wilderness study as part of the Southern Appalachian Assessment. The study was done at the same time by all southern Appalachian national forests. Also the criteria that is used for assessment directs the Forest Service to use a regional perspective. For example, rare community types, total lands allocated to ecosystem section and subsection, wilderness proximity to population centers are evaluated. See response to concern 6.26 for additional comments.
6-41	Public Concern: The Forest Service should better document wilderness supply versus demand.	See response to concern 6-48 and 5-49.
6-42	Public Concern: The Forest Service should include a wilderness supply and demand analysis in the DEIS.	See response to concern 6-48 and 5-49.
6-43	Public Concern: The Forest Service should conduct a more detailed analysis prior to recommending wilderness or wilderness study areas.	See response to concerns 6-22 and 6-67.
6-44	Public Concern: The Forest Service should determine the need for wilderness through an analysis of the local and national distribution of wilderness.	See response to concern 6-39.
6-45	Public Concern: The Forest Service should analyze wilderness capability, availability, and need as specified in the National Forest Management Act regulations.	See response to concern 6-48 and 5-49.
6-46	Public Concern: The Forest Service should adequately explain the rationale for not recommending areas for wilderness.	Published inventories of each Roadless area (Appendix C, EIS) disclose various factors for weighing Wilderness capability, availability and need, and an array of alternative recommendations for Wilderness is presented in the EIS. Also refer to responses in 6-3 and 6.11c.
6-47	Public Concern: The Forest Service should clarify the criteria used in determining wilderness recommendations.	All of CNF's Roadless areas adjacent to existing Wilderness were prescribed as Wilderness Study Areas in Alternative I, with two exceptions: Bald River Gorge Addition, actually in a separate watershed from Bald River, was prescribed as Rx 12B, and Big Laurel Branch Addition prescription has been changed to include Rxs 4A and 12A in response to comments. CNF prescribed a stand alone Wilderness Study Area, Upper Bald River, based, in part, on its proximity to Bald River Gorge Wilderness. This Forest's Roadless inventory was established through study and public input in 1995; the evaluations were drafted in 1998 and updated in 2002. Alternatives G, E, A and I proposed the most acreage in Rx 1B; the rolling Alternative I maintains Roadless character in 97% of inventoried Roadless acreage. Also refer to description of Alternatives in Chapter 2, EIS. See response for concerns 6-48 and 5-49.
6-48	Public Concern: The Forest Service should gather accurate wilderness demand baseline data.	<p>Many comments were received throughout the planning process concerning the 1997 guidance from the Southern Region on methodologies for calculating recreational supply and demand for wilderness. This included a calculation of the “practical maximum capacity” of roadless and wilderness areas. The Southern Region recognized the concerns with this methodology and issued a letter on March 8, 2002 which emphasized that these calculations are “theoretical” and that the “rationale for the wilderness recommendations should be based on the merits of each roadless area and the sustainability of wilderness values”.</p> <p>As a result, the calculations from this methodology are not included anywhere in the EIS, and they were not a determining factor in making wilderness recommendations. What were determining factors were the factors identified in the Forest Service Handbook at FSH 1909.12, Chapter 7.23b. These factors are:</p> <ul style="list-style-type: none"> The location, size, and type of other wildernesses in the general vicinity and their distance from the proposed area, Present visitor pressure on other wildernesses, The extent to which nonwilderness lands provide opportunities for unconfined outdoor recreation experiences, The habitat needs of certain biotic species (those that need “protected areas” or those that cannot survive in “primitive surroundings”), and

		<p>An area's ability to provide for preservation of identifiable landform types and ecosystems.</p> <p>The answers to some of these factors are in the individual roadless area descriptions found in Appendix C. However, for some of the other factors within a particular National Forest, the answers were essentially the same for each roadless area. In these cases, an overall assessment of the "need" for wilderness on a National Forest was summarized in the EIS. The Record of Decision then provides the rationale for why certain roadless areas were or were not recommended for wilderness designation.</p>
6-49	Public Concern: The Forest Service should not use a formulaic process in evaluating potential wilderness areas.	The Forest Service Handbook at FSH 1909.12, Chapter 4.19c and Chapter 7.2 identify the factors to use in evaluating potential wilderness areas. The Southern Region also issued guidance in 1997 to provide some consistency on how to interpret the direction in FSH 1909.12, Chapter 7.2 and 4.19c. The CNF then used this direction and guidance for its evaluations. (See also the response to concern 6-67.)
6-50	Public Concern: The Forest Service should not use regional guidance as rigid proclamations when recommending wilderness.	The commenter references FSH 1909.12, Chapter 7.21,1 of the evaluation criteria, but does not recognize that Chapter 7.21a – Additional Capability Characteristics for Areas in the East, is also applicable. Under Chapter 7.21a, it states "National Forests east of the 100 th meridian may contain limited nonconforming uses and/or nonconforming structures and improvements while retaining capability for wilderness designation.
6-51	Public Concern: The Forest Service should clarify the use of "solitude" as a definitive criterion in the delineation of potential wilderness areas.	<p>According to the 1964 Wilderness Act, an area of wilderness is defined to have "at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition." According to FSH 1909.12, Chapter 7, while the 5,000 acre limit is a specific criterion (with some exceptions) for lands in the Western U.S., for the Eastern U.S. because of landownership patterns, the 5,000 acre limit is not applicable. Therefore, some guidance is needed on how to determine that an area "is of sufficient size as to make practicable its preservation and use in an unimpaired condition". In attempting to provide that guidance, the other provisions of the Wilderness Act definitions need to be considered, including the criterion that an area needs to have "outstanding opportunities for solitude or a primitive and unconfined type of recreation" (Section 2(c)). In attempting to identify these areas, the only non-subjective inventory of acres with these characteristics that is available, is from the Recreation Opportunity Spectrum (ROS).</p> <p>Within the ROS, areas classified as either "semi-primitive" or "primitive" would generally meet the Wilderness Act criterion of providing "opportunities for solitude or a primitive and unconfined type of recreation". Since there are few "primitive" areas in the Eastern U.S., we primarily looked for the "semi-primitive" areas which according to the ROS Handbook, need to contain at least 2,500 acres. However, we also recognized that this cannot be a hard and fast rule, and the regional guidance for inventorying roadless areas specifically states that – "it is important to recognize that this 2,500-acre semi-primitive 'core' size is not an absolute minimum. It is only a screen and as such should be used only as a guide." (See also the response to concern 6-20.)</p> <p>Comments were made that the criterion of "solitude or primitive and unconfined recreation" should not be used in the determination of which lands should be included in the roadless inventory. However, FSH 1909.12, Chapter 7.1 states that, "The first step in the evaluation of potential wilderness is to identify and inventory all roadless, undeveloped areas that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act." Section 2(c) of the 1964 Wilderness Act states that "An area of wilderness is further defined to mean in this Act an area ..." that "(2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation." (See also the responses to concerns 6-20 and 6-38.)</p>
6-52	Public Concern: The Forest Service should better communicate the basis for recommending areas for wilderness study.	<p>Alternative maps that accompanied draft LMP and EIS show which portions of roadless areas were allocated to various prescriptions. Prescriptions were allocated based on the Alternative's particular theme. See Chapter 2, EIS.</p> <p>All of Bald Mountain Ridge Scenic Area is contained inside Bald Mountain Roadless Area (8,653 acres out of 11,744 acres). For this Roadless Area, Alternative A included 9,785 acres in Rx 1B; 67 acres in Rx 4A; 1,813 in Rx 9A3 (Watershed Restoration) and 2 acres in Rx 4B2. Alternative E included 11,672 acres in Rx 1B and 3 acres in Rx 4A; Alternative G recognized a portion of the scenic area with 6,734 acres allocated to Rx4F; 4,604 acres in Rx 1B and 323 acres in 4A (In analyzing Alternative G in DEIS, Table 3-119, it was assumed that integrated designated scenic areas and A.T. Rx allocations would be combined into WSA allocations.) In Alternative I, 7,337 acres are allocated to Rx 4F; 3,801 acres are allocated to Rx 12A; 6 acres to 4A and 479 acres to Rx 7E2.</p> <p>All the acres in Little Frog Addition NW were allocated to Rx 9A3 in Alternative A.</p> <p>Also see 6-46.</p>
6-53	Public Concern: The Forest Service should not interpret Congress's use of "challenge" to create extreme sport wilderness areas.	Revision of the CNF LMP follows direction in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, EFFECTIVE 8/3/92, CHAPTER 7 - WILDERNESS EVALUATION, 7.2 - EVALUATION OF POTENTIAL WILDERNESS, which gives direction on evaluation of potential wilderness. The characteristic of "Challenge" is one of the characteristics in determining the quality of the wilderness resource that is included in the analysis. See also response to concern 6-26.
6-54	Public Concern: The Forest Service should not follow regional guidance for the definition of "challenge" in wilderness areas.	The guiding principles for describing "challenge" are from the Forest Service Handbook 1909.12, Chapter 7. The information in the regional guidance document the commenter is referencing was simply an example of what a write-up on "challenge" in a "generic" roadless area could possibly look like. The commenter has however, misinterpreted the "example write-up" as the actual guiding principles. (See also the responses to concerns 6-20 and 6-53.)
6-55	Public Concern: The Forest Service should remove bias against consideration of stand alone wilderness areas.	The Regional guidance on developing a roadless area inventory, dated May 19, 1995; and the guidance on evaluating the roadless areas, dated July 22, 1997; both outline processes to identify and evaluate all the areas that meet the criteria for potential wilderness and not just those areas adjacent or contiguous to existing wilderness areas. The "design criteria" for the

		<p>“rolling alternative” (Alternative I) did include a statement to start the development of this alternative with the “wilderness additions” being recommended for wilderness. However, this was only to be a “starting off point” for further discussions/deliberations on which areas to include for wilderness recommendations within this particular alternative. It was these discussions/deliberations with the public, along with the information applicable to each roadless area, that led to the ultimate decision on which areas to recommend for wilderness in Alternative I.</p> <p>The Record of Decision then provides the rationale for why roadless areas were recommended or not recommended for wilderness designation within the Selected Alternative.</p>
6-56	Public Concern: The Forest Service should include additional areas as wilderness study areas.	Chapter 2 of the EIS presents a range of alternatives, some with large acreages in Wilderness Study Rx and some with no recommendations. The EIS and prescription maps that accompany it show where these recommendations are made; Rx1B describes allowed and prohibited uses in Wilderness Study Areas. Also see responses for 6-3 and 6-11F.
6-56.a	Because the public wants additional wilderness.	See responses for 6-56 and 6-47.
6-57	Public Concern: The Forest Service should recommend suggested areas for wilderness study.	See response for 6-58.
6-58	Upper Bald River watershed, Flint Mill, Bald Mountain, Rogers Ridge, Devils Backbone, Iron Mountain, Slide Hollow, Big Frog addition, Gee Creek addition, Little Frog addition, Big Laurel Branch addition, Bald River Gorge addition, Joyce Klimer/Slickrock addition, Sampson Mountain addition, Citico Creek addition, Unaka Mountain extension, Maple Camp Lead addition Public Concern: The Forest Service should limit recommendations for wilderness area studies.	Cherokee NF’s Roadless inventory was established through study and public input in 1995; the evaluations were drafted in 1998 and updated in 2002. Several, if not all, of the areas listed here were studied in detail in 1995; some did not meet the established criteria, while others met the criteria and were included, totally or in part, in the Roadless inventory. Appendix C of the EIS provides an evaluation for each inventoried Roadless area; also see Chapters 2 and 3 of the EIS for analysis of the full range of Alternatives. Alternatives are presented in the EIS that recommend substantial acreage to Wilderness Study Areas (Alternatives G, E. A).
6-58.a	Please consider dropping Prescription 1.B because additional acres of non-managed lands will exacerbate the over abundance of late successional forest stands. (Tennessee Department of Agriculture, Nashville, TN - #2383.13.55000.301.C)	Different perspectives regarding recommendations for Wilderness Study Areas have been addressed in the EIS. Alternatives are presented in the EIS that recommend substantial acreage to Wilderness Study Areas (Alternatives G, E. A) as well as recommend none (D, F).
6-61	Public Concern: The Forest Service should be consistent when eliminating wilderness area recommendations.	<p>Determining the inventory of wilderness is a straightforward account of what wildernesses are available in the area.</p> <p>The evaluation process for recommending roadless areas to the National Wilderness system is defined in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT, PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, CHAPTER 7 - WILDERNESS EVALUATION. The CNF uses this process for recommending and eliminating potential areas for wilderness recommendations. The recommendations are in response to the management emphasis of each alternative.</p> <p>The LMP follows direction in FSH 1909.12 - LAND AND RESOURCE MANAGEMENT, PLANNING HANDBOOK, WO AMENDMENT 1909.12-92-1, CHAPTER 7.23 for determining need for an area to be designated as wilderness.</p> <p>See response to concern 6-34, 6-35, 6-56 and 5-40 for additional comments.</p>
6-62	Public Concern: The Forest Service should not recommend additional wilderness areas.	See response to concern 6-22.
6-62.a	And should manage for multiple uses	All Alternatives are consistent with the Multiple Use Sustained Yield Act; however, the Act allows for broad discretion and there is a wide range of opinions as to what mix of goods and services constitute ‘multiple use.’ The seven alternatives in this EIS present that range.
6-62.c	Because there is currently enough wilderness	See 6-58.a
6-62.f	Because wilderness limits monitoring options	Resources and alternatives for their management were considered during development of evaluation of the Alternatives. With the Alternative I allocation as Wilderness Study Area, monitoring may continue with hand held motorized equipment if approved by the regional forester or by employing alternative methods that are consistent with current FSM direction
6-62.g	Because biodiversity and habitat productivity are better served by a mix of plants and animals throughout the forest.	In Alternative I, approximately 40% of Cherokee National Forest is allocated to motorized or non-motorized backcountry emphasis, leaving approximately 60% in other types of management. The range of acreage allocations is discussed by Alternative in Chapters 2 and 3 of the EIS.
6-62.h	Because wilderness limits access.	See 6-3 and 6-62.g. In Alternative I, slightly more than 7% of CNF acreage is allocated to (existing) designated Wilderness and new Wilderness Study Areas.
6-62.i	Because wilderness designation does not provide economic benefits to surrounding communities.	See 6.62h. It is a misconception that wilderness does not provide economic benefits to local communities. Some recent studies indicate that wilderness actually provides more economic benefits to nearby communities than do traditional extractive industries such as logging which, prone to boom and bust, is often not a reliable source of jobs and income. Communities located near wildernesses often attract new residents and this may lead to greater income and job growth and an increase in property values. Other “non-market” benefits provided by wilderness include protection of watersheds, conservation of biodiversity, and preservation of wild lands for future generations. In short, wilderness does not “lock up” resources and does not impoverish local communities. Rather it may help protect the economic future of those communities by preserving high quality natural environments for which the demand is increasing. For more information, please see such works as Economic Values of Wilderness in the United States by J. B. Loomis and R. Richardson, R; The Economics of Wildland Preservation by Thomas Michael Power; Windfalls for Wilderness: Land protection and land value in the Green Mountains by S. Phillips; Economic Benefits of Wilderness by Thomas Michael Power and Economic Benefits of Wilderness by Dr. Pete Norton).
6-62.m	Including Big Laurel Branch and Sampson Mountain	See 6.46, 6.47 and 6.56.
6-62.n	Including Upper Bald River	See 6.46. Holly Flats campground and a number of managed wildlife openings are excluded from the Roadless area and from

		Rx 1B in Alternative I. Refer to description in Appendix C, EIS.
6-65	Public Concern: The Forest Service should protect all of the land that qualifies for wilderness.	See 6.3, 6.11c and 6.11f and 6.58a.
6-66	Public Concern: The Forest Service should consider non-inventoried roadless areas for possible wilderness recommendations.	Regional Forester 1920 letter of March 8, 2002 directed Forest Supervisors to consider non-inventoried roadless areas where appropriate. "Where the public or Forest Interdisciplinary Team (IDT) has proposed that a particular area outside of the roadless inventory be recommended for Wilderness – the Forest Supervisor has the flexibility and option to consider assigning that area a Management Prescription 1B (Recommended Wilderness Study Area) the same way he or she would consider allocating that area to any of a number of other possible land allocations. These allocations should address a particular issue or need. If the Forest Supervisor decides to allocate such an area outside of the roadless inventory to a Mgt. Pres. 1B in the LMP, then that area will need to have a corresponding description and evaluation in Appendix C of the EIS. This description would be somewhat similar to the evaluations for the individual roadless areas in that it would describe the attributes of the area and document why it is being recommended for wilderness consideration. The LMP should also identify actions that are needed to achieve the area's potential wilderness characteristics (for instance, if there are any roads in the area, plans may be needed to close and decommission them in the future.)" See response to concern 6-26.
6-67	Public Concern: The Forest Service should include suggested areas for recommended wilderness and wilderness expansions. Flint Mill, Rogers Ridge, Bald Mountain Roadless Area (into Pisgah National Forest), Bluff Mountain, Devils Backbone, Iron Mountain, Slide Hollow, Flats Mountain Area, Stoney Creek Scenic Area, Cowcamp, Joyce Kilmer/Slickrock Wilderness expansion, Big Laurel Branch expansion, Gee Creek expansion, Citico Creek expansion, Unaka Mountain expansion, Maple Camp Lead expansion	The Roadless Area review completed by the southern Appalachian national forests (Cherokee NF, Chattahoochee and Oconee NFs, Jefferson NF, NFs in Alabama, and the Sumter NF) as part of the requirements for LMP revision evaluates all NFS lands to determine if their qualification for roadless status. The review is inclusive of lands identified in the Mountain Treasures publications by The Wilderness Society. The inventory evaluation process follows Forest Service Handbook (FSH) 1909.12, Chapter 7, Section 7.1, Inventory of Potential Wilderness. All lands that qualify for Roadless designation are included as Inventoried Roadless Areas. Those lands that do not qualify are not included in the designation. The LMP revision evaluates all inventoried Roadless Areas for wilderness study following direction in FSH 1909.12, Chapter 4.19c, FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness, and the July 22, 1997, letter on the Southern Region's Guidance to FSH 1909.12 Land and Resource Management Planning Handbook, Chapter 7.2, Evaluation Of Potential Wilderness and Chapter 4.19c, Appendix C – Roadless Area Evaluation and makes recommendations based on the analysis. Recommended Wilderness Study Areas are assigned to RX1.B. Inventoried roadless areas not allocated to RX1.B were allocated to prescription areas 2.B.3, 4.A, 4.F, 7.A, 7.B, 7.E.2, 8.B, 8.C, 9.F, 12.A, and 12.B. See response to 6.56a and 6.57. The acreage of Bald Mountain Roadless area is currently administered separately by Cherokee and Pisgah National Forests and may be considered as one unit during PNF's Plan revision at a future date.
6-67.d	Because demand for wilderness is increasing.	See 6.3, 6.11c and 6.11f and Appendix C of CNF's EIS.
6-67.g	To gauge the effects of land under various active management regimes.	There are 428,545 acres of officially-designated Wilderness in the Southern Appalachian mountains in eight national forests and Shenandoah National Park, as well as approximately 1,231, 961 acres of inventoried Roadless areas in the same region, including 464,544 acres in Great Smoky Mountains National Park. CNF shares tracts of designated Wilderness in the "tens-of-thousands" with Nantahala and Chattahoochee NFs (Joyce Kilmer-Slickrock/Citico Creek, 33,620 acres and Cohutta, 36,977 acres). For more information, see SAA <i>Social/Cultural/Economic Technical Report</i> .
6-107	Public Concern: The Forest Service should identify and map all rare communities in the Roan Mountain area and allocate Management Prescription 4.K, Special Areas.	All rare communities are managed according to direction found in the CNF revised LMP, Chapter 3, RX9.F, Rare Community prescription.
6-109	Public Concern: The Forest Service should remove RX7A-1 from Management Prescription 7.A, Scenic Byway Corridor.	Vegetation management within CNF's Scenic Byway prescription area (along Ocoee and Cherochala Scenic Byways) is not intended to be volume-producing, but for other resource considerations, for instance, to enhance scenery.
6-110	Public Concern: The Forest Service should allocate a 7.A, Scenic Byway Corridor, or Back Country Management Prescription to Brushy Ridge.	All or portions of the acreage in Brushy Ridge Roadless Area (7,389 acres) were allocated to backcountry recreation and scenic byway prescriptions in Alternatives A, D, E and I and as a Wilderness Study Area in Alternative G.
6-111	Public Concern: The Forest Service should change the management prescription of several areas to 7.E.1, Dispersed Recreation.	Prescriptions are allocated to different areas in order to achieve management objectives for many resources. Prescription 7.E.1 is generally described as management emphasis for Dispersed Recreation Areas and is unsuitable for timber management. Prescription 7.E.2 is generally described as management emphasis for Dispersed Recreation Areas and is suitable for timber management. Prescription 8.B is generally described as management emphasis for Early-Successional Habitat and is suitable for timber management. Where Dispersed Recreation emphasis areas have been assigned a prescription that is suitable for timber management, timber management is compatible with the recreation management objectives of the areas. Dispersed recreation includes a number of uses, hiking, horseback riding, wildlife viewing, and hunting, to name a few. Some uses are enhanced through creation of early successional habitat. For this reason, the CNF allocated prescription 7.E.2.
6-115	Public Concern: The Forest Service should overlay bear habitat with wilderness candidates.	As part of the roadless areas evaluations, the evaluations consider any species habitat associates or individual species with habitat needs within the roadless areas. This includes bear habitat. However, it should be noted that wilderness designations are not needed to maintain bear habitat. See response to concern 6-26 for additional comments.
6-117	Public Concern: The Forest Service should allocate the Management Prescription 12.C, Natural Processes in Remote Areas, to	Some of these areas are part of CNF's Roadless Area Inventory and some did not meet the criteria for road density, solitude,

	several areas.	etc. The four that are part of the Roadless inventory are mostly allocated to Rx 12B (plus Rare Communities, Recreational Rivers and Appalachian Trail prescriptions, where applicable.) These are areas with no open roads, where road building is not allowed and where timber harvesting is only allowed under certain conditions, subject to the Roadless Area Rule. Also see 6-3 and 6-11.d.
6-125	Public Concern: The Forest Service should write Management Prescriptions 8.E.1, 9.A.1, 9.A.3, 12.C.	The CNF developed the prescriptions that are allocated in Alternative I. For all other prescriptions, the regional outlines for the prescriptions were used.
6-126	Public Concern: The Forest Service should change the management prescriptions for several areas.	See 6-117, 6-67 and 6-58. For Scenic Areas, Rock Creek Gorge, Coker Creek and Doe River Gorge were allocated to Rx 4F in Alternatives A-I. The White Rocks area is not a designated "Special Interest Area", established by the Regional Forester; however because of its proximity to the Appalachian Trail, much of the area fell into 4ARx across all alternatives, with some of the acreage in Rx 8C. (See Alternative maps that accompanied draft LMP.)
6-137	Public Concern: The Forest Service should inventory, analyze, protect, and designate several areas.	See responses for 6-17, 6-26 and 6-34.
6-140	Public Concern: The Forest Service should raise the scenic integrity of areas on the forest that are low, very low, or unacceptably low.	The Scenery Management System guides protection and enhancement of scenery in CNF. Scenic Integrity Objectives (SIOs) are established by inventoried scenic class in each management prescription. There are no objectives for "very low" or "unacceptably low", except in Alternative F, the current or "No Action Alternative." A "Low" SIO is not allowed in many prescription areas, and is confined to Scenic Class 3 or lower in others.
6-146	Public Concern: The Forest Service should conduct a suitability analysis of several rivers for Wild and Scenic River designation.	The CNF conducted an analysis of the rivers and streams as required by FSH 1909.12,8.14. This directs forests to study rivers and evaluate their eligibility for inclusion in the National Wild and Scenic Rivers System. The planning teams evaluate each river to verify that it meets the eligibility criteria specified in sections 1(b) and 2(b) of the Wild and Scenic Rivers Act. Documentation of the finding of eligibility or noneligibility and the river's potential classification are included in the EIS. Beyond this point, there is latitude in treatment of eligible rivers. The preferred process is to proceed with determining suitability by completing a river study in the draft LMP. However, the CNF will not complete suitability analysis at this time and is delaying the suitability determination on most eligible rivers until a subsequent separate study is carried out. The ROD is deciding that the Conasauga River is suitable. In the interim, the LMP provides for protection of the river area until the suitability analyses are complete.
6-148	Public Concern: The Forest Service should not actively manage areas in violation of the Wild and Scenic Rivers Act.	Comment pertains to Sumter NF. However, the Wild and Scenic Rivers Act was not intended to stop all activities within the corridors, activities range from fewest in the wild sections to more in the recreational sections as long as those activities protect and enhance the outstandingly remarkable values of the river.
6-158	Public Concern: The Forest Service should widen the Wild and Scenic River corridor between Ira Branch and Lick Log Creek.	Wrong code. Pertains to the Sumter NF only.
6-165	Public Concern: The Forest Service should properly evaluate all rivers that qualify under the Wild and Scenic Rivers Act.	See response to concern 6-146
6-166	Public Concern: The Forest Service should allocate the Management Prescription 4.F, Scenic Areas, to several areas.	Rock Creek Gorge, Coker Creek and Doe River Gorge are allocated to Rx 4F in Alternatives A-I. The White Rocks area is not a designated "Special Interest Area", established by the Regional Forester; however because of its proximity to the Appalachian Trail, much of the area fell into 4ARx across all alternatives, with some of the acreage in Rx 8C. (See Alternative maps that accompanied draft LMP.)
6-166.c	Including the proposed Big Laurel Branch extension	In Rolling Alternative I, Big Laurel Branch extension has been reallocated to include portions of the acreage in Rxs 4A and 12A in addition to Rx 1B. Also see 6-22.b. See Chapter 3, Special Areas, in the EIS, for uses that are in harmony with this designation.
6-170	Public Concern: The Forest Service should enlarge the area of the Coker Creek Scenic Area.	See Chapter 3, Special Areas, in the EIS, for uses that are in harmony with this designation. All the currently-designated acreage of Coker Creek Scenic Area was allocated to Rx 4F in each of CNF's seven alternatives. One-quarter mile on each side of the Hiwassee River was allocated to some combination of scenic byway, scenic corridor, developed recreation, dispersed recreation and watershed restoration prescriptions in each alternative. In Alternative I, the river corridor was enlarged to encompass foreground scenery.
6-190	Public Concern: The Forest Service should ensure that land exchanges will not lead to degradation or coal mining.	Land exchange cases must comply with agency policy and direction, forest land management plans and applicable laws including the National Environmental Policy Act. The land exchange decision is a determination by the authorized officer if the public interest is well served by exchanging federal and private interests in land, not to approve or disallow specific activities following completion of the exchange. Although reasonably foreseeable actions and cumulative effects are considered in the analysis to come to a reasoned decision on public interest, once the exchange is completed, the federal lands are managed under private ownership in accordance with their highest and best use and in accordance with local zoning, municipal code and state and federal regulations. Private lands are managed in accordance with forest land management plans. Coal mining is an acceptable form of energy extraction in all states and its methods and impacts are highly regulated by multiple state and federal agencies both on federal lands and on private lands. Forest Service policies, practice and procedure is to avoid regulating private property use through the use of reservations except where clearly shown to be in the public interest or required under federal law. Outstanding mineral rights on federal lands are fully recognized in the conveyance deed to the private exchange party and are beyond the control of the federal agency.
7-1	Public Concern: The Forest Service should manage lands for environmental preservation, protection, and restoration.	See response to concern 3-526.
7-1.a	Because it is what the public wants.	Chapter 3 of the EIS under "Recreation Related Programs" references the <i>National Survey on Recreation and the Environment</i>

		and other research conducted by Ken Cordell as part of the analysis for recreation demand and trends.
7-3	Public Concern: The Forest Service should manage forests for watershed and habitat protection, wilderness, and biodiversity.	The emphasis of the Revised LMP is listed in the description of Alternative I in the "Alternatives described in Detail" section in Chapter 2 of the EIS.
7-14	Public Concern: The Forest Service should acknowledge that management plans have been based on outdated models and erroneous conclusions.	The analyses used for development of the EIS are described in Appendix B of the EIS.
7-16	Public Concern: The Forest Service should be commended for the proposed forest management plan.	Thank you.
7-18	Public Concern: The Forest Service should actively manage National Forest System lands in a manner that provides multiple use benefits for all Americans.	The theme of the revised LMP is described in the "alternatives considered in detail" section in Chapter 2 of the EIS, under "Alternative I." Effects of Alternative I are displayed throughout Chapter 3 of the EIS. Some of the expected outputs are displayed in Appendix H of the revised LMP.
7-19	Public Concern: The Forest Service should maintain a balanced approach of managing the forest's resources and providing quality-of-life opportunities.	Such a "balanced approach" is important to this LMP. The Record of Decision speaks to that balance when it addresses the Rationale for the Decision and in other parts. The selection of an alternative for management of the forest is complex and requires examination of many factors, comments, and impacts. This was done.
7-25	Public Concern: The Forest Service should manage National Forest System lands for ecological restoration.	See response to concern 3-526. Some commenters are concerned that lands classed as suitable for timber production has decreased, which they feel will lead to reduced opportunity for active management, which is necessary to achieve desired ecological conditions. Being classed as unsuitable for timber production does not prohibit or discourage active management. Vegetation management conducted to achieve desired ecological conditions may occur on these lands, even if the management is accomplished using a timber sale as the tool.
7-27	Public Concern: The Forest Service should clarify the monitoring and evaluation of rare communities.	Please see response to concern 3-535. Additional details on monitoring of rare communities are included on the associated Monitoring Task sheet, which is available on request. Additional details will need to be worked out during implementation.
7-28	Public Concern: The Forest Service should ensure adequate monitoring and evaluation.	Some public comments reflect an interest in rigorously exploring cause and effect relationships as they may relate to planned practices, much as would be done in research studies. LMP monitoring is distinguishable from rigorous research studies in that it builds information to be used through the more routine observations that are part of the programs and actions required during implementation. Measurements and observations are planned, but from a more strategic and with less rigor basis than would be required for research studies. It is agency policy to use the management review system as the primary process to ensure evaluation and documentation of the results of forest plan monitoring are accomplished. Plan implementation will be accomplished through projects, which must comply with the plan. Project planning and monitoring is done to assure that work is accomplished in compliance with the plan. Periodic reviews of projects assure that these requirements are being met.
7-29	Public Concern: The Forest Service should seek additional funding to conduct monitoring.	Funding is clearly a limiting factor for monitoring as well as any other activity of forest management. Funding needs for the monitoring of this plan will be assessed and planned on the Forest in the initial year of implementation and for each subsequent year. Funding needs will be reported to the President for agency budget formulation. Funding levels ultimately are the purview of Congress and the President. Additional actions that are being taken and continually explored to stretch available funds and provide for monitoring needs include: <ul style="list-style-type: none"> • Application of remote sensing, geographic information systems and expanded data analysis capacity • Utilization of information provided by other agencies • Partnerships with agencies, universities and professional organizations • Utilizing qualified volunteers to supplement the agency workforce Monitoring task sheets will be developed to utilize these resources to extend the agency capacity to monitor the effectiveness of the plan. Annual review and adjustment to the monitoring task sheets will provide for changes needed due to technological advances, shifts in funding and priorities, workforce changes, and new opportunities for cooperation. Research needs will be identified and updated each year for additional effectiveness and validation needs that exceed the monitoring program itself.
7-34	Public Concern: The Forest Service should require appropriate monitoring and record maintenance.	Agency information systems will be utilized for tracking monitoring data. Most monitoring records will be available for public review. Locations of heritage resources and data obtained from other organizations may be protected from release. See response to concern 7-35.
7-35	Public Concern: The Forest Service should better develop the Monitoring and Evaluation Plan in Chapter 5 of the PRLMP.	NFMA regulations specify that monitoring requirements identified in the forest plan shall provide for: <ol style="list-style-type: none"> (1) A quantitative estimate of performance comparing outputs and services with those projected by the forest plan; (2) Documentation of the measured prescriptions and effects, including significant changes in productivity of the land; and (3) Documentation of costs associated with carrying out the planned management prescriptions as compared with costs estimated in the forest plan. (4) A description of the following monitoring activities: <ol style="list-style-type: none"> (i) The actions, effects, or resources to be measured, and the frequency of measurements; (ii) Expected precision and reliability of the monitoring process; and

		<p>(iii) The time when evaluation will be reported.</p> <p>(5) A determination of compliance with the following standards:</p> <p>(i) Lands are adequately restocked as specified in the forest plan;</p> <p>(ii) Lands identified as not suited for timber production are examined at least every 10 years to determine if they have become suited; and that, if determined suited, such lands are returned to timber production</p> <p>Public concern expressed seems to focus on the adequacy of the Monitoring Plan in meeting provisions 2 and 4 above. The Appendix J monitoring summary table provides a matrix that relates the measured goals and objectives described in detail in earlier chapters of the plan to the monitoring activities described as monitoring questions, elements, general methods, duration/frequency, reporting intervals, precision, reliability and responsibility. More specific protocols, methods, sampling intensities and locations to be applied in completing the described monitoring activities, which are frequently questioned in public comments, are covered in monitoring task sheets outside the plan.</p> <p>Plan implementation will be accomplished through projects, which must comply with the LMP. Project planning and monitoring is done to assure that work is accomplished in compliance with the plan. Periodic reviews of projects assure that these requirements are being met.</p>
7-35.a	Because Forest corridors contain disadvantaged economies and young residents must leave the area for employment.	The impacts on forests local economies of all alternatives considered are found on pages 420-423 in Chapter 3 of the DEIS. The last table in this series of tables is particularly relevant in that it shows the relative share of the Forest Service's programs and expenditures and their effect on the local economy. In both instances the overall effect on the local economies in terms of employment and total income is very small. The Forest Service tries to select an alternative that presents a balanced supply of the many resources available to the public.
7-36	Public Concern: The Forest Service should end commercial resource development activities.	The CNF revised LMP does not make direct decisions about whether or not commercial resource activities, per se, will or will not exist on the CNF. Rather, this plan makes strategic decisions, consistent with NFMA that "... provide for multiple use and sustained yield of goods and services from the National Forest System..." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition, Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC.
7-41	Public Concern: The Forest Service should not invest in commodity extraction programs.	The range of alternatives is displayed in Chapter 2 of the EIS. The table labeled "Projected harvest acres per year by Alternative" in Chapter 3 of the EIS displays values of 384 (Alternative E) to 17,097 (Alternative B) for timber harvesting.
7-42	Public Concern: The Forest Service should provide more detailed information on the effects of resource management activities.	The EIS sufficiently discloses the effects of the alternatives considered for responding to the purpose and need for action.
7-42.a	On soil resources	Note: Site specific to the Clench Ranger District. Just because it happened on the Clench Ranger District doesn't mean that logging and road building causes and contributes to landslides on the Cherokee.
7-45	Public Concern: The Forest Service should integrate forest uses.	The revised LMP establishes zones, or "Prescription" areas, in order to segregate incompatible uses on the CNF. For each prescription, a desired condition statement is written. The desired condition statement (Chapter 3 of the revised LMP) describes in general terms what uses, and to some degree, concentration of uses is tolerated and compatible within the prescription area. As much as possible, all uses that are compatible with achieving the desired condition are allowed in a prescription area..
7-46	Public Concern: The Forest Service should conduct research and field assessments to support the forest plan and forest management.	There is sufficient protection in the revised LMP to restore and protect "rare and protected species." I refer you to the "Terrestrial Wildlife and Threatened, Endangered, Sensitive Species Habitat" section and "Rare Communities and Old Growth" sections in Chapter 2 of the revised LMP, and the "Prescription 9.F, Rare Community" section in Chapter 3 of the revised LMP for full direction in managing for "rare and protected" species.
7-51	Public Concern: The Forest Service should prohibit clearcutting, development, and road building.	See response to concern 3-526.
7-52	Public Concern: The Forest Service should prohibit road building and timber harvesting.	There is no requirement to place the lands listed in the Wilderness Society Mountain Treasures publications that would prevent road building or logging. Areas were assigned to prescriptions that best met the objectives of the LMP. See response to concerns 6-67 and 6-17.
7-54	Public Concern: The Forest Service restore natural processes and native forest communities.	The revised LMP allocates lands in specific needs of habitat restoration to prescriptions that emphasize such activity. For example, approximately 72,700 acres are allocated to the 9.H prescription. The revised LMP also allocates approximately 96,900 acres to the 7.E.2 prescription, which emphasizes dispersed recreation, including hunting. Timber harvesting is allowed, to develop and maintain conditions that enhance the activity. Every prescription (Chapter 3, revised LMP) has direction addressing forest health, as long as ecosystem management is legally compatible with the desired condition. See response for concern 2-3 and 2-5.
7-55	Public Concern: The Forest Service should not use the term 'restoration' because it implies that the forests have not been properly managed.	Thank you for your comment.
7-58.	Public Concern: The Forest Service should consider the natural dynamics and gap-phase regeneration of Southern Appalachian forests.	See the response to concern 7-184.
7-59	Public Concern: The Forest Service should conduct ecological restoration without commercial timber harvest.	Restoration of forested systems is facilitated by removal of existing canopy vegetation. This provides necessary growing space for the establishment and development of naturally occurring vegetative communities. There are three options with respect to canopy manipulation: 1) partial removal through harvest 2) remove all canopy vegetation through harvest 3) follow behind other canopy disturbances such as fire, insect or disease damage, or wind and ice damage. Removing canopy vegetation

		through harvest activities greatly reduces overall costs of restoration efforts. See response to concern 3-526.
7-68	Public Concern: The Forest Service should provide clear, concise, and unambiguous management objectives.	
7-72	Public Concern: The Forest Service should provide a rationale for listing volume objectives.	The planning regulations at 36 CFR 219 direct the FS to identify an allowable sale quantity (ASQ). By listing the ASQ as an objective, the production will be monitored and reported annually.
7-83	Public Concern: The Forest Service should harvest timber from National Forest System lands.	The selected alternative for the CNF revised LMP contains goals and objectives that will be accomplished through the activity of timber harvesting.
7-83.a	For multiple reasons.	Timber production is an theme in alternatives A, D, and H, but not Alternative I. Under Alternative I, a large percentage of early successional habitat conditions and restoration of naturally occurring vegetation will be achieved through timber sales.
7-83.b	To benefit wildlife.	Early successional wildlife habitat objectives are provided in management prescriptions 8A1, 8B, 8C, 9H, 7E2, and 7C. See chapter 3 of the revised LMP for detailed information on each management prescription.
7-85	Public Concern: The Forest Service should cut the maximum allowable acreage of timber.	Projected timber output levels for each alternative are the result of an integrated model that schedules harvests based on goals and objectives established for each management prescription with limitations and mitigations to protect and enhance all resource objectives.
7-86	Public Concern: The Forest Service should develop alternatives and management prescriptions that emphasize timber management.	The range of alternatives is described in Chapter 2 of the EIS. The list of prescriptions is provided in Chapter 2 also. All of the prescriptions have desired condition statements written by the planning teams of the southern Appalachian forest planners. These statements are located in the process records. Alternatives A, D, and F emphasize timber management, as indicated by the allocation of Prescription 10.A and 10.B. This information is displayed in the table labeled "Comparison of Alternatives by Prescriptions" in Chapter 2 of the EIS.
7-91	Public Concern: The Forest Service should conduct some commercial timber harvest.	Alternatives A, D, and H have management prescriptions (10A and 10B) that include specific objectives for timber production. Alternatives that have no management prescriptions with timber production objectives do have early successional wildlife habitat and ecosystem restoration objectives that may be achieved through commercial timber harvest activities.
7-91.a	To manage age classes and maintain forest health	All restoration and reforestation projects have multiple goals and objectives that guide the Cherokee National Forest to establish and maintain naturally occurring plant communities, based on the ecological potential of the site. There are further goals and objectives that provide guidance for forest health. See chapter 2, Vegetation and Forest Health section, of the Forest Plan for detailed information related to goals and objectives related to vegetation management.
7-92	Public Concern: The Forest Service should specify the percentage of National Forest System lands available for timber harvest.	In Alternative I, about 47% of forested lands are managed with an early successional objective. Lands on the CNF that have early successional objectives represent approximately 2% of timberlands across the state of Tennessee (Schweitzer 2000). Total acres for the CNF represent about 4.4% of the total forest lands in Tennessee (Schweitzer 2000).
7-93	Public Concern: The Forest Service should not harvest timber from National Forest System lands for various reasons.	See response for concern # 7-94.
7-94	Public Concern: The Forest Service should not harvest timber from National Forest System lands in various locations.	The selected alternative for the CNF revised LMP contains goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). These plans make strategic decisions, consistent with NFMA that "...provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.
7-94.a	Or build roads in compartments 40 and 41 in Johnson County	The CNF considered a variety of management prescriptions for this area, including: 4I in Alternatives A, E, and G, 6.A in Alternative B, 10.A in Alternative D and F, and 7.E.2 in Alternative I, the revised LMP.
7-95	Public Concern: The Forest Service should not conduct commercial timber harvest on National Forest System lands.	See response for concern # 7-94.
7-96.a	Because there are plenty of monoculture pine forests.	Pine planting for the Cherokee is confined to restoration of naturally occurring vegetation where existing seed sources for shortleaf pine and pitch pine are not adequate due to southern pine beetle damage or a need to convert from pure Virginia pine to mixed communities of upland hardwood-shortleaf pine- pitch pine. This plan has no objective to establish pure pine communities.
7-98	Public Concern: The Forest Service should not increase timber harvest.	See response to concern 2-5.
7-98.a	To comply with regional policy to manage forests for ecological integrity	This revised LMP has objectives for timber production in the order of 36,113 MCF. This is a result of ecosystem restoration activity and the development of early successional wildlife habitat. Restoration and the creation of early successional habitat can be facilitated through commercial timber harvest. In many cases commercial timber harvesting is the most efficient way to manipulate canopy vegetation. The projected harvest volume for this revised LMP is approximately 40% less than the 1986 LMP.
7-100	Public Concern: The Forest Service should consider that the agency does not benefit from timber harvest.	Projected timber output resulting from establishment of early successional habitat and ecosystem restoration are based on an integrated model where costs and revenues are analyzed. One "objective function" of the model is to maximize present net value. The purpose of the objective function is to ensure that the most efficient solution to the modeling problem is found. This objective function does not ensure that when project implementation takes place there will be some cost or revenues that exceed or fall short of predictions and assumptions used in the modeling process. The model takes into account mitigation measures established as goals and standards in the plan. Compliance with the goals and standards provides protection for all resources.

7-101	Public Concern: The Forest Service should analyze alternatives to timber harvest and wood products.	The CNF revised LMP was created using the process mandated by the NFMA and NEPA regulations. The plan revision process for each Forest included a look at a broad range of alternatives, each having a different intensity and management theme, Included in the range is an alternative that called for minimal (Custodial) management of the resources of the CNF.
7-102	Public Concern: The Forest Service should conduct an analysis regarding the need for commercial timber harvest.	Seven alternatives were analyzed in detail with primary objectives ranging from sustained yield of timber production to emphasis on restoration of natural processes. One alternative emphasizing minimal human intervention to natural resources was proposed but not analyzed in detail. Detailed descriptions of alternatives can be found in chapter 2 of the EIS. The selected alternative for the CNF revised LMP contains goals and objectives that will be accomplished by the activity of commercial timber harvesting.
7-108	Public Concern: The Forest Service should clarify the timber sale process.	<p>Forest Service estimates of revenues and expenses are achieved by analyzing historical data. These estimates are for activities that have not happened. CNF looked at timber harvesting and timber sale planning costs from sales that occurred in the 1990's. The methodology explaining how we derived timber costs and revenues is explained in the Process Record. Generally speaking, most modeling, and data estimation techniques are not explained in detail in the EIS.</p> <p>The CNF used historical data secured from TSPIRS for 1992-1998. CNF looked at data concerning Harvest Administration costs (and various subsets of this cost category), Sale Preparation costs, and Inventory and NEPA costs (and various subsets of this cost category). From these data an average was taken for each year. Then, a simple average by year was used to arrive at an average cost in each timber sale cost category. These data were used in SPECTRUM.</p> <p>The CNF calculated Reforestation and Timber Stand Improvement costs (and their related subsets of costs, e.g. types of site preparation under Reforestation; species of trees under Reforestation planting; types of Release, Pre-commercial Thin, Road construction under Timber Stand Improvement) from available forest data. Costs were adjusted to a common year (1996) and a simple average was taken. These costs were also used in the SPECTRUM model after adjusting to 2000 dollars.</p> <p>The Timber Data Company in Eugene, Oregon collects timber sale data stumpage prices from FS 2400-17 reports, puts this data in a database, and is able to report data out in customized fashions. The CNF purchased this data from hundreds of sales over several years in the 1990 decade. A time series of these years of historical stumpage was analyzed for an estimate of an "average" value for forest stumpage via a regression analysis spreadsheet in Microsoft Excel. This average price was adjusted to 2000 dollars and used in the SPECTRUM model.</p> <p>Purchaser road credits are no longer used on the CNF. The category of "interest and penalties" is a cost, which is a rare and insignificant amount to the total. These costs are considered exceptions to the typical costs experienced in the timber program. Such future costs are not considered a significant cost category.</p> <p>Estimated costs and revenues within SPECTRUM can be increased by an inflation factor for future years by the forest analyst.</p>
7-109	Public Concern: The Forest Service should adequately examine the effects of the timber harvest program.	The effects of all proposed activities, including timber harvesting, are examined for each alternative in the Final Environmental Impact Statement for the CNF revised LMP.
7-114	Public Concern: The Forest Service should demonstrate proper forestry methods to the public.	All proposed management activities are based on scientifically based research from universities or USFS experiment stations. Proposed management activities are further analyzed on a site specific basis to determine impacts to other resource objectives and to develop mitigation if necessary. A general description of silvicultural activities can be found in Chapter 6 of the EIS (glossary), Appendix B of the revised LMP, and in appendix F of the revised LMP.
7-116	Public Concern: The Forest Service should keep up with modern forest management practices and manage Eastern forests based on natural ecological processes and gap dynamics.	Fire, and even aged silviculture systems, including, shelterwood with reserves regeneration methods, are management tools that have achieved desired regeneration objectives in the southern Appalachians. Group selection regeneration methods approach gap phase conditions and have also achieved desired regeneration objectives for species that can become established and develop in more shady conditions.
7-126	Public Concern: The Forest Service should acknowledge that modern forest management has changed forest structure and composition.	The CNF acknowledges that changes to forest composition have occurred through vast logging operations in the late 19 th and early 20 th centuries and by suppression of fire among other social uses of the land.
7-128	Public Concern: The Forest Service should manage forests to create a diversity of successional stages, stand structures, and species.	Management of the CNF ecosystem is a major theme under which the management prescriptions were developed. The emphasis and desired future condition for each management prescription took into consideration the successional and structural diversity needs of the landscape. Forest health is considered in the development of the revised LMP and the allocation of management prescriptions. Direction for maintenance of forest health is added to each management prescription where it is appropriate and compatible with the desired condition.
7-128.a	To promote forest health	Even distribution of age classes is a theme in alternative D, as described in the "Alternatives Considered in Detail" section of Chapter 2 in the EIS.
7-128.b	To provide economic benefits.	The economic benefits of all alternatives considered in detail are displayed in the "Economic Impact" section of Chapter 3 in the EIS.
7-133	Public Concern: The Forest Service should use the most appropriate methods to ensure adequate advanced oak reproduction.	Oak shelterwood, a noncommercial treatment to develop existing oak regeneration to advance growth stage is proposed and discussed in appendix F of the revised LMP.
7-134	Public Concern: The Forest Service should specify guidelines and standards that address oak regeneration.	Oak regeneration is addressed in Chapter 2 of the revised LMP as an objective (18.02) and oak shelterwood treatment is discussed in appendix F of the revised LMP.
7-139	Public Concern: The Forest Service should, in Appalachian oak hardwood forests, conduct extensive thinning, followed by prescribed fire.	Integrated Pest Management (IPM) strategies are used in the revised LMP and include preparing oak communities for gypsy moth and other insect and disease problems specific to oak. See objective 18.03 in Chapter 2 of the revised LMP.

7-140	Public Concern: The Forest Service should support oak/hickory vegetation in riparian areas.	Management Prescription 11, Riparian corridors, is managed to protect, restore or enhance ecological processes and functions of aquatic and riparian components within the corridor. Timber production is not an objective. See Emphasis and Desired Condition for Management Prescription 11 in Chapter 3 of the revised LMP.
7-145	Public Concern: The Forest Service should acknowledge information that shows that most forest types in the Southern Appalachians, especially mesic and northern hardwood forests, are naturally uneven-aged forests which reproduce in small gaps.	See response to concern 7-184.
7-147	Public Concern: The Forest Service should, after timber harvest, plant diverse native hardwoods.	After regeneration harvest, the establishment of a new stand is must occur within 5 years (see objectives in Chapter 2 of the revised LMP). This can occur naturally from existing seedlings, coppice from stumps and roots, or by advance growth regeneration. Regeneration by artificial methods can be accomplished by seedlings where natural sources are not adequate. Regeneration of hardwood communities to species that naturally occur on a specific site is accomplished mostly with natural regeneration. Where adequate seed sources are not available or where a particular species is absent, for example white oak or northern red oak, seedlings of the desired species may be planted on a wide spacing to enrich the suite of species for the new stand.
7-148	Public Concern: The Forest Service should, after timber harvest, allow the forest to grow naturally or plant native trees.	See response 7-147 above.
7-150	Public Concern: The Forest Service should, after timber harvest, plant tree species identical to those removed.	Goals in Chapter 2 of the revised LMP under Vegetation and Forest Health provide guidance to restore and maintain forest communities to those communities predicted as most likely to occur, based on the ecological potential of the site. Also see response 7-146 above.
7-160	Public Concern: The Forest Service should open the forest to promote yellow pine establishment, and conduct planting.	Objectives in Chapter 2 of the revised LMP in the "Vegetation and Forest Health" section provide clear guidance to naturally occurring southern yellow pine and mixed pine-hardwood stands.
7-164	Public Concern: The Forest Service should actively manage old growth forests.	See response for concern 7-128, 7-165 and 7-166.
7-164.a	Because managing for old growth will create health problems in the future.	Over 50% of the lands on the CNF have no vegetation management objectives. As forests on these lands grow older they become more susceptible to insect and disease attacks.
7-164.b	Because increased risks of insects and disease endanger private lands	Over 50% of the lands on the Cherokee have no vegetation management objectives. This limits the establishment of younger forests in these areas, leaving a large forested areas to continue to age. Older forest tend to have less resilience to insects and diseases.
7-164.c	Because we have enough old growth	Old growth areas for the CNF depend heavily on management direction that is compatible with Old Growth objectives. These prescriptions have objectives specific to timber harvesting to stop them from developing into older forest.
7-164.d	Because unmanaged forests promote wildfires and diversion of funds	The CNF revised LMP includes direction for the maintenance of forest health and use of prescribed fire for the purpose of fuels management.
7-164.e	To maintain wildlife and forest conditions	The alternatives considered in detail (see chapter 2 of the EIS) provide a wide of management intensity. The preferred alternative, Alternative I, is intended to best meet the demands placed on the CNF.
7-165	Public Concern: The Forest Service should protect old growth forests.	The CNF revised LMP reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region," (June 1977). The LMP provides for present and future representation of old growth community types, their distribution, and variety of patch size.
7-165.b	For ecological and aesthetic reasons	The EIS (Old Growth Section, Chapter 3) states that there are no "old growth obligate species in the southeastern US. There is little or no existing. Future old growth acreage is listed in the table labeled "Acreage of future old growth in compatible management prescriptions by alternative fore the Cherokee National Forest (exclusive of possible old growth)", found in Chapter 3 of the EIS. The values range from 526,794 acres in Alternative E to 320,289 acres in Alternative D.
7-165.c	To benefit bees, birds, and other wildlife, plants, and valued elements.	See response for 7-64.b.
7-165.g	To maintain a sustainable planet	Analysis of the contribution of the "future old growth" displayed in the table labeled "Acreage of future old growth in compatible management prescriptions by alternative fore the Cherokee National Forest (exclusive of possible old growth) to the sustainability of the planet is beyond the scope of this analysis.
7-166	Public Concern: The Forest Service should manage and return all areas to old growth.	The CNF revised LMP reflects the mandate presented in the "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the southern Region" (June 1997). The LMP provides for present and future representation of old growth community types, their distribution, and variety of patch size. The selected alternative addresses many significant issues that preclude allocating the entirety of the CNF to old growth.
7-166.a	For areas with trees over 100 years old.	Chapter 2 in the revised LMP, in the "Rare Communities and Old Growth" section, is a goal, objective, and standard for the protection, evaluation, and tracking of old growth forest conditions.
7-171	Public Concern: The Forest Service should manage forests for sustained yield of new growth while protecting old growth.	The revised LMP provides protection of existing, possible, and future old growth while also providing for the development and maintenance of early successional wildlife habitat. Chapter 2 in the LMP provides direction for both of these objectives.
7-179	Public Concern: The Forest Service should follow regional guidance regarding old growth.	The regional old growth guidance provides information on how to identify existing old growth areas, different options for managing old growth, and an overall approach for addressing old growth during forest planning. The CNF followed this guidance by conducting an inventory of possible old growth and using this as a guide in the development of the different alternatives. The LMP includes a standard that any stands identified as "existing old growth" will be protected, and the LMP

		provides a network of old growth areas across the forest. This “network” does not have to consist only of areas allocated to a Management Prescription 6. There are many management prescriptions that will allow stands to eventually provide old growth conditions and these areas are a part of the overall “network”. The EIS at section 8.5.0 in Chapter 3 shows the acres of possible and future old growth for all the alternatives.
7-179.a	And protect listed and identified patches	Tables listing possible and future old growth acres by Old Growth Community Type with maps is displayed in Appendix D (Old Growth Strategy) of the LMP.
7-184	Public Concern: The Forest Service should not use forest successional classes as a coarse filter for species viability.	<p>Several commenters questioned the appropriateness of the even-aged successional model inherent in the Successional Forest Options incorporated in the revised LMP. They frequently cited materials raised by a resource specialist on the CNF that contend that southern Appalachian forests are naturally uneven-aged, and regenerate predominately through “gap-phase dynamics” rather than by larger, more severe disturbances. Some commenters fault the Forest Service for not considering this information.</p> <p>Contrary to assertions made by some commenters, this information was considered during planning. It was distributed to staffs of all southern Appalachian forests undergoing revision, and was reviewed by planners at the forest and regional levels. Points of agreement and disagreement were discussed at varying levels across these forests. There are many points of agreement, which are corroborated by a predominance of mainstream scientific literature. We agree that some major forest types in the southern Appalachians are low disturbance systems that commonly regenerate through natural development of relatively small canopy gaps, and that frequent fire in these systems is not desirable. These areas of agreement are incorporated in the revised LMP and EIS through direction and analysis for mesic deciduous forests, which include cove, riparian, mixed mesophytic and northern hardwood forests. This direction and analysis considers the amount of these forests allocated to Forest Successional Options 1 and 2 (which should be dominated by gap-phase processes), the need for canopy gaps within these forests, and the limited role of fire (See section 6.1 in Chapter 3 of the EIS, and, see Goal 17 and its associated objectives and Goal 21 and its associated objectives in Chapter 2 of the revised LMP, from the plan). There are, however, some of the specialists’ conclusions with which we disagree, as do some members of the academic and research communities with whom we have consulted.</p> <p>The presentation of forest conditions in the late 1800s and early 1900s depends heavily upon the Ashe and Ayers Report and descriptions contained in the field notes and maps of the tracts of land that were acquired for inclusion in the National Forests. A substantive literature (bibliography) was provided to support the specialists’ views. However, this team member rejects or ignores the substantial body of scientific literature (much of it published in the last 10 years) that contradicts his conclusions regarding the role of fire and other disturbance in maintaining upland oak and pine forest types. Unlike the scientific literature used and cited during planning, this individual team members’ analysis of forest conditions has not been through the rigorous process of peer review, critique, and publication in mainstream scientific journals.</p> <p>The Forest Service contracted with Paul and Hazel Delcourt of the University of Tennessee, who have published widely on historical disturbance ecology, to review this specialists’ findings. Their written review indicates areas of agreement and disagreement similar to those identified by forest planning teams. It also is important to note that these are the interpretations of a resource specialist not trained as an ecologist or forester, professions that are educated and trained to make ecological interpretations of forest condition data. In his paper, use of terms, lack of reference to the most current scientific literature, and resulting conclusions often do not reflect the best available science. Based on these considerations, we believe the analysis was given an appropriate level of consideration during the planning process.</p> <p>Although understanding historical and pre-European settlement conditions provides an important context for conservation planning, restoring such conditions is not an overriding objective or legal requirement. In most cases, too much has changed for this restoration to be feasible, let alone desirable. Plan direction represents a decision on multiple-use management informed by the best science on disturbance ecology, not an attempt to recreate historical conditions.</p> <p>Based on synthesis of the scientific literature, our understanding is that southern Appalachian forests historically have been subject to highly variable disturbance regimes across the landscape. This variation resulted from the interaction of fire, wind, and other disturbance factors with the highly variable topography and edaphic conditions of the mountains. We disagree with the team member’s conclusions and follow most current scientific literature, in recognizing that fire, primarily of Native American origin, played an important role in maintenance of upland pine and oak forests, and open woodlands, savannas, and grasslands. Compared to today, forest structure was likely more open on upland sites, due to the influence of fire, and more heterogeneous on lower slopes and coves, due to gap-phase dynamics of older forests. Overall, within-stand structures were likely variable due to the variable effects of natural disturbance factors. Many areas would not easily be categorized as either even-aged or uneven-aged, but some level and pattern of older residual overstory trees would almost always be present, even in areas providing important early-successional habitat. This variable structure can be approximated with uneven-aged, two-aged, and even traditional even-aged management systems, all of which involve retention of varying levels of overstory structure. A patchwork of uniform even-aged stands established by clean clearcuts is clearly outside the historical range of variation of forest structure and is also clearly not the desired condition for any portion of the national forest.</p> <p>Although the revised LMP includes objectives for restoration of native fire-maintained habitats, we recognize that we will not be able to restore the influence of fire to the landscape to historical levels due to a variety of logistical and social reasons. Creation of early-successional forests can compensate for the loss of open fire-maintained habitats for some species. So, although we recognize that the mix of types of early-successional habitats maintained under the revised LMP cannot reflect historical conditions, we have considered the overall abundance of these habitats within an historical ecological context to</p>

		arrive at objective levels. As some of these fire-maintained habitats are restored, need for early-successional forest as habitat for some species will decline. However, need will not disappear; other species, such as ruffed grouse, depend upon the dense woody growth found in early-successional forests. In addition, other multiple-use considerations, such as need for habitat to support game species for recreation, ecological restoration of native forests, forest health considerations, and in some cases timber production, will continue to make creation of some level of early-successional forest desirable.
7-185	Public Concern: The Forest Service should accurately describe the historic dynamics of the Southern Appalachian forests as naturally uneven-aged.	See response to Public Concern 7-437.
7-186	Public Concern: The Forest Service should review data on natural succession and rewrite the EIS.	See response to Public Concern 7-437.
7-193	Public Concern: The Forest Service should inventory and map old growth.	See response for concern 7-221.
7-194	Public Concern: The Forest Service should adequately map and display the networks of large, medium, and small old growth patches.	See response for concern 7-217 and 7-221.
7-197	Public Concern: The Forest Service should cease timber production on National Forest System lands. .	The selected alternative for the CNF LMP contains goals and objectives that will be accomplished by the activity of timber harvesting (including clearcutting, where silviculturally correct). The majority of these goals and objectives, however, are not themed to timber production. Rather, the theme is ecosystem restoration and maintenance and forest health. The LMP makes strategic decisions, consistent with NFMA that "...provide for multiple use and sustained yield of goods and services from the National Forest System....." (36 CFR 219.1(a)). Strategic decisions include Desired Future Condition (DFC), Goals and Objectives to achieve DFC, and a list of activities that may be used to achieve DFC. A minimum management (custodial) alternative was developed, but was not studied in detail due to its failure to meet the mandates of NFMA and the MUSYA.
7-206	Public Concern: The Forest Service should explain why only the Jefferson National Forest documents "existing old growth".	The national forests in the southern Appalachians are in different situations in terms of their old growth inventories of "existing old growth", with some further along than others. Inventories from other groups/organizations can be presented to the Forests, but they still need to be verified that they meet the criteria for old growth as spelled out in the regional old growth guidance. Since these inventories are generally at the stand level, they are not allocated to specific management prescriptions in the LMP. Instead it is recognized that these stands could occur in any management prescription allocation, and in order to protect those stands of existing old growth, a forestwide standard is included in the LMP to provide that protection. This standard applies to both those stands currently identified as existing old growth, as well as any stands that may be identified in the future as meeting the criteria for "existing old growth". So even though the CNF may not have a completed inventory now, any project level evaluation will have to see if any of the stands proposed for management activities meet the old growth definition.
7-208	Public Concern: The Forest Service should clarify whether the "future old growth" category includes the 23,724 acres of "potential old growth."	Tables related to old growth in Chapter 3 of the DEIS have been revised for the final EIS. Future old growth is forest in management prescriptions that have old growth compatible management objectives. It is assumed that forests in these compatible management prescriptions will develop old growth characteristics over time. Old growth management remains the same for all alternatives; however, allocation of acres does vary by alternative.
7-211	Public Concern: The Forest Service should specify prescription objectives, standards, and guidelines that address old growth.	There is a Forestwide old growth goal, objective, and standard in Chapter 2, under the Rare Communities and Old Growth section.
7-213	Public Concern: The Forest Service should describe the desired future conditions for old growth on the forest.	See response for concern 7-217, 7-221 and 7-224.
7-214	Public Concern: The Forest Service should explain why Management Prescription 6X is not better utilized on the Southern Appalachian National Forests.	The range of alternatives displayed on Chapter 2 of the EIS demonstrates the use of the "6" old-growth prescriptions to promote old growth on the CNF. Alternative I allocates no land to an old-growth prescription, however, the discussion of Issue #3 in the same chapter in the EIS indicates that 359 thousand acres of old growth will result from implementation of the plan.
7-215	Public Concern: The Forest Service should specify and display acreage allocations for large old-growth patches.	Appendix D (Old Growth Strategy) of the revised LMP displays acres of possible and future old growth along with maps displaying location across the landscape.
7-217	Public Concern: The Forest Service should protect old growth on the Cherokee National Forest.	Chapter 2 of the revised LMP under the Rare Communities and Old Growth section has a goal, for protection, maintenance, or restoration of old growth patches; an objective to map patches of old growth during stand examination and complete field verification of possible old growth; and a standard to identify old growth patches during project planning.
7-219	Public Concern: The Forest Service should address old growth representation within major forest communities.	Appendix D (Old Growth Strategy) of the revised LMP displays possible and future old growth acres by old growth community type.
7-220	Public Concern: The Forest Service should better develop a network of old growth areas of various sizes and develop management prescriptions for these areas.	See response to comment 7-217 above.
7-221	Public Concern: The Forest Service should provide for the identification and evaluation of additional old growth patches on National Forest System lands.	There are a number of ways to meet the regional old growth guidance for having a "network" of large, medium and small old growth patches. These "patches" do not need to be specifically allocated to a Management Prescription 6. Old growth management can be met in other management prescriptions as well. When all the compatible prescriptions were mapped out, along with the forestwide standard to protect any stand that meets the criteria for "existing old growth" (which can include either stands currently inventoried or stands identified sometime in the future), a determination was made as to whether or not this "old growth network" was adequate, or if other specific old growth allocations were needed to fill in any "gaps" in the "network". In most cases, it was determined that the combination of the allocations of all the old growth compatible management prescriptions, along with the forestwide standard on "existing old growth", that the resultant "old growth network" was sufficient to address the old growth issue.

7-222	Public Concern: The Forest Service should better explain the old growth network on the Southern Appalachian forests.	See 7-221 above
7-224	Public Concern: The Forest Service should not expand old growth area designations.	<p>Developing a management plan for a national forest involves having to address a multitude of trade-offs. For the southern Appalachian national forests this includes trying to address 12 common issues, which are not necessarily compatible. An effort is made to find the mix of management activities that will best address all the issues. This means having a mix of areas where active management activities will be used to meet such issues as early-successional wildlife habitat needs, providing forest products, addressing forest health, etc.; while other areas will be managed to provide late-successional wildlife habitat needs, and to meet social demands for things such as old growth areas, areas for backcountry recreation, scenic areas, wilderness areas, etc. However, in many of these areas in the later category, certain activities to meet forest health needs may still be allowed to occur.</p> <p>Future old growth for the CNF is heavily dependent on management prescriptions that are compatible with old growth objectives. No land is allocated to a prescription with old growth as a primary desired condition.</p>
7-227	Public Concern: The Forest Service should provide a connection between existing old growth, possible old growth, and future old growth.	<p>“Possible Old Growth” is simply an initial inventory, to give planners an indication of where “existing old growth” stands might be found; and to give planners some information on where it would make sense to allocate management prescriptions for the purposes of managing/maintaining old growth. This initial inventory is essentially nothing more than a query of the CISC data base to find stands older than a certain age.</p> <p>“Existing Old Growth”, however, are those stands that meet all the criteria for being classified as “existing old growth” as determined by the Regional “Guidance for Conserving and Restoring Old Growth Forest Communities”. This regional guidance identifies up to eight criteria for making that determination. Whether or not a stand will meet these criteria is usually only determined by a field inventory.</p> <p>“Future Old Growth” includes acres in management prescription allocations where stands will likely meet the definition for “old growth” at some point in the future.</p> <p>“Existing old growth” stands may be found in old growth compatible management prescriptions (“future old growth”) and relatively isolated stands of “existing old growth” may also be found in other management prescription allocations. The “old growth network” is provided for through a combination of the lands allocated to the old growth compatible management prescriptions, and a forestwide standard that protects the “existing old growth” found in the other management prescriptions.</p>
7-228	Public Concern: The Forest Service should, in Standard FW-75, establish clear guidelines for protecting all existing old growth that is found.	Compliance with the regional old growth guidance is indicated in the objectives found in the Rare Communities and Old Growth section of Chapter 2 of the revised LMP. Monitoring ensures that the old growth goals are being met.
7-229	Public Concern: The Forest Service should better address the overall old growth strategy.	See response to concern 7-217, 7-221 and 7-227.
7-233	Public Concern: The Forest Service should provide adequate monitoring of old growth at both the plan and project level.	<p>The regional old growth guidance identifies three aspects of monitoring old growth. The first involves monitoring at the project level to determine if stands meet the criteria for being classified as “existing old growth”. The second involves plan implementation monitoring and making sure the projects are being implemented according to the LMP. This is identified in the Forest Plan Monitoring Chapter 5. The third involves using research to validate the old growth definitions, and the management strategies needed to maintain old growth conditions/characteristics.</p> <p>Results of old growth survey information will be maintained in the CNF Continuous Inventory of Stand Conditions (CISC) and related GIS system per direction in the Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forest in the Southern Region. Elements have been added to old growth monitoring questions.</p>
7-234	Public Concern: The Forest Service should recognize that the plans are inconsistent both across forests and within forests in the prescriptions that are considered old growth compatible.	The lists of management prescriptions that are considered “old growth compatible” varies between Forests because of two reasons. One is that different Forests use different subsets of the total list of possible management prescriptions. For instance, one Forest may have some lands allocated to a Management Prescription 12.C., while another Forest may have no lands allocated to that particular prescription. Another reason is that while there is a regional set of “generic” Management Prescriptions, the Forest could “localize” these prescriptions to meet their local needs. As a part of this “localization”, some aspects of the prescription could be changed so that it would no longer be considered “old growth compatible”. For instance in some cases, it was a Forest determination as to if a particular management prescription could contain lands “suited for timber production”. In these situations, if that particular prescription had “suited” acres, then it could be viewed as not being “old growth compatible”. But if another Forest made the determination the same management prescription would be “not suited for timber production”, then it could be viewed as being “old growth compatible”.
7-234.a	To provide bear habitat	Over 50% of the forested area of the CNF will have no specific objective to create early successional habitat conditions. This will mean that over 50% of the CNF will progress toward older age classes with no scheduled vegetation treatments. Management prescriptions that have early successional habitat objectives also have objectives to maintain a specified level of mid to late successional habitat.
7-238	Public Concern: The Forest Service should specify adequate old growth goals, objectives, and management prescriptions for the Southern Appalachian forests.	Many of the comments on this topic relate to questions about following the regional guidance for old growth. There are a number of ways to meet the regional old growth guidance for having a “network” of large, medium and small old growth patches. These “patches” do not need to be specifically allocated to a Management Prescription 6. Old growth management can be met in other management prescriptions as well. When all the compatible prescriptions were mapped out, along with the forestwide standard to protect any stand that meets the criteria for “existing old growth” (which can include either stands currently inventoried or stands identified sometime in the future), a determination was made as to whether or not this “old growth network” was adequate, or if other specific old growth allocations were needed to fill in any “gaps” in the “network”. In most cases, it was determined that the combination of the allocations of all the old growth compatible management

		prescriptions, along with the forestwide standard on “existing old growth”, that the resultant “old growth network” was sufficient to address the old growth issue.
7239	Public Concern: The Forest Service should not create 4-5% of early successional habitat within forests.	See response for concern 7-244.
7-242	Public Concern: The Forest Service should document the need for early successional habitat.	See response for concern 7-224.
7-244	Public Concern: The Forest Service should not create and expand early successional objectives.	<p>Early-successional habitat was one of the topics most frequently raised by commenters. However, some commenters did not appear to recognize distinctions among types of early-successional habitat that are used in the revised LMP and EIS. Understanding these distinctions is important because early-successional habitats are not all the same in their value to wildlife and in strategies for their management. Types of early-successional habitat that we have addressed include early-successional forests, open woodlands, permanent wildlife openings, old fields, maintained rights-of-way, and balds.</p> <p>Percentage objectives within prescriptions, which were the focus of many comments, are for early-successional forest only, and are calculated on the basis of the amount of forested land within a prescription block. Other types of early-successional habitat within the block are treated as non-forest and, therefore, are not included in percentage calculations. Presence of these other types is meant to supplement early-successional forest objectives in determining overall abundance of early-successional habitats. Objectives for some of the other early-successional types have also been set in the plan. Other types are acknowledged as present, but their abundance was not deemed enough of an issue for specific objectives to be set in the revised LMP.</p> <p>Comments calling for both higher and lower objectives for early-successional forest were common. Commenters in favor of higher objectives included state wildlife management agencies, wildlife professional organizations, hunting and game species conservation organizations, and bird conservationists. In some cases, these commenters suggested specific objective levels, generally ranging from 5 to 15 percent forest-wide. Commenters in favor of lower objectives included environmental organizations and those interested in low intensity management strategies and undisturbed mature forest conditions. These commenters frequently pointed to openings created by natural disturbances and canopy gaps from natural tree fall, along with private lands, as habitat sources that reduce the need for creation of early-successional forest on national forest lands.</p> <p>In a recent review paper by disturbance ecologist Craig Lorimer (Historical and ecological roles of disturbance in eastern North American forests: 9,000 years of change. Wildlife Society Bulletin 2001, 29(2):425-439), Lorimer concludes: “Deciding on the optimal amount of early successional habitat on public lands is a complex ecological and social issue that can be guided only in part by scientific evidence.” The diversity of perspectives expressed in comments reflects the complexity of this as a social issue. To provide for this diversity of views, as well as a for a diversity of habitats, the CNF defined four mixes or “options” of successional forest conditions to be assigned to specific portions of the national forest landscape (see definitions of options in Appendix B of the EIS, in the section entitled “Inventorying and Monitoring Institute (IMI) Effects Analysis Process). These options are allocated to the landscape through prescription assignments after considering a variety of factors, including successional habitat abundance and distribution across the forest, settings for other multiple uses, and legal and logistical constraints on management opportunity. The CNF allocated successional forest options in the revised LMP in a mix that provides the best balance in meeting the wide range of public desires evident in the comments.</p> <p>Option 1, which has no early-successional forest objective, is defined to recognize there are many portions of the national forest where creation of early-successional forest through management is not legal, feasible, or desirable. Such areas include Wilderness, areas of rugged terrain, and areas sensitive because of other resource uses and values. Forested lands of this type predominately move toward old growth conditions and provide optimal habitat for late-successional forest species. The selected alternative allocates 44% of the to this option.</p> <p>Option 2, which also has no early-successional forest objective, but which may include up to 4 percent in early-successional forest, is defined to recognize there are portions of the CNF where early-successional forest is not a priority, but may be desirable at low levels to increase habitat diversity and meet other multiple-use needs. Such areas may include recreational, aesthetic, or late-successional forest wildlife emphasis areas. As with Option 1, these areas eventually are dominated by late-successional and old growth forests. The selected alternative allocates 0% to this option.</p> <p>Option 3 has an early-successional forest objective of 4 to 10 percent of forested acreage. It is defined to provide an intermediate mix of successional forest habitats, as well as to allow diversification of forest age classes for forest health, conversion of forest types for ecological restoration, and provision for other related multiple uses. If implemented in a fully regulated way, this objective would result in forests growing to 100 to 250 years before being regenerated (however, in reality some may be regenerated earlier and some may be maintained as old growth). This mix still provides for a general increase of older forests relative to current conditions. Both early- and late-successional forest species find habitat in these areas. The selected alternative allocates 48% to this option.</p> <p>Option 4 has an early-successional forest objective of 10 to 17 percent of forested acreage. It is defined to provide areas that are optimal for early-successional forest dependent wildlife based on recommendations in the scientific literature. It also will allow accelerated diversification of forest age classes and restoration of desired forest types. Implemented in a fully regulated way, this objective results in forests growing to 60 to 100 years before being regenerated (however, in reality some may be regenerated earlier and some may be maintained as old growth). The selected alternative allocates 9% to this option.</p>
7-249	Public Concern: The Forest Service should account for naturally occurring canopy openings in the analysis of early successional habitat, and implement management based on natural processes.	Some commenters expressed dissatisfaction with our approach of not counting early-successional forest patches of less than two acres towards early-successional forest objectives. This approach is used for two primary reasons. First, some species, such as prairie warblers and golden-winged warblers, are restricted to, or prefer, larger habitat patches. Meeting early-

		<p>successional forest objectives through provision of many small patches would not meet their habitat requirements. Second, there is a limit to the size of patches that can be efficiently tracked in inventories and analyzed for habitat availability. Two acres was the smallest unit deemed practical to try to map and track in inventories, and is considerably smaller than current inventories typically track. It is also typically the largest size of opening created during group selection treatments; larger openings are generally considered even-aged or two-aged patches. The CNF fully recognizes that openings and canopy gaps that are less than two acres, whether created by management or of natural origin, provide a habitat condition with some early-successional characteristics that are important to some species (see further response related to “gap-phase dynamics” below). Our recognition of the need for these conditions is reflected in both canopy gap objectives (see Objective 12.02 in Chapter 2 of the revised LMP) and old growth objectives (See Goal 16 in Chapter 2 of the revised LMP). To provide for all species, however, it is necessary to provide the full spectrum of successional forest habitats: larger patches of early-successional forest, late-successional mature forest with canopy gaps, and mid- and late-successional forest with relatively closed canopies.</p> <p>Some commenters express that analysis of need for early-successional forest habitat was deficient in the draft documents because the CNF didn’t make more effort to predict or account for the amount of early-successional forest created by natural disturbance. Natural disturbances that create early-successional forest patches of desired structure and size will be counted toward objectives for this habitat. Where natural disturbances create enough habitat by themselves, management efforts to create these conditions will not be needed.</p> <p>In the review paper cited above, Lorimer states that predicting frequency of more severe natural disturbances (the kind that would create desired early-successional forest patches) is difficult because they are highly episodic and spatially heterogeneous. Lorimer goes on to state: “...the episodic nature of large natural disturbances creates a sort of ‘feast or famine’ environment that may subject early successional animal populations to erratic fluctuations...” Such feasts and famines may be especially extreme when looking at the smaller natural landscapes represented by national forests, surrounded by private lands that may be converted to nonforest. Successional forest objectives are designed to reduce the feast and famine swings for early-successional forest species, while providing ample habitat for mature forest species.</p> <p>Some commenters suggest that early-successional forest on private lands be used to meet objectives for such habitat. Presence of quality early-successional habitat on surrounding private land should be part of project-level analysis, and may lead to decisions to provide lower levels of this habitat on national forest lands. However, at this strategic planning level, private lands cannot be counted upon with certainty to provide these habitat conditions, nor will they be available to support the full spectrum of multiple uses associated with these conditions. In addition, regulations require that habitat be provided to support viable populations on lands covered by the LMP, which does not include private lands. Despite the revised LMPs recognition of the importance of early-successional forest habitat, the CNF is expected to continue to provide a successional forest mix dominated by late-successional forests [see sections 8.1.2 and 8.1.3 of the EIS], especially when compared to the mix found on private lands [refer to all of section 6. in Chapter 3 of the EIS].</p>
7-251	Public Concern: The Forest Service should provide sufficient early successional habitat.	See response for concern 2-5.
7-251.c	Based on good science and to benefit wildlife	The CNF objective for high elevation early successional habitat is 1000 acres. The prescriptions under Alternative I were mapped based on Regional design criteria, and the capability of the land based on Land Type Association and social values. A wide range of alternatives were considered, with varying levels of proposed active management.
7-251.e	To manage forests for dependent species based upon sound science.	<p>A range of alternatives are considered; containing a wide range of potential early successional habitat. In terms of existing conditions of game populations, the counties that contain CNF land continue to produce record numbers of harvested turkey, black bear and white-tailed deer. No data are available for bobwhite quail, but they have likely always been relatively rare on the Forest due to it’s forested landscape condition.</p> <p>The CNF coordinated closely with the Partners in Flight Blue Ridge plan in development of Alter native I. Alternative I has the potential to make great strides towards meeting many of those objectives, including restoration of spruce –fir habitat, creation of canopy gaps in middle-aged cove forest, restoration of xeric pine and pine-hardwood forests, and maintenance of high elevation early successional habitat</p>
7-253	Public Concern: The Forest Service should specify minimum standards for the amount of early successional habitat.	The regional FWRBE template for habitat management direction (on which the CNF plan is based) did not specify inclusion of a minimal level of early successional habitat. The CNF LMP contains a minimal level for high elevation early successional habitat. See response for concern 7-244.
7-254	Public Concern: The Forest Service should specify 0-4 percent for early successional mix habitats, and change the 10-17 percent habitat allocation to 4-10 percent early-successional habitat.	The regional FWRBE template for habitat management direction was used to form desired condition statements for each prescription. See response for concern 7-244.
7-256	Public Concern: The Forest Service should specify that 4-10 percent of acreage will be maintained as early successional forest.	See response to 7-253 and 7-254
7-259	Public Concern: The Forest Service should clarify text and tables describing quantities of high elevation early-successional habitat, and maintain all current acreage or increase acreage.	The objective for high elevation early successional habitat has been increased in response to this and other comments. The existing acreage of high elevation early successional habitat in the EIS is based on best available data, but is likely a very liberal (high) estimate.
7-260	Public Concern: The Forest Service should not create 4-5 percent of early successional habitat within forests.	See response for concern 2-5. See also the Record of Decision for the reason for selecting the preferred alternative.
7-261	Public Concern: The Forest Service should specify how the amounts of early successional habitat were determined and the reasoning used.	See response for concern 7-244.
7-261.a	Because a range of ages and species are needed for biodiversity and sustainability	See 7-254 , 7-253. Alternative I was developed using Regional design criteria and was based on the physical capability of the

		land (Land Type Associations) balanced with social values.
7-262	Public Concern: The Forest Service should specify standards for acreages of early successional forest with balanced age classes at all elevations.	Early successional habitat objectives are based on management prescriptions and not forest type. These objectives are generally for all elevations in the management prescription. Some additional objectives specific to special habitats above 3,000 feet.
7-266	Public Concern: The Forest Service should use utility rights-of-way as the bulk of early successional acreage.	In order to maximize habitat productivity, the CNF would like to retain the flexibility to utilize both vegetation management and prescribed burning as tools to create this habitat in a spatially desirable fashion. This strategy should cluster early successional habitats created by rights of way with other types of young forest to maximize habitat potential. One commenter suggested that utility rights-of-way be used to provide the bulk of early successional habitat. While these areas can provide important habitat for a number of species, they are clearly not sufficient in terms of abundance, distribution, patch size and shape, or diversity of condition to meet all species viability needs or to provide for the desired level of multiple-uses associated with early-successional habitats.
7-268	Public Concern: The Forest Service should clarify text and tables in the proposed alternatives and provide a rationale for departure from the current plan.	The allocation of prescriptions was allocated in a deliberative fashion, and reviewed on several occasion. The assignment of successional mix option, referred to in the "successional forested habitats" section in Chapter 3 of the EIS like wise was established in a deliberative fashion, based on compatibility with the desired condition of the various prescriptions. The resulting values displayed in the tables that you mention are a result of modeling and are estimates used for the basis of comparison of alternatives.
7-272	Public Concern: The Forest Service should allow timber harvest in riparian corridors to support early successional habitat.	Integrated Pest Management is allowed in all management prescriptions compatible with vegetative manipulation. This allows for manipulation of timber in riparian prescriptions when forest health is a concern.
7-279	Public Concern: The Forest Service should increase early succession goals in less restrictive prescriptions.	See response for concern 7-244.
7-280	Public Concern: The Forest Service should increase the amount of early successional habitat by protecting, maintaining, and restoring habitats such as mountain wetlands and high elevation bald edges.	Objective 21.01 lists the types of habitats that will contribute to this habitat objective, including young regenerating forests and open woodlands created by prescribed fire.
7-281	Public Concern: The Forest Service should create and maintain early successional habitat.	See response to concerns 7-254, 7-253, 3-248
7-281.a	Using a variety of treatments	These treatments fall within the silvicultural options specified in Alternative I, but are site-specific decisions and not plan level decisions. The creation of canopy gaps in mid-aged mesic forest is an example (see Objective 12.02).
7-282	Public Concern: The Forest Service should increase early successional habitat in riparian corridors.	See response to concern 3-248.
7-283	Public Concern: The Forest Service should not create early successional habitat in riparian areas.	The creation of this habitat is permissible under the Riparian Prescription (RX 11) for riparian dependent species. The majority of riparian functions and values are associated with older forests, and that condition will prevail. The creation of this habitat is permissible under the Riparian Prescription (RX 11) for riparian dependent species. Since the majority of riparian functions and values are associated with older forests, that condition will prevail. See response to concern 3-205.
7-286	Public Concern: The Forest Service should analyze the cumulative effects of the proposed increase in forest edge.	The CNF LMP has direction to periodically evaluate landscape level land use conditions of public and private lands. This will help track changes in forest interior habitat conditions due to management on public lands as well as adjacent private lands. The EIS discloses the environmental effects, including cumulative effects of the proposed programmatic alternatives commensurate with the LMP stage of decision making. Forest Plans do not generally make final irreversible or irretrievable decisions. See also the responses to comments 3-91.
7-288	Public Concern: The Forest Service should specify minimum percentages for early successional habitats.	See responses to concerns 7-253, 7-254. The CNF used the FWRBE template as a guide for setting desired condition ranges for each prescription. Rather than assigning specific targets, the flexibility of a range allows local land capability and restoration needs to drive the percentages of young forest present. This is a project level decision.
7-288A	Public Concern: The Forest Service should adequately address the role of fire in the forests of the Southern Appalachian.	See response for concern 3-561.
7-290	Public Concern: The Forest Service should, within management prescriptions, clarify the desired mix of early successional habitats for bears and other species.	Objective 12.01 lists the types of treatments that will be counted towards creation of high elevation early successional habitats, which include regenerating forests and open woodlands created by prescribed fire. Acreages of rights of way and balds have been removed from this objective, based on discussions with Partners in Flight representatives and the Migratory Bird Office of FWS.
7-296	Public Concern: The Forest Service should increase the amount of early successional habitat.	See response to concerns 7-253, 7-254 3-248.
7-299	Public Concern: The Forest Service should conduct timber harvest and active management.	Objectives for creation and maintenance of 1000 acres early successional habitat above 3000 feet are in Chapter 2 of the revised LMP. See response for concern 7-83.
7-299.a	To benefit the golden-winged warbler	CNF LMP Objective 12.01 sets acreage of high elevation early successional habitat at 1000 acres.
7-299.b	To maintain species dependent on young forest habitat	No evidence has been provided to demonstrate there is a viability concern for ruffed grouse on the CNF. Although overall regional declines have been recognized, NatureServe global ranks indicate that the species is secure. The local issue with ruffed grouse focuses on social demand for hunting. The LMP viability analysis showed that relatively few viability concern species are obligates of young forests. However, the few obligate species are significant, and the CNF Objective 12.01 targets 1000 acres of early successional high elevation forests.
7-300	Public Concern: The Forest Service should maintain high elevation balds.	Balds are protected and restored under Prescription 9F (Rare Communities).
7-302	Public Concern: The Forest Service should complete an analysis of relative resource values in allocating lands suitable for	36 CFR 219.12(g)(1) instructs forest plan development by requiring an analysis of expected outputs during the planning

	<p>timber production.</p>	<p>period. It suggests use of outputs which include marketable goods and services as well as non-market items, such as recreation and wilderness use, wildlife and fish, protection and enhancement of soil, water, and air, and preservation of aesthetic and cultural resource values. These are the resources the forest EIS has undertaken to show a present net value as required by 36 CFR 219.</p> <p>The CNF presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). The forest has discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals, range) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods, we have chosen to discuss them in a narrative fashion as part of the assessment of net public benefits.</p> <p>Many of the “ecosystem services” provided by forested land, such as flood control, purification of water, recycling of nutrients and wastes, production of soils, carbon sequestering, pollination, and natural control of pests; and externalized costs of resource extraction, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource use and development, are considered to be effects remote from resource management on the CNF. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219.</p> <p>Contrary to what the commenter claims, logging does not necessarily cause most ecosystem services to be significantly diminished or entirely eliminated. Logging is only conducted on a portion of all NFS lands, and the interval between repeat entries onto the same area is often measured in decades. When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption of services is only temporary. Finally, it is important to recognize that some ecosystem services – e.g., wildlife habitat – may actually benefit from logging. This last point is indicative of a larger problem. The commenter focuses exclusively on the potential adverse effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.</p> <p>Lastly, the CNF does not use its socio-economic analysis quantified measures and indexes as the sole means of displaying alternative inputs (FSM 1970.8(5)). Such a value is one piece of information for the decision maker to use in making selections among alternatives. Other resources that are impacted are discussed qualitatively. Their consequences in forest management are decided along with the monetized resource in arriving at an alternative that maximizes net public benefits. After reviewing the planning documentation and comments from the public participation, the determination of the best alternative which maximizes public net benefits is left to the judgment of the decision maker.</p> <p>CNF activities are governed by a large number of rules and regulations designed to mitigate negative impacts or otherwise protect forest resources. In the planning process these benefits associated with regulations are seldom quantified in dollar terms. The costs for achieving these benefits are in the form of increased operating costs and reduced timber revenues.</p> <p>Therefore, it is the U.S. Forest Service’s policy to fully enumerate the dollar values of all market and non-market benefits and costs in the planning process that can reasonably be expected to occur in an attempt to provide as much relevant information as possible to aid in making good planning decisions.</p>
<p>7-308</p>	<p>Public Concern: The Forest Service should complete an analysis of relative resource values in allocating lands suitable for timber production.</p>	<p>36 CFR 219.12(g)(1) instructs forest plan development by requiring an analysis of expected outputs during the planning period. It suggests use of outputs which include marketable goods and services as well as non-market items, such as recreation and wilderness use, wildlife and fish, protection and enhancement of soil, water, and air, and preservation of aesthetic and cultural resource values. These are the resources the CNF DEIS has undertaken to show a present net value as required by 36 CFR 219.</p> <p>The CNF has presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). The forest has discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals, range) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods, we have chosen to discuss them in a narrative fashion as part of the assessment of net public benefits.</p> <p>Many of the “ecosystem services” provided by forested land, such as flood control, purification of water, recycling of nutrients and wastes, production of soils, carbon sequestering, pollination, and natural control of pests; and externalized costs of resource extraction, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource use and development, are considered to be effects remote from resource management on the CNF. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219.</p> <p>Contrary to what the commenter claims, logging does not necessarily cause most ecosystem services to be significantly diminished or entirely eliminated. Logging is only conducted on a portion of all NFS lands, and the interval between repeat entries onto the same area is often measured in decades. When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption of services is only temporary. Finally, it is important to recognize that some ecosystem services – e.g., wildlife habitat – may actually benefit from logging. This last point is indicative of a larger problem. The commenter focuses</p>

		<p>exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.</p> <p>Lastly, the Forest Service does not use its socio-economic analysis quantified measures and indexes as the sole means of displaying alternative inputs (FSM 1970.8(5)). Such a value is one piece of information for the decision maker to use in making selections among alternatives. Other resources that are impacted are discussed qualitatively. Their consequences in forest management are decided along with the monetized resource in arriving at an alternative that maximizes net public benefits. After reviewing the planning documentation and comments from the public participation, the determination of the best alternative which maximizes public net benefits is left to the judgment of the decision maker.</p> <p>U.S. Forest Service activities on the forest are governed by a large number of rules and regulations designed to mitigate negative impacts or otherwise protect forest resources. In the planning process these benefits associated with regulations are seldom quantified in dollar terms. The costs for achieving these benefits are in the form of increased operating costs and reduced timber revenues.</p> <p>Therefore, it is the U.S. Forest Service's policy to fully enumerate the dollar values of all market and non-market benefits and costs in the planning process that can <i>reasonably</i> be expected to occur in an attempt to provide as much relevant information as possible to aid in making good planning decisions.</p>
7-310	Public Concern: The Forest Service should not base management decisions on a successional forest model.	See the response to concern 7-437 and 3-585.
7-311	Public Concern: The Forest Service should address the adequacy of interpretation of the Spectrum modeling.	See below.
7-311a	Question - What are the linear programming (LP) decision variables used in the SPECTRUM model formulations?	Response - The SPECTRUM model is comprised of analysis units (areas of land) and different silvicultural management options are available to each analysis unit, including the option of "doing nothing". These silvicultural options include different combinations of thinnings, final harvest methods (e.g., clearcutting, shelterwoods, group selection), and different rotation ages. These different options comprise the "decision variables" in the model.
7-311b	Question - What is the LP solution algorithm? Does SPECTRUM use the Simplex method, an integer programming solution or a heuristic solution algorithm?	Response - SPECTRUM actually uses a linear program software program called C-WHIZ, which in turn uses the Simplex method.
7-311c	Question - In the SPECTRUM LP solutions, will any specific forest analysis unit drop out of the timber harvest solution if it has a negative NPV? In other words, does the LP solution retain analysis units in the harvest solution that are themselves unprofitable to harvest?	Response - This depends on the objective function and the set of constraints being used. In determining suited acres, lands can have a negative NPV and still be a part of the suited land base. There are three "stages" to determining suitability, and a part of that analysis is based on meeting plan objectives. If some lands with a negative NPV are needed to meet a particular objective (which would be entered into the SPECTRUM model as a constraint), then they could become a part of the suited land base.
7-311d	Question - In the SPECTRUM model how are costs and benefits (revenues) determined / derived?	Response - The different costs and benefits are derived from different sources. These are documented in Appendix B of the EIS and in the process records.
7-311e	Question - Appendix B discloses that it uses timber values derived from SPECTRUM for lands suited for timber. But values for timber from unsuited lands are also included. It's unclear how these values are derived. What factors cause the values to be different? Do greater harvesting costs play a role?	Response - The SPECTRUM model was used to estimate timber volumes and value from the "suited acres", where entries would be on a "scheduled" basis. On "unsuited" lands, since entries would be made on an "as needed" basis and are not "planned" or "scheduled", a different methodology was used to make an estimate of what these volumes might be in the future. On the suited acres, the timber value is dependent upon the mix of species for a particular site. Different species are in different "appraisal groups", with each "appraisal group" having a different value. So each timber yield table would have different volumes in the different appraisal groups, and therefore different values. From these suited land calculations, an average value per MCF was calculated by dividing total timber value by total volume. This average value per MCF was then applied to the estimated volume that would come from the "unsuited acres".
7-311f	Question - In SPECTRUM, what is the difference between long-term sustained yield and perpetual timber harvest constraints? Davis and Johnson in Forest Management (McGraw-Hill, p. 542) describe long-term sustained yield and perpetual timber harvest as the same concept.	Response - In terms of a definition, these two terms basically mean the same thing. But different modeling constraints are needed to accomplish the concept. The long-term sustained-yield (LTSY) constraint is used to make sure the harvest in any particular decade does not exceed the LTSY. The perpetual timber harvest constraint is used to make sure there is enough inventory at the end of the planning horizon in the model to continue producing the LTSY into the future.
7-311g	Question - In SPECTRUM, what is meant when Appendix B says land allocated to timber harvesting is "hardwired"?	Response - In developing the alternatives, management prescriptions were allocated to different parts of the Forests. These management prescriptions determined the desired conditions to be achieved. Also, for some management prescriptions all the lands are classified as "not suited for timber production", while other management prescriptions could have lands classified as "suited for timber production" (depending on further analysis). It is these "desired conditions" and "suitability" classifications that were "hardwired" into the SPECTRUM model. The SPECTRUM model was not used to make the allocation decisions, only to make an estimate of what would happen within an alternative with its particular mix of management prescription allocations.
7-311h	Question - Do the costs in SPECTRUM include both the fixed and variable costs of Forest Service timber management and harvesting? It appears from reading the documentation provided that fixed costs were left out of the equation due to their effects on the per unit cost. How many miles of improved roads and acres of steep slope were found in determining the cumulative effect to forested acres in setting Spectrum analysis units? What criteria were used to determine that this reduction in timber yields was an accurate method of dealing with the problem? How much were yields reduced as a result of roads? Steep slopes? What statistical criteria were used to determine the reduction percentages or amounts?	<p>Response - The costs in SPECTRUM only included variable costs, because the fixed costs are essentially a "given". Fixed costs continue regardless of the alternative level of output. They constitute Forest Service overhead costs that would not vary by alternative. SPECTRUM is used to compare the estimated costs and benefits associated with implementing various activities in order to determine the best mix to meet to objectives and constraints. 36 CFR 219.14 also specifies that "direct" benefits be compared with "direct" costs. The fixed costs are included in the calculations of the present net value of each alternative.</p> <p>Distances from roads and slope categories were used in determining the analysis units in SPECTRUM. This way different roading costs could be assigned to the different analysis units, and differences in operating costs could be assigned to acres in different slope categories. The timber yields in SPECTRUM are on a per acre basis and these per acre yields were not reduced simply because of the distance from a road or the slope they were located on.</p>

7-311i	Question - In alternatives B and I, where timber production is a byproduct of management to restore and maintain resources, forest structure, processes, habitats, etc., it is unclear how the SPECTRUM model can spit out a given output per decade. More specifically, in alternative I, how can silvicultural activities intended for ecological management necessarily provide a “stable supply of wood products”? Why would “some of the best sites that are currently accessible” need to be managed to provide high-quality sawtimber if this isn’t the purpose of the alternative? In addition, it seems odd that given the substantial difference in emphases between the alternatives, that land classified as suitable for timber production would vary so little between alternatives. Please explain how this came to be.	Response - SPECTRUM was used to estimate what kind of outputs would result from meeting the desired conditions of the management prescription allocations. Some of these desired conditions specified that certain percentages be maintained in certain age classes or “structural” conditions. In order to maintain these conditions, silvicultural activity would need to occur on a regular basis, and this is what would provide a “stable supply” of products. In terms of the differences between alternatives, each alternative had an overall “theme”. This “theme” was then used as a “guide” to determining the allocations of the management prescriptions. However, land managed under, say, Management Prescription 4.F. in Alternative A, is the same as land managed under Management Prescription 4.F. in Alternative G. It is the land allocation of the management prescriptions that makes up the differences between the alternatives, not the management activities within a particular management prescription.
7-311j	Question - What percentage of total regional forested land is made up of national forest timber-producing acres? What percentage of total forested land in the state do national forest system acres represent?	Response - Government agencies hold 20.8 percent of the 4.9 million timberland acres in the Southern Appalachian region (“Southern Appalachian Assessment; Social, Cultural, Economic Technical Report”, p. 86, July 1996).
7-311k	Question - Gross receipts for the purchase of National Forest timber are broken down into four categories: 1) the money paid to the Forest Service for trees standing in the woods (stumpage); 2) the value determined by the Forest Service for “purchaser credit” roads accepted as a payment in kind; 3) “associated charges” (primarily road maintenance) which the purchaser is required to pay in addition to stumpage; and 4) interest and penalties paid by the purchaser through the life of a sale. What are the dollar values associated with each category over the timber price time series (especially category 4 - interest and penalties)?	Response - “Purchaser road credits” and the “interest and penalties paid by the purchaser through the life of a sale” were not included in the estimates of the timber revenues used in the SPECTRUM model or the present net value calculations.
7-311l	Question - When and where are the environmental effects of timber harvesting included in the analysis?	Response - The environmental effects of timber harvesting are described in Chapter 3 of the EIS.
7-311m	Question - It is not clear in the DEIS how purchaser road credits were dealt with. Were they treated as a cost or revenue? Why?	Response - The Forest Service no longer uses purchaser road credits and therefore they were not a part of the analysis. The total costs of constructing and re-constructing timber roads were included as a cost in the SPECTRUM analysis.
7-311n	Question - What statistical methods / software were used to “trend” the timber price time series? Why were these methods / software used?	Response - In order to derive an “average value” per MCF for the different appraisal groups, stumpage prices were converted to 2000 dollars by the Gross Domestic Price Deflator Index. The SPECTRUM model used these 2000 prices to provide a constant 2000 dollar value estimate in the future.
7-311o	Question - The timber price time series, 1985 to 1996, is a very short time series to use for a 200-year trend projection. Was this thought to be a typical timber price time series? Why?	Response - When we started the process to determine “average” timber values, the years 1985 to 1996 were simply the years where we had some historical data available to analyze.
7-311p	Were National Finance Center records or TSPIRS data used as the basis for timber production and management costs? The documentation suggests both were used. How were they combined? It appears that an ad hoc procedure was used to determine timber production and management costs. Please disclose the instructions and rationale for the data collection direction given on the Forest to address this issue.	See the response to concern 7-108.
7-313	Public Concern: The Forest Service should not use Continuous Inventory of Stand Conditions data to determine the current composition of the National Forest System lands.	The goal of the CNF is to use the best available data in the preparation of the revised LMP. The best available data for vegetation included the CISC data. CISC data has always been mandated to be kept current and accurate by field exams over time. The CNF determined that the CISC record is valid for the purposes used in the revision analysis. When field examinations indicate that site specific conditions have changed, direction in the revised LMP will guide which activities are allowed.
7-314	Public Concern: The Forest Service analyses in Appendix F should better reflect natural processes, operability standards, and budget constraints.	The suitable acres, sale program, silvicultural selections shown in LMP Appendix F are estimates of the actions/activities needed to meet the desired conditions established in the LMP.
7-316	Public Concern: The Forest Service should conduct timber harvest for environmental reasons.	See response to concerns 7-102, 7-534, 7-94 and 7-83.
7-316.b	For forest health.	Less than 50% of the CNF is in management prescriptions that are suitable for timber management; however, provisions for using integrated pest management practices to address forest health issues are included in unsuitable management prescriptions that are compatible with active management.
7-316.c	To benefit wildlife	In terms of existing conditions of game populations, most counties that contain CNF land continue to produce record numbers of harvested turkey, black bear and white-tailed deer. A range of alternatives were considered; these called for creation of a wide range of acreage of early successional habitat. Alternative I was developed using Regional design criteria and was based on the physical capability of the land (Land Type Associations) balanced with social values. See 7-253 , 7-252??
7-319	Public Concern: The Forest Service should evaluate the effects of timber harvest on soil nutrient depletion.	Based on past research conducted at Coweeta Forest Laboratory, the effects of timber harvest on nutrient depletion that have been conducted in the past have produced positive results. (Southeastern Experiment Station. Asheville, N.C.)
7-320	Public Concern: The Forest Service should harvest timber in a manner that does not negatively affect watershed health.	Timber harvest and watershed health are not necessarily mutually exclusive. Timber harvest as a tool to achieve necessary regeneration and forest stand improvement may be a means to promote watershed health. The Forestwide and Riparian Prescription standards contained in the LMP protect water quality and the aquatic resource.
7-339	Public Concern: The Forest Service should not conduct commercial timber harvest because of environmental impacts.	See response for concern 7-94, 7-36 and 7-197.
7-341	Public Concern: The Forest Service should monitor and enforce use of appropriate timber harvest methods.	All timber harvest activities are analyzed in an environmental assessment where mitigation measures are included. Mitigation is then implemented as part of the timber sale contract and monitored and enforced on each timber sale by a certified Timber Sale Administrator. Timber sale contract clauses are developed to ensure that all harvest activities and mitigation measures established in the LMP and site specific analysis are specified to the contractor. The sale administrator ensures contract requirements are met.

7-343.b	Without conducting clearcutting or other destructive activities	No massive clearcutting is proposed in the Revised Plan. Clearcutting is proposed as a regeneration method for Virginia pine because of shallow root systems. Partial cutting of Virginia pine results in wind throw and other damage. The projected level of clearcutting for Virginia pine in the first decade after implementation averages just over 320 acres per year or approximately .5% of the total CNF acres per 10 year period.
7-344	Public Concern: The Forest Service should focus forest management on recreation and environmental protection resource activities.	The theme of Alternative I (the preferred alternative for the revised LMP) is displayed in the "Alternatives considered in detail" section in Chapter 2 of the EIS. The theme identifies watershed restoration, non-motorized settings and reduction of the road system as guiding principals. The allocation of prescriptions for the revised LMP is the result of a deliberative process by the staff of the CNF to address the public issues, management concerns and resource protection and development opportunities in a fashion consistent with the theme of the alternative.
7-345.a	Public Concern: The Forest Service should conduct timber harvest. To benefit recreation	The revised LMP goal in Chapter 2, "Recreation- Developed, Dispersed and Backcountry" section recognizes the need to provide opportunities for hunting, fishing and wildlife viewing/nature study. The range of alternatives developed in the EIS represent a variety of management prescriptions that provide habitat for big and small game. Refer to table, "Estimated Total Acres of Big & Small Game Emphasis Areas by Alternative" under direct/indirect effects for Dispersed Recreation in the EIS. Appendix B of EIS discloses the assumption that use of General Forest Areas (GFAs) would slightly increase due to more opportunities for access and hunting.
7-347	Public Concern: The Forest Service should not harvest timber.	See response for concern 7-197, 7-94 and 7-36.
7-348	Public Concern: The Forest Service should expend greater resources on recreation trails, infrastructure, and services.	The projected expenditures for implementation of Alternative I, which represents the revised LMP, are displayed on Appendix H or the Revised LMP.
7-348.a	Because recreation provides greater economic benefits than timber harvest	Appendix B of the EIS explains much of the analysis involved with development of the revised LMP. The table labeled "Budget and Employment Data" displays the comparison of expenses involved with implementation of the various alternatives. The table indicates that Alternative I (representing the revised LMP) has increases in expenditures in both timber management and recreation, over Alternative F, which represents the 1986 LMP.
7-349	Public Concern: The Forest Service should expend greater effort on preserving resources and promoting ecotourism.	The themes of Alternative I (representing the revised LMP) are displayed in the "Alternatives Considered in Detail" section of Chapter 2 in the EIS are: a) Emphasize ecosystem restoration and maintenance. b) Emphasize watershed restoration. c) Maintain and restore riparian areas. d) Emphasize sustainability of diverse ecosystems. e) Promote and maintain a variety of old growth communities. f) Prioritize maintenance of forest health g) Provide high quality nature-based recreation opportunities. h) Emphasize non-motorized settings with natural appearing landscapes. i) Reduce road system. These themes are promoted with all the direction provided in the revised LMP, and encompass much of your concerns.
7-352	Public Concern: The Forest Service should protect scenic and recreational areas.	Chapter 1 of the EIS identifies "Aesthetics/Scenery Management," "Recreation Opportunities/Experiences" and "Roadless Areas and Wilderness Management" as significant issues. These issues were used to develop alternatives for the LMP revision process. These alternatives are described in Chapter 2 under "Alternatives Considered in Detail" and then compared under "Comparison of Alternatives by Issue." Alternative I provides high quality nature-based recreation opportunities, emphasizes non-motorized settings with natural appearing landscapes and reduces the road system. Refer to Chapter 3 of EIS for effects related to "Wilderness and Roadless Areas," "Scenery" and "Special Areas," which includes designated Scenic Areas.
7-352.a	For multiple reasons	See response for 7-352.
7-355	Public Concern: The Forest Service should not harvest timber in areas considered "unsuitable" for timber harvest.	The suitability classifications used in forest planning may be confusing. The process for determining lands "suitable for timber production" is defined in the regulations at 36 CFR 219.14 and is explained in Appendix F of the revised LMP and Appendix B of the EIS. However, the regulations also specify that some harvesting activities can occur on lands classified as "not suitable for timber production". 36 CFR 219.27(c)(1) states that "No timber harvesting shall occur on lands classified as not suited for timber production ... except for salvage sales, sales necessary to protect other multiple-use values or activities that meet other objectives on such lands if the forest plan establishes that such actions are appropriate." The LMP (Chapter 2, "Vegetation and Forest Health" section) recognizes that these activities may occur on lands classified as not suited for timber production. The primary difference between lands classified as "suited" versus "not suited" for timber production has to do with whether or not the lands will be managed on a "regulated" (or scheduled) basis. (The definition for "timber production" is "the purposeful growing, tending, harvesting, and regeneration of <i>regulated</i> crops of trees ... (36 CFR 219.3).) However, regardless of whether lands are classified as suited or not suited for timber production, any harvesting activities would still need to meet the forest-wide and management prescription standards. Salvage harvesting may occur on lands in management prescriptions that are unsuitable, except for lands withdrawn from management by congress. See response to concern 7-94.

7-357	Public Concern: The Forest Service should specify provisions guiding timber harvest in unsuitable areas.	Objectives for harvesting in unsuitable management prescriptions are in Chapter 3 of the revised LMP. See response for 7-355 above.
7-363	Public Concern: The Forest Service should conduct commercial timber harvest for economic benefits.	See response for concern 7-102, 7-534, and 7-83.
7-363.d	To Workers in wood products industries	The revised LMP is a programmatic statement of goals, objectives, desired conditions and standards. The projected timber activity related to vegetation management and habitat restoration is displayed in appendix H of the revised LMP. The allowable sale quantity, which is a maximum amount of timber sold under normal circumstances off regulated lands, is identified in the "Vegetation and Forest Health" section of Chapter 2 in the revised LMP. The values are 30,429 thousand cubic feet of sawtimber, and 5,684 thousand cubic feet of pulpwood, per year. The projected benefits are displayed in the "Social and Economic Environment" section of Chapter 3 in the EIS.
7-363.e	to local economies.	See response to 7-362.d.
7-366	Public Concern: The Forest Service should not harvest timber for economic reasons.	See response for concern 7-36, 7-94 and 7-197.
7-366.a	Because taxpayers receive no benefit.	See response to 7-362.d.
7-367	Public Concern: The Forest Service should not allow commercial timber harvest for economic benefits.	See response to concern 7-102 and 7-83.
7-368	Public Concern: The Forest Service should not sacrifice the long-term benefits of tourism for short-term benefits of clearcutting.	The use of the "clearcutting" method of regenerating forests is displayed in Appendix H of the revised LMP. The annual amount, limited to Virginia pine, is 338 acres. This limited amount of clearcutting is proposed for prescription areas with scenic objectives that are compatible with timber management activities and not incompatible with tourism. Certainly, economic effects, in addition to environmental effects, was part of the analysis disclosure for the EIS. The decision to select Alternative I, over other alternatives, was made with environmental and economic factors in mind.
7-369	Public Concern: The Forest Service should evaluate the impacts of national forest timber on local markets and pricing.	Local timber market conditions are analyzed in the Forest's Timber Supply and Demand Analysis which is done during the Analysis of the Management Situation (AMS). This document is part of the Process Record and gives the CNF a background for their role in the local market and possible effects on pricing. Such characteristics as growing stock, the CNF's relative share of the total market area of all ownerships, growth-drain ratios to understand if growth exceeds harvest, and Forest Service dependent mills are some of the things this analysis discusses. The CNF has been requested to furnish a summary of their timber analysis in Appendix B for the EIS.
7-373	Public Concern: The Forest Service should utilize the best available science in determining to what extent monetary values can be assigned to non-market goods and services.	The CNF used both market and non-market prices in its economic efficiency analysis. The CNF used values for resource programs suggested in 36 CFR 219.12(g)(1). These values are presented in tables of Appendix B. These tables have been revised for the EIS to better reflect the sources of the valuations. These priced market and non-market values along with program costs are used in a present net value analysis. But this economic analysis of quantified measures is not used as the sole means of displaying alternative outputs (FSM 1970.8(5)). Such a present value analysis is one piece of information for the decision maker to use in making selections among alternatives. Other resources that are non-priced may be discussed qualitatively. Both the priced and non-priced resources in forest management are considered in arriving at an alternative that maximizes net public benefits. After reviewing the planning documentation and comments from the public participation, the determination of the best alternative which maximizes net public benefits is left to the judgment of the decision maker.
7-374	Public Concern: The Forest Service should disclose the instructions and rationale for the data collection direction given to address timber production and management costs.	See response for concern 7-373. See EIS appendix B for a description of how values are determined for the analysis.
7-375	Public Concern: The Forest Service should specify that forests will pursue management actions that will benefit local communities.	Forest plans are a balance between the many competing uses of forest resources. Benefits to local communities were considered during the development of alternatives. Alternative A emphasizes the production of goods and services beneficial to local communities. The Socio-Economic Environment section of the EIS compares the different alternatives in terms of economic impacts. The chosen alternative will be a mixture of preservation and resource uses with both short term and long term goals for resource conditions.
7-378	The Forest Service should require commercial timber companies to pay for all costs to support timber harvest and correct environmental effects	When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Costs for area regeneration are set aside from timber revenues; road construction costs are a part of Forest Service expenditures of the sale; and erosion control is funded by either a "cooperative credit" whereby the timber purchaser deposits monies with the Forest Service to accomplish the control or the purchaser directly does the control. While all costs are not born by the timber purchaser, Timber program expected revenues and expected costs are analyzed via SPECTRUM across the forest to determine the financial efficiency of program. Likewise a present net value analysis is done for the Timber program over the entire 150 year planning horizon.
7-384	Public Concern: The Forest Service should not use tax dollars to subsidize timber harvesting.	The premise of the commenter's statement is flawed. There is an assumption of the future timber or mineral programs on this forest will incorporate a subsidy across all alternatives. For the CNF, the present net value analysis found on pages 423-425 of Chapter 3 of the DEIS estimates that across all alternatives the Timber program is expected to meet its hurdle rate of 4 percent real return to the federal treasury. Clearly, discounted revenues are expected to cover discounted costs over the planning period. Individual timber sales are analyzed before a project is undertaken. Discounted costs and benefits are considered to see if the project will be economically efficient. Sale analyses include costs for roads. If a proposed sale alternative does show a negative return, the decision maker will justify the reason for commencing with the project. Because there are often positive effects on other resource values such as habitat and access for recreation opportunities, there is no mandate for projects to be

		profitable. Timber sale projects are put out for competitive bid of what the market will bear for a given quality of timber. Bidders must bid above a "floor" appraised price before a contract will be awarded. Therefore, construction of roads and timber sales on national forests do not necessarily amount to a "subsidy".
7-386	Public Concern: The Forest Service should conduct NEPA analysis on a range of alternative to providing subsidies to industry.	The premise of the commenter's statement is flawed. There is an assumption of the future timber program on this forest incorporates a subsidy across all alternatives. For the CNF, the Present Net Value analysis found on page 424 of Chapter 3 of the DEIS estimates that across all alternatives the Timber program is expected to meet its hurdle rate of 4 percent real return to the federal treasury. Clearly, discounted revenues are expected to cover discounted costs over the planning period. When individual projects are planned, a discounted cash flow analysis of that proposed sale is also conducted in an Environmental Analysis to show the efficiency of that sale.
7-396	Public Concern: The Forest Service should increase the annual timber harvest volume.	Various levels of timber production were analyzed in the array of alternatives. Projected outputs ranged from an average of just over 800 MCF per year to over 7,000 MCF per year. See Chapter 2 of the EIS for further information of outputs by alternative.
7-398	Public Concern: The Forest Service should lower the allowable sale quantity of timber.	See response to concern 2-5.
7-400	Public Concern: The Forest Service should reduce the amount of forest designated as "suitable" for timber production.	The planning process for the CNF included analysis of a range of alternative management themes. Within these alternatives was a range of levels of timber harvest volumes, and acres of 'suitable for timber production'. The selected alternative does not have the highest level of timber harvest, or suitable acres, but addresses the spectrum of significant issues best in its combination of resource activities and emphases.
7-401	Public Concern: The Forest Service should increase the suitable acreage for timber harvest.	The array of alternatives has varying levels of acreage allocations for management prescriptions 7A, and 9F. For management prescription 11, riparian corridors, acreage allocations remain the same for all alternatives except Alternative F. For 7A, allocations range from a high of over 58,000 acres to a low of 6,600 acres; for 9F, allocations range from over 9,800 acres to a low of around 6,500 acres.
7-413	Public Concern: The Forest Service should limit timber harvest to small diameter trees.	For the CNF revised LMP, timber harvesting is used as a tool to achieve goals and objectives that will mainly be ecosystem restoration and maintenance related, or forest health related. The type of harvest, and what diameter of trees to harvest will be dependent on the goal or objective for any given acre of NFS land.
7-423	Public Concern: The Forest Service should evaluate the effects of clearcutting.	Clearcutting, as a regeneration method, has been studied and there are many published research documents for reference. The revised LMP relies on clearcutting as a restoration tool in Virginia pine stands. The affected area for the CNF is about .5% of the total area per 10 year period.
7-424	Public Concern: The Forest Service should limit the use of clearcutting to areas where restoration is needed.	Clearcutting is proposed as a regeneration method in Virginia pine stands for the purpose of restoration to more naturally occurring forest communities. Naturally occurring communities on most of these sites is mixed upland hardwood-shortleaf pine-pitch pine. Because of shallow root systems, partial cutting in Virginia pine may result in wind throw and other damage. The projected level of clearcutting for Virginia pine in the first decade after implementation averages just over 320 acres per year or approximately .5% of the total CNF area per 10 year period.
7-428	Public Concern: The Forest Service should allow silviculturists to use clearcutting as well as group selection methods as management tools.	The regeneration objectives for all forested communities on the CNF, except for Virginia pine, can be accomplished by methods other than clearcutting.
7-429	Public Concern: The Forest Service should clearcut National Forest System lands.	See response for concern # 7-83
7-431	Public Concern: The Forest Service should not clearcut National Forest System lands.	See response for concern # 7-94.
7-431.a	Because clearcuts do not provide adequate nutrition for deer reproduction	The choice of stand regeneration method is a project-level decision, to be based on site capability and restoration needs. The silvicultural option of clearcutting is permitted under some circumstances by the LMP, but it will not likely be a predominant regeneration method selected during the implementation of this LMP.
7-431.b	Because clearcut areas require years for recovery	An array of alternatives is analyzed in the EIS. Alternative C emphasizes minimal human intervention for managing natural resources. Alternative C is not considered in detail due to reasons described in the EIS. Detailed descriptions of alternatives are located in Chapter 2 of the EIS.
7-432	Public Concern: The Forest Service should address the fact that even-aged management may or may not increase stream temperature.	The riparian corridor associated with Prescription 11 prevents increases in stream temperature due to vegetation management or other management activities. There is a discussion of effects to stream temperature in Chapter 3 of the EIS.
7-435	Public Concern: The Forest Service should analyze and specify the use of even-aged management techniques for oak regeneration.	The CNF has had good success with oak regeneration on upland sites using clearcutting and shelterwood regeneration methods. Regeneration of oak on more productive sites, especially where competition from yellow poplar occurs, has proven more difficult. The revised LMP provides for pre-harvest treatments of understory and midstory vegetation to develop existing oak seedlings to advance growth stage. After canopy disturbance, advance growth oak can compete and reach canopy positions in the regenerated stand. Also available for oak regeneration, where existing natural seedlings are not present, is the availability of high quality northern red oak and white seedlings for planting. Planting can provide a successful means of augmenting existing natural regeneration. Restoration of <i>upland sites</i> from SPB damage and from Virginia pine to naturally occurring forested communities will include oak in mixture with shortleaf pine, pitch pine, and table mountain pine.
7-437	Public Concern: The Forest Service should recognize that current even-aged management perpetuates an even-aged successional forest rather than restoring the natural composition and dynamics of the Southern Appalachian forest ecosystem.	Some commenters expressed dissatisfaction with our approach of not counting early-successional forest patches of less than two acres towards early-successional forest objectives. This approach is used for two primary reasons. First, some species, such as prairie warblers and golden-winged warblers, are restricted to, or prefer, larger habitat patches. Meeting early-successional forest objectives through provision of many small patches would not meet their habitat requirements. Second, there is a limit to the size of patches that can be efficiently tracked in inventories and analyzed for habitat availability. Two acres was the smallest unit deemed practical to try to map and track in inventories, and is considerably smaller than current

		<p>inventories typically track. It is also typically the largest size of opening created during group selection treatments; larger openings are generally considered even-aged or two-aged patches. The CNF fully recognizes that openings and canopy gaps that are less than two acres, whether created by management or of natural origin, provide a habitat condition with some early-successional characteristics that are important to some species (see further response related to “gap-phase dynamics” below). Our recognition of the need for these conditions is reflected in both canopy gap objectives (see Objective 12.02 in Chapter 2 of the revised LMP) and old growth objectives (See Goal 16 in Chapter 2 of the revised LMP). To provide for all species, however, it is necessary to provide the full spectrum of successional forest habitats: larger patches of early-successional forest, late-successional mature forest with canopy gaps, and mid- and late-successional forest with relatively closed canopies.</p> <p>Some commenters express that analysis of need for early-successional forest habitat was deficient in the draft documents because the CNF didn’t make more effort to predict or account for the amount of early-successional forest created by natural disturbance. Natural disturbances that create early-successional forest patches of desired structure and size will be counted toward objectives for this habitat. Where natural disturbances create enough habitat by themselves, management efforts to create these conditions will not be needed.</p> <p>In the review paper cited above, Lorimer states that predicting frequency of more severe natural disturbances (the kind that would create desired early-successional forest patches) is difficult because they are highly episodic and spatially heterogeneous. Lorimer goes on to state: “...the episodic nature of large natural disturbances creates a sort of ‘feast or famine’ environment that may subject early successional animal populations to erratic fluctuations...” Such feasts and famines may be especially extreme when looking at the smaller natural landscapes represented by national forests, surrounded by private lands that may be converted to nonforest. Successional forest objectives are designed to reduce the feast and famine swings for early-successional forest species, while providing ample habitat for mature forest species.</p> <p>Some commenters suggest that early-successional forest on private lands be used to meet objectives for such habitat. Presence of quality early-successional habitat on surrounding private land should be part of project-level analysis, and may lead to decisions to provide lower levels of this habitat on national forest lands. However, at this strategic planning level, private lands cannot be counted upon with certainty to provide these habitat conditions, nor will they be available to support the full spectrum of multiple uses associated with these conditions. In addition, regulations require that habitat be provided to support viable populations on lands covered by the LMP, which does not include private lands. Despite the revised LMPs recognition of the importance of early-successional forest habitat, the CNF is expected to continue to provide a successional forest mix dominated by late-successional forests [see sections 8.1.2 and 8.1.3 of the EIS], especially when compared to the mix found on private lands [refer to all of section 6. in Chapter 3 of the EIS].</p> <p>See response for concern 7-184.</p>
7-459	Public Concern: The Forest Service should address the effects of fire on forest ecosystems.	As described in the EIS, prescribed fire is used for various purposes; fuel reduction, habitat restoration and site preparation. Fuel reduction burns are conducted during the dormant season within areas that have excessive fuel loads with the intent of meeting condition class 1, as described in the LMP. Burning during the dormant season reduces potential adverse effects to non-target vegetation. Restoration burns are conducted during either the dormant or growing seasons and will be tailored to the specific community they occur in to avoid the adverse effects mentioned.
7-467	Public Concern: The Forest Service should address the methods and effects of firebreak construction.	In most cases handlines are used to minimize impacts to riparian areas, SMZ’s and wetlands. These handlines generally remove leaf litter and do not impact the soil. Because of the wet nature of these areas fire tends to go out before reaching the stream channel. .
7-472.a	Community Conversion mentions the use of fire as a major tool for this conversion work. In the description it says the goal is to get on a burning cycle, but never mentions that in communities there is a point that scheduled burning would have to stop to let the forest develop into the desired condition. If the burning is being used to get a community established, it should be clear that once it is in place the use of fire will be stopped or used at longer intervals for other outputs. (Tennessee Wildlife Resources Agency, Nashville, TN - #3093.20.64300.001)	Fire regimes and condition classes will be used to determine burning cycles. Communities in condition classes 3 and 2 will be moved to classes 2 and 1 through the use of prescribed fire. Once the communities are converted to condition class 1 they will be burned as needed within the determined fire regime for maintenance to keep them in condition class 1.
7-472.b	The DEIS plans use prescribed fire to “restore fire regimes within or near an historical range.” Although the DEIS discloses particular communities that are fire dependent, there is no strategy disclosed that would target fire in communities where it would be appropriate. The Forest Service proposes to prescribe burn about 31,000 acres annually for the 15 year life of the plan for a total burned of 465,000 acres, or 73% of the ENTIRE FOREST!!! This is clearly excessive, and no data is presented to show in any manner that this level of disturbance occurred in the Southern Appalachians historically. Western forest managers would be hard pressed to show that 73% of their forest burned on a 15-year rotation. This is clearly wrong and cannot possibly be implemented.	See response to 7-472.a. Prescribed burn acres are based solely on ecological criteria, hazardous fuels reduction, and do not take into account the average number of burning days per year, the existing work force, and budget constraints.
7-480.d	Because preventative fire is less expensive than fighting wildfire	Using prescribed fire in the high arson areas of the CNF reduces the acreage burned by wildfires and makes it safer for firefighters to suppress those fires. Typically cost per acre for prescribed burning runs \$25.00 per acre which includes planning, resources required, and execution of the burn. Suppressing wildfires can range from \$30.00 per acre to hundreds or even thousand of dollars per acre. The cost of a wildfire will depend on the types of resources used. When aircraft is used the cost increases significantly. A wildfire generally causes more damage to the resources because of its uncontrolled nature.
7-480.f	Because it was historically used by Native American Indians	There are several references to the use of Native American Indian fire use in chapter 2 of the LMP and chapter 3 of the EIS in the prescribed and wildland fire section.
7-480.g	Because disturbance is needed for a healthy forest and diversity	No response required.

7-482	Public Concern: The Forest Service should describe the mix of early successional types in the prescription objectives.	Various management activities including prescribed fire, timber harvest, creation of wildlife openings, etc., may result in the creation of early successional habitat across the landscape. The LMP does not infer that fire will be the only management tool used.
7-484	Public Concern: The Forest Service should conduct prescribed burns in combination with timber harvest.	Where appropriate prescribed burns will be conducted in combination with timber harvests.
7-486	Public Concern: The Forest Service should provide an adequate range of alternatives for the amount of acreage that will be subjected to prescribed burns.	The range of alternatives for the prescribed burn acreage has been provided in chapter 3 of the FEIS. Alternative C, which is not considered in detail in Chapter 2 of the EIS, is based on minimal human intervention. Minimal human intervention implies little or no use of prescribed fire and serves as the lower end response to prescribed fire burning acres in the range of alternatives.
7-487	Public Concern: The Forest Service should not use prescribed fire in Southern Appalachian forests.	<p>Fire played an important role in shaping the species rich landscape of the southeastern U.S. Fires of both natural and cultural origin were common on the landscape when the present arborescent flora migrated into the region after the last ice age, 8,000 to 10,000 years ago (Delcourt and Delcourt, 1996). Fire has been a part of the southern Appalachian landscape for longer than its current vegetation has been (Delcourt and Delcourt, 1996)*.</p> <p>LMPs provide direction for desired future conditions of ecosystems. In many cases, fire is a necessary tool to meet those desired conditions.</p> <p>Objectives in Forest Service Manual 5140 are to use fire from either management ignitions or natural ignitions in a safe, carefully planned, and cost effective manner to benefit, protect, maintain, and enhance NFS resources; to reduce future fire suppression costs; and, to the extent possible, to restore natural ecological processes and achieve management objectives adopted in approved forest land and resource management plans.</p> <p>Several comments appear to be associated with the Healthy Forests Initiative. The CNF used local research that discussed how in the southern Appalachian Mountains, the upland pine and oak communities evolved under a short return interval, low intensity fire regime. Key points to the Healthy Forests Initiative are:</p> <ul style="list-style-type: none"> Improving procedures for developing and implementing fuels treatment and forest restoration projects in priority forests and rangelands, in collaboration with local governments. Reducing the number of overlapping environmental reviews by combining project analysis and establishing a process for concurrent project clearance by federal agencies. Developing guidance for weighing the short-term risks against the long-term benefits of fuels treatment and restoration projects. Developing guidance to ensure consistent NEPA procedures for fuels treatment activities and restoration activities, including development of a model Environmental Assessment for these types of projects. <p>Also reference response to concerns 7-184.</p>
7-487.a	Because they should not be managed like a western forest	Objective 24.02 and forestwide standard 96 addresses how the forest will handle prescribe burning in mixed mesophytic and northern hardwood communities. We avoid these areas where possible. Fire is allowed to back into these communities which normally goes out due to increased fuel moisture. In a drier year it will burn some of these areas which would have happened naturally. Excluding these areas in most burns would result in large amounts of dozer line. By using existing features such as roads and streams we can avoid unnecessary impacts created by plowing dozer control lines.
7-487.c	Because it is a cover for timber management	Prescribed fire plays an important role for maintenance of particular upland ecosystems including Dry to Mesic oak Forest, Dry and Dry to Mesic Pine Oak Forest, Dry and Xeric Oak Forest and Xeric Pine and Pine-Oak Forest. However, less than 20% of the CNF will receive treatment by prescribed fire. Maintenance by fire of the systems mentioned above includes reducing the establishment of white pine and Virginia pine.
7-488	Public Concern: The Forest Service should reduce the use of prescribed fire.	<p>There is an objective and standard in the fire management section in chapter 2 of the LMP that addresses how the CNF will handle prescribe burning in mixed mesophytic and northern hardwood communities. The LMPs avoid these areas where possible. Fire is allowed to back into these communities which normally goes out due to increased fuel moisture. In a drier year fire might burn some of these areas which would have happened naturally. Excluding these areas in most burns would result in large amounts of dozer line. By using existing features such as roads and streams we can avoid unnecessary impacts created by plowing dozer control lines.</p> <p>See response for concern 7-184.</p>
7-488.a	For mixed mesophytic and northern hardwood forests	Objective 24.02 and forestwide standard 96 addresses how the forest will handle prescribe burning in mixed mesophytic and northern hardwood communities. We avoid these areas where possible. Fire is allowed to back into these communities which normally goes out due to increased fuel moisture. In a drier year it will burn some of these areas which would have happened naturally. Excluding these areas in most burns would result in large amounts of dozer line. By using existing features such as roads and streams we can avoid unnecessary impacts created by plowing dozer control lines.
7-488.b	Because the forests in the Southeast have high moisture content	The CNF has approximately 392,510 acres of fire adapted forest communities that rely on exposure to fire. Large fuels generally don't contribute to fire spread.
7-489	Public Concern: The Forest Service should adequately address the effects of prescribed burning.	The effects are addressed in Chapter 3 of the EIS. Consultation with FWS has been an integral part of the development of this LMP and EIS. The LMP outlines a programmatic framework to guide the use of prescribed fire in a way that will not effect endangered or threatened species. Ongoing informal consultation with the FWS ensures that no adverse effects will occur.

7-492	Public Concern: The Forest Service should not conduct prescribed burns between May 1 and August 15, where Indiana bats are present	The LMP reflects these dates..
7-494	Public Concern: The Forest Service should not conduct prescribed burns during pine beetle infestation.	Prescribed fire is be used to restore SPB damaged areas. These areas where pine has been killed by SPB infestations. Prescribed fire is being used as a site preparation tool for natural regeneration and artificial regeneration of naturally occurring forested communities.
7-497	Public Concern: The Forest Service should limit the size of prescribed fires to 1,000 acres.	Some of our prescribed burns are less than 1,000 acres. Most of the CNF burns use roads and streams for firebreaks to reduce the amount of fireline that has to be dug or plowed and to minimize resource damage. Burning bigger blocks in most cases reduces the amount of fireline that has to be put in by using roads and streams for natural firebreaks.
7-500	Public Concern: The Forest Service should conduct prescribed growing season burns for pine ecosystems.	Although the CNF is not included in the RCW Recovery Plan, growing season prescribed burns will likely be conducted on an experimental basis during implementation of the LMP, as long as no adverse effects on other listed species are expected to occur.
7-501	Public Concern: The Forest Service should reduce the emphasis on prescribed fire in the Appalachians and conduct site-specific studies on the use of fire.	Fire is an integral part of ecosystem management. Prescribed fire monitoring is currently being conducted and other fire related research has been conducted.
7-504	Public Concern: The Forest Service should cite references to support the increased use of prescribed fire.	See 21.0 Prescribed and Wildland fire in chapter 3 of the EIS.
7-505	Public Concern: The Forest Service should re-evaluate the use of prescribed burns and consider the Quentin Bass studies.	See response for concern 7-184 and 7-487.
7-509	Public Concern: The Forest Service should conduct thinning.	Thinning opportunities are limited on the CNF due to limited access and steep slopes. Thinning is a tool used to maintain healthy forest communities and begin shifting pine plantations to more naturally occurring forested communities.
7-513	Public Concern: The Forest Service should not use prescribed fire in wilderness areas.	Prescribed fire is allowed in wilderness areas to protect the resource value if there is an unnatural buildup of hazardous fuels. See chapter 2 and chapter 3 of the LMP.
7-515	Public Concern: The Forest Service should conduct prescribed burns and allow forest lands to be used for recreation.	Thank you.
7-517	Public Concern: The Forest Service should limit timber harvest to areas where fire may threaten homes and communities.	Timber harvest alone does not reduce risks of damage to homes from wildfire. Following timber harvests, there is usually a buildup of logging debris such as limbs and tops from trees that have been cut. Logging debris will contribute to fuel loading for a period of 5 to 10 years after harvest. In addition, areas where trees have been cut are quickly re-vegetated with herbaceous and woody plants that contribute to fuel loading. Harvests in conjunction with prescribed fire to reduce fuels could be effective in reducing risks associated with wild fire.
7-519	Public Concern: The Forest Service should not use timber harvest and road building for fire prevention.	See response fir 7-517. Only existing roads are used for fire control operations.
7-520	Public Concern: The Forest Service should spend budget funds on the designated forest and not use that money to fight fires elsewhere; firefighting should be funded by Congress.	Thank you for your comment. Funding is provided by the Congress of the United States. The Washington Office of the Forest Service distributes funds to the regions, and the regions to the National Forest. Fiscal integrity is of paramount importance for every administrator in the US Forest Service. Emergency firefighting is not a prerogative for the Forest Service, it is a requirement. When emergency firefighting funds are not available for fire suppression, then other available monies must be used. This only happens during years of extreme fire activity.
7-523	Public Concern: The Forest Service should address the effects of increased wilderness and roadless areas in limiting access to wildland fire management.	This is addressed in the 17.2 wilderness and roadless areas section in chapter 3 of the EIS.
7-526	Public Concern: The Forest Service should select a method of vegetation management other than prescribed fire.	Air quality effects of prescribed fires are minimized through the development of a prescribed fire plan for each area to be burned. Forest personnel consider the relationship between smoke sensitive targets and the atmospheric conditions needed to avoid impacts to people's health or safety from the smoke emitted by a prescribed fire. Ignition will occur only when the predicted atmospheric conditions meet the conditions noted in the prescribed fire plan. The prescribed fire plan contains provisions to mitigate the impacts of smoke, or cease ignition, if meteorological conditions change during implementation.
7-527	Public Concern: The Forest Service should address the climate change effects from the increase in carbon dioxide emissions from large-scale fires.	The effects of carbon dioxide emissions were not discussed in the CNF revised LMP because global climate change is beyond the scope of the analysis. The role of nitrogen oxide emissions on nitrogen deposition and ozone formation are discussed in Appendix I of the revised LMP.
7-528	Public Concern: The Forest Service should moderate the particle emissions potentially caused by prescribed burning of forest vegetation.	See the CNF revised LMP, Appendix I for discussion that some areas of the CNF are anticipated to exceed the fine particle NAAQS. In those areas, management is required to follow the General Conformity rules if the proposed action is considered to be significant contributor of nitrogen oxides or fine particles.
7-534	Public Concern: The Forest Service should actively manage forests for forest health.	Forest health is, indeed, a major theme of the alternative chosen to be the plans for the CNF. Management Prescriptions allocated in the LMP reflect a theme of ecosystem restoration and maintenance, which will, in turn promote the most healthy forest conditions possible. Forest health direction is provided in each prescription where it is compatible with the desired condition.
7-555	Public Concern: The Forest Service should not conduct management activities for forest health.	Management activities are proposed for restoration of naturally occurring vegetative communities that exhibit reliance or resistance from disturbances such as fire, insect and disease attacks, wind, and ice and snow. Many of the vegetative communities found on the CNF have been altered by human activity, such as fire suppression and timber harvesting. With the introduction of many non-native invasive pests like gypsy moth and hemlock woolly adelgid, natural systems are being adversely impacted and in some cases are permanently changed with respect to species composition.
7-555.a	Because forests will thrive if left in a natural state.	See 7-555 above.

7-555.b	Because complex natural cycles cannot be imitated by management actions.	Natural disturbances as well as human caused disturbances have been a part of forest development for thousands of years. Natural disturbances continue in the way of wind, ice, snow, and fire. Human caused disturbances in this revised LMP are proposed to restore naturally occurring forested communities.
7-539	Public Concern: The Forest Service should outline precise provisions to maintain forest health.	It is difficult to provide "precise" provisions for a wide array forest health issues, however, desired conditions, goals, objectives, and standards have been developed and are in Chapter 2 of the revised LMP in the "Vegetation and Forest Health" section, and in Chapter 3 of the LMP for each Management Prescription.
7-542	Public Concern: The Forest Service should not conduct timber harvest or prescribed burns in Southern Appalachian forests.	See response for concern 7-487.
7-542.d	Because the Southern Appalachians are one of the most biologically diverse regions outside of the tropics	See response for concern 7-487.
7-545	Public Concern: The Forest Service should manage forests for a balanced age class distribution.	Even distribution of age classes is emphasized as an objective in alternative D.
7-545.a	Because unmanaged forests lead to destructive fires	See response for concern 7-517.
7-546	Public Concern: The Forest Service should emphasize disturbance management on stands in intermediate to xeric conditions along the moisture gradient.	The objective in Chapter 2 for creating and maintaining early successional habitats in areas above 3000 feet in elevation is 1000 acres.
7-548	Public Concern: The Forest Service should recognize that forest management activities can be implemented with no significant deterioration of water quality.	The effects section in Chapter 3 of the EIS describes potential impacts that can occur to water quality from forest management practices. There is specific acknowledgement, however, that water quality effects can be greatly reduced by the proper use of best management practices and the management standards contained in the LMP.
7-556	Public Concern: The Forest Service should allow salvage timber harvest.	The selected alternative for the CNF revised LMP contains goals and objectives that will be accomplished by the activity of timber harvesting, and this includes salvage timber harvesting where compatible with those goals and objectives.
7-556.b	To provide Economic Benefits.	Guidance for salvage harvesting is found in the "Vegetation and Forest Health" and "Terrestrial Wildlife and Threatened, Endangered, and Sensitive Species Habitat" sections of Chapter 2, and under RX2.B.3 and RX12.B in Chapter 3 of the revised LMP.
7-561	Public Concern: The Forest Service should ensure the timely removal of beetle killed timber.	Southern pine beetle damage has had a major impact on southern yellow pine and white pine communities on the CNF over the last 4 years. Quick response to bark beetle attacks is critical for suppression of infestations and for salvage of a valuable resource. The CNF was not able to react in a timely manner and lost a large number of acres to SPB. In many cases the damaged areas were pure Virginia pine stands. These areas are a high priority for restoration to forested communities that occur naturally such as mixed stands of upland hardwood-shortleaf pine-pitch pine. Prescribed fire will play a major role in establishing and maintaining these communities. See objectives in Chapter 2 of the revised LMP for detailed information restoration of these communities and maintenance of open woodlands, savannas, and grasslands.
7-566	Public Concern: The Forest Service should analyze both the effects of insects and disease and the effects of suppression activities.	Insect and disease infestations projections were not included in the growth and yield estimates because of the uncertainty with which to make projections in the long-run over what those level of infestations might be. Insect and disease simulators are available, but are determined to be useful for only a 10-20 year projection. The growth and yield estimates used in the SPECTRUM analysis used projections over 100 and sometimes 200 years. Therefore, it was decided to address this in a narrative fashion and explain in the EIS that the volumes do not include the effects from insects and diseases, so the actual volumes removed will likely be less than projected; and to include a description of what the effects from insect and disease infestations will likely be in the near future. These descriptions can be found in the EIS in Chapter 3 of the EIS in section 16.0, Forest Health.
7-572	Public Concern: The Forest Service should coordinate with the U.S. Fish and Wildlife Service and develop detailed plans to control pest species.	Several LMP objectives (18.03, 18.04) and standards address approaches to managing insect infestations, including use of Integrated Pest Management, suppression, eradication, and slow the spread strategies. Level of consultation with FWS will depend on the project-level proposed action and the presence/absence of rare species.
7-578	Public Concern: The Forest Service should create areas of savannah/grassland habitat in areas of extensive beetle kill.	Same as comment 7-561 above.
7-579	Public Concern: The Forest Service should prevent the spread of exotic plants.	There is no specific goal regarding the spread of exotic plants through road building and timber harvest activities in the LMP because this is taken care of through the use of specific provisions that are included within the timber sale contract. A specific clause is added to the contract that specifies equipment must be free of weed propagules before entering the CNF.
7-581	Public Concern: The Forest Service should protect forests from invasive, nonnative species; pests; and oak decline.	Integrated Pest Management practices is be used to suppress populations of exotic pests.
7-583	Public Concern: The Forest Service should prevent exotic plants from spreading.	Exotic plants are discussed in Chapter 2 of the revised LMP under the heading of Vegetation and Forest Health. Here, management of exotic plants are discussed in the Background section.
7-589	Public Concern: The Forest Service should work on strategies to eliminate invasive species that have been planted in wildlife openings such as autumn olive.	See Forest Wide Goals, Objectives, and standards in Chapter 2 of the revised LMP under Terrestrial Wildlife and Threatened, Endangered, Sensitive Species Habitat section. The EIS includes discussion of general programmatic effects of LMP on this issue throughout chapter 3. Much of the direction on invasive plants is covered under the regional Noxious Weed Management Strategy, which will be followed during plan implementation. This strategy includes a list of invasive non-native species and guidelines for their use.
7-597	Public Concern: The Forest Service should provide details in the EIS about the proposed use of herbicides, or remove quantitative predictions.	Particular herbicides, rates of application, and methods of applications are analyzed in detail on a site specific basis and documented in an Environmental Assessment for the project. It is difficult to name herbicides to be used over the life of the plan since changes in materials, application methods, and rates could occur during this time.
7-601	Public Concern: The Forest Service should use herbicides to achieve specific objectives.	Standards for the use of herbicides have been established in the revised LMP. See Forestwide standards in Chapter 2 under the Vegetation and Forest Health section. The quantitative prediction referred to has been removed.

7-654	Public Concern: The Forest Service should provide an adequate buffer along the TVA power line within the proposed Big Laurel Branch extension.	Correction to the allocation and mapping has been made.
7-682	Public Concern: The Forest Service should specify provisions regarding the placement of communication towers and windmills, and conduct research on migratory bird interactions with cell towers and wind turbines.	<p>This is addressed to some degree by requiring design of new towers to mitigate collision impacts to migratory birds (see FW standards 133,134 and 135).</p> <p>The Forest Service is required by NEPA to evaluate the effects of proposed tower sitings and/or impacts on migratory birds in coordination with the F&WS. The F&WS has been charged with regulation of migratory species in the Migratory Bird Treaty Act (16 U.S.C. 703-712).</p> <p>A Communication Tower Working Group lead by the F&WS, composed of government agencies, industry, and academic researchers was formed to develop and implement a research protocol to determine the best ways to construct and operate towers to prevent bird strikes. From this working group, voluntary guidelines were established. These guidelines are to be used in conjunction with Federal Aviation Administration requirements and local community concerns where necessary.</p> <p>In addition, the F&WS is required by the Endangered Species Act to assist other federal agencies, such as the Forest Service, in ensuring that any action they authorize thru concurrence of NEPA will not jeopardize the continued existence of any federally endangered or threatened species.</p>
7-684	Public Concern: The Forest Service should avoid constructing new communication towers and should follow the height and type recommendations offered by the U.S. Fish and Wildlife Service if it is determined that a new tower is necessary.	See response to concern 7-682.
8-1	Public Concern: The Forest Service should preserve National Forest System lands.	The LMP addresses 12 common issues that include the wide range of desires, wants, needs, and concerns that have been expressed by the users of the CNF. Often times, meeting one set of needs/concerns is in conflict with meeting other needs/concerns. The challenge is to try to find the appropriate level of management that will best address all these issues. The Record of Decision explains how the Selected Alternative is the alternative that does the best job of trying to meet the public's demands while protecting the resources.
8-5	Public Concern: The Forest Service should dedicate more effort and funds to detect, track, and enforce violations.	The CNF is aware of violations and is making efforts to prevent them.
8-8	Public Concern: The Forest Service should consider the urban sprawl surrounding National Forest System lands.	The revised LMP comprises a variety of prescriptions allocated across the CNF that responds to public issues, management concerns and resource development opportunities (see Chapter 1 of the revised LMP for a listing of the issues). The allocation provides for many recreational uses, restoration of habitats, and protection of natural resources, in addition to allowing for extraction of renewable and some non-renewable resources..
8-10	The Forest Service should not sacrifice the long-term well-being of local economies for profits generated through stand-clearing timber management. .	<p>The use of the "clearcutting" method of regenerating forests is displayed in Appendix H of the revised LMP. The annual amount, limited to Virginia pine, is 338 acres. This limited amount of clearcutting is proposed for prescription areas with scenic objectives that are compatible with timber management activities and not incompatible with tourism.</p> <p>Certainly, economic effects, in addition to environmental effects, was part of the analysis disclosure for the EIS. The decision to select Alternative I, over other alternatives, was made with environmental and economic factors in mind.</p>
8-17	Public Concern: The Forest Service should emphasize production of goods and services beneficial to local economies and communities.	The impacts on forests local economies of all alternatives considered are found in Chapter 3 of the DEIS (pages 420-423). The last table in this series of tables is particularly relevant in that it shows the relative share of the Forest Service's programs and expenditures and their effect on the local economy. In both instances the overall effect on the local economies in terms of employment and total income is very small. The CNF chose an alternative that is responsive to the demands on the resources of the national forest.
8-19	Public Concern: The Forest Service should better explain the use of the IMPLAN model and the employment and income impacts of the separate alternatives.	<p>Regional economics models dealing with input-output analysis are very complex. Their use involves a number of assumptions and judgment factors that may make the findings by two different analysts somewhat different. The IMPLAN model takes a considerable amount of time to learn and to become proficient. Forest Service users have invested considerable amounts of time in training in model building. Therefore, replication and validation by another source may not be likely for a novice user. Important assumptions have been documented in the FEAST spreadsheet which is part of the Process Records. Data sources have been described in Appendix B of the EIS.</p> <p>Appendix B gives a general overview of how the impact results were generated for each resource or activity on the CNF. Because it is not expected that someone who is unfamiliar with IMPLAN could readily perform input-output analysis, a detailed explanation of every step in building the model and constructing individual resource and activity impact files was not made a part of Appendix B. If the commenter wants to know the procedural process for running IMPLAN, refer to "IMPLAN Professional User's, Analysis Guide and Data Guide", Minnesota IMPLAN Group, Inc., 1997, which is part of the Process Records. The Minnesota IMPLAN Group also offers training classes for model usage.</p> <p>The various Forest Service resources and activities are discussed in the "Economic and Local Government Impact Analyses" section of Appendix B of the EIS. Resource and budget impacts from the IMPLAN model and FEAST spreadsheet are presented and discussed in section 24.2.2 of Chapter 3 of the EIS. This is an adequate description.</p>
8-21	Public Concern: The Forest Service should identify and consider economic issues and impacts.	The EIS analysis of the economics of the forest analysis area was constructed to comply with 36 CFR 219.12 and the Forest Service Manual and Handbooks, FSM 1970 and FSH 1909.17, respectively. These directives suggest that the CNF conduct an impact analysis showing expected jobs and income associated with the consumption of resources and expenditures from a forest (an equity analysis that shows how a dollar of expected demand for a resource is divided among the various sectors of an economy). The impact tables presented in Chapter 3 of the EIS satisfies this requirement. Secondly, the directives provide for a present net valuation (an efficiency analysis to show how well expected revenues cover expected costs) of the resource

		<p>programs showing a discounted value for the estimates of benefits and the costs for conducting these programs over the planning horizon. The present net value tables are likewise shown in Chapter 3 of the EIS.</p> <p>Any economic issues that develop in our dialog with the public will also be addressed. For these forests no additional issues specific to a given forest were raised from the public.</p> <p>The EIS presents a mix of goods and service outputs from its SPECTRUM model which has been fully documented in Appendix B.</p> <p>Output valuations are given in economic tables of Appendix B. These tables have been revised to better reflect the sources of the valuations.</p> <p>Demand-Supply analyses are presented as part of the "Analysis of the Management Situation (AMS) [Forests: Paul would like a summary of your resource supply-demand analyses place in Appendix B of the FEIS], which is not automatically made part of the EIS. Attention to the supply and demand for Wildlife is a part of the AMS and should be found in the forests' "Process Records".</p> <p>Because of the vast uncertainty of prices and inflation in future years, most prices used in these forests analyses were in constant 2000 prices. When estimates of real price increases were available for historical data before 2000, real price adjustments were made to year 2000. Future prices were not increased. This is theoretically acceptable when a present net value analysis is discounted in real terms as was done in this analysis.</p> <p>Timber and some recreation impacts in these analyses are qualified with the term that the resulting jobs are "associated" with the resource consumption rather than the jobs are caused by the consumption because there may be other landowners who would satisfy local timber demand if the Forest Service did not offer timber for sale; or local Forest Service recreation users may spend their recreation dollars on other non-wild-land recreation events if they did not visit a local forest. Therefore, impacts would be similar for both these resources even if they were not consumed on national forest lands. Impact estimates are given to show the decision maker the relative importance of the CNF's resource consumption in the local community and have no other purpose, as you seem to intimate with your comment that a "social efficient" policy would be to log no government timber.</p> <p>All resources whether valued or not are considered in "maximizing net public benefits" to the public. The decision maker has a quantification of those resources that can be priced whether market based or non-market based of an assigned value. The "weight" of resources is the result of SPECTRUM analyses. Some non-market, non-priced resources such as visual or water quality may be a subjective factor in the maximization of net public benefits. Ultimately, the choice of the preferred alternative is up to that the forest and the Regional Forester. When the Record of Decision is released, the rationale for choosing a given alternative will be addressed.</p> <p>The efficiency analysis requirements explained in FSH 1909.17 combines market and non-market resources. The Forest Service defines and economic efficiency analysis as containing these two components. A financial analysis required for project timber sales is solely a market commodity resource analysis.</p> <p>The various expected effects of the CNF programs are presented in Chapter 3 of the EIS. Where adverse circumstances are found, mitigation measures are discussed. The expenses for these measures are incorporated into the program expense which is accounted for in the CNF budget. The CNF has accounted for what is expected for an economic analysis that is explained in the FS Handbook.</p>
<p>8-22</p>	<p>Public Concern: The Forest Service should better determine the combination of forest resources that will maximize net public benefit.</p>	<p>One of the contentions in this comment is that the EIS failed to include all benefits and costs in the economic efficiency analysis for the understanding of the maximization on net public benefits. Because these items were omitted the Forest Service had not complied with the guidelines of 36 CFR 219.</p> <p>The Forest Service does not use its socio-economic analysis quantified measures and indexes as the sole means of displaying alternative outputs (FSM 1970.8(5)). Such a value is one piece of information for the decision maker to use in making selections among alternatives. Other resources that are impacted are discussed qualitatively. Their consequences in forest management are decided along with the monetized resource in arriving at an alternative that maximizes net public benefits. After reviewing the planning documentation and comments from the public participation, the determination of the best alternative which maximizes public net benefits is left to the judgment of the decision maker. Rationale for the selected alternative is given in the Record of Decision.</p> <p>The CNF uses the best available data for the analysis and decision making. CISC is the source of timber stand data used in the analysis. CISC is a non-spatial database, and must be linked to a GIS to have spatial characteristics. CISC data was added to the GIS for planning purposes. While CISC is the source of the data, the data resides in a GIS table.</p> <p>The EIS analysis of the economics of the forest analysis area was constructed to comply with 36 CFR 219.12 and the Forest Service Manual and Handbooks FSH 1909.17 and FSM 1970, respectively. These directives suggest that the Forest conduct an impact analysis showing expected jobs and income associated with the consumption of resources and expenditures from a forest (an equity analysis of how a dollar of expected demand for a resource is divided among the various sectors of an economy). The impact tables presented in Chapter 3 of the EIS satisfies this requirement.</p> <p>The "weight" of resources is the result of SPECTRUM analyses. Some non-market, non-priced resources such as visual or water quality may be a subjective factor in the maximization of net public benefits. Ultimately, the choice of the preferred alternative is up to the Regional Forester. When the Record of Decision is released, the rationale for choosing a given alternative will be</p>

		<p>addressed.</p> <p>The efficiency analysis requirements explained in FSH 1909.17 combines market and non-market resources. The Forest Service defines and economic efficiency analysis as containing these two components. A financial analysis required for project timber sale is solely a market commodity resource analysis.</p> <p>Many of the “ecosystem services” provided by forested land, such as flood control, purification of water, recycling of nutrients and wastes, production of soils, carbon sequestering, pollination, and natural control of pests; and externalized costs of resource extraction, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource use and development, are considered to be effects remote from resource management on the Jefferson NF. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219.</p> <p>Contrary to what the commenter claims, logging does not necessarily cause most ecosystem services to be significantly diminished or entirely eliminated. Logging is only conducted on a portion of all national forest lands, and the interval between repeat entries onto the same area is often measured in decades. When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption of services is only temporary. Finally, it is important to recognize that some ecosystem services – e.g., wildlife habitat – may actually benefit from logging. This last point is indicative of a larger problem. The commenter focuses exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.</p> <p>U.S. Forest Service activities on the forest are governed by a large number of rules and regulations designed to mitigate negative impacts or otherwise protect forest resources. In the planning process these benefits associated with regulations are seldom quantified in dollar terms. The costs for achieving these benefits are in the form of increased operating costs and reduced timber revenues.</p> <p>Therefore, it is the U.S. Forest Service’s policy to fully enumerate the dollar values of all market and non-market benefits and costs in the planning process that can reasonably be expected to occur in an attempt to provide as much relevant information as possible to aid in making good planning decisions.</p> <p>TSPIRS was a report of timber revenues and costs of a fiscal year of timber activity. This report is no longer required. The Forest has access to Cut and Sold reports to analyze the costs and revenues of its Timber program.</p> <p>Another issue under this comment is that public and non-public timber is not a perfect substitute because the public prefers environmental values to commodity production and therefore there is a cost to the public of “timbering” on NFS lands that does not occur on private lands, and the net benefits from timber production are overstated in the present net value analysis: Contrary to what the commenter claims, logging does not necessarily cause most environmental values to be significantly diminished or entirely eliminated. Logging is only conducted on a portion of all national forest lands, and the interval between repeat entries onto the same area is often measured in decades. When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption of services is only temporary. Finally, it is important to recognize that some environmental values – e.g., wildlife habitat – may actually benefit from logging. This last point is indicative of a larger problem. The commenter focuses exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.</p>
8-23	Public Concern: The Forest Service should use mathematical modeling techniques to identify the most economically efficient solution to meet the goals and objectives of any alternative.	This involves responding to a number of questions specific to the SPECTRUM model:
8-23a	Question - Where were the resource dollar values obtained? Please provide references. Why were these values deemed appropriate for the Forest? Do the values represent measures of consumer willingness-to-pay? If not, why not?	See the table presenting the Economic Benefits and Financial Revenue Values of the EIS. The values presented in this table represent market values for Timber and Minerals and assigned values from benefit transfer studies of willingness to pay used by NFS Research for Recreation and Wildlife.
8-23b	Question - Where was the resource physical output units used for the cost benefit analysis obtained? We can find no reference to them in the DEIS, appendices or draft plan.	The timber product estimates were taken from the SPECTRUM model and the recreation/wildlife/fish estimates were derived from NVUM (National Visitor Use Monitoring) results. The full procedure for estimating the recreation/wildlife/fish estimates can be found in the process records.
8-23c	Question - Did the cost benefit analysis include the amount and value of the environmental impacts (e.g. the value of social losses) due to forest harvesting? If not, please provide an explanation for this oversight.	<p>The CNF presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). The CNF discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods, the CNF chose to discuss them in a narrative fashion as part of the assessment of net public benefits. Such an economic efficiency analysis is prescribed in the Forest Service Handbook FSH 1009.17, Chapter 10. The discussion of how the selected alternative maximizes net public benefits can be found in the Record of Decision.</p> <p>Many of the “ecosystem services” or “social losses” that you refer to are considered to be effects remote from resource management of these forests. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219. Resource effects on other resources are discussed in Chapter 3 of the EIS.</p>
8-23d	Question - Why was a 4% discount rate used when everything is in real terms? The rate probably should be closer to 2%.	Agency policy makes provision for using a 4 percent real discount rate for long term resource program analyses in the FSH

		1909.17, 15.42
8-23e	Question - Why wasn't a more recent price for an RVD used? How does this value compare to travel cost and contingent valuation study values?	The most recent information available at the time of the analysis are prices expressed in 1989 dollars and estimated from 1989 to 2040, which are found in the FS publication "Resource Pricing and Valuation Procedures for the Recommended 1990 RPA Program". The CNF estimated the real price growth to year 2000 and adjusted the values to reflect 2000 prices. Forest Service non-market valuations for forest planning are provided by Forest Service Research and Forest Service Strategic Planning and Resource Assessment in the Washington Office, and they are working on updating these values, but that information is not yet available. The values used are found in Appendix B in the table presenting the Economic Benefits and Financial Revenue Values of the EIS
8-23f	Question - Are recreation and wildlife/fish really a constant throughout all alternatives? This seems very odd, particularly given that the nature of these experiences will vary substantially between alternatives. Disaggregation of visitor days/expenditures by recreation type, and disaggregation of visitor days by recreation type for each alternative appears called for. This type of analysis certainly isn't visible in the employment and labor income tables.	The recreation and wildlife/fish estimates are not constant by alternative. A disaggregation of visitor days by recreation type was developed. This was needed to determine the present net value of the alternatives and the economic impact of the alternatives since different recreation activities have different values, and different recreation activities have different expenditures in the local economy. These estimates can be found in the process records.
8-23g	Question - Without disaggregated data one cannot infer changes in size either of outflows or inflows from changes in the net flow. Just because tourism is a larger net importer in 1996 than 1985 does not imply that "travelers were not coming into the analysis area at a greater rate in 1996 than 1985." More could be coming in (more exports), but were swamped by a greater increase in imports, making the net imports larger. Overall there seems to be confusion between demand and supply in the analysis. Just because recreation facilities are developed doesn't mean they will be used. Nor does current usage imply that there might not be a supply constraint so that actual demand exceeds current usage.	The comment is apparently referring to tables B-139 in the CNF DEIS appendix B. The CNF 1996 shows tourism to be a net exporter of dollars to the local economy over 1985 (that is, more people are coming into the local analysis area to recreate and visit than are going outside the area). Your statement of more tourists coming into the analysis area (exports), being swamped by a greater increase in imports (people and dollars leaving the area) making net imports larger is not the case for the CNF. It is uncertain what you are referring to by stating the need for "disaggregated data" to infer how trade flows are occurring. The trade flows are simply estimates of industry shares that comprise tourism. Table B-139 shows the disaggregated industry make-up of tourism. The analysis is sufficient. There is some uncertainty as to what part of the DEIS the commenter is referring to concerning supply-demand. The CNF has performed a supply and demand of their recreation resource and has determined that they have the ability to supply expected demand and have determined there will be no supply constraints during the analysis period. [Forests – Check to see if this last statement is correct. This is really a Recreation comment to assess how they believe they will be able to accommodate recreation use in the future.]
8-23h	Question - The DEIS states, "For each decade, an average annual resource value was estimated, multiplied by 10 years, and discounted from the mid-point of each decade." The Forest uses 2000 timber and resource prices, and all values are stated in 2000 prices. Are estimated changes in real prices over time accounted for? Are effects of technology accounted for? Is income growth accounted for?	All resources were assumed to be priced in 2000 constant dollars in order to be conservative with the analysis, hence technology and income growth are not accounted for in price estimations. Having a conservative Present Net Value analysis that is still positive indicates a good certainty in your program objectives of achieving the Forest Service hurdle rate of 4 percent. Predicting income growth and technology changes for the Forest Service planning horizon (50 years) would be pure speculation
8-23i	Question - There is a reasonably good discussion of prices used (except for timber), but too little discussion of the assumptions in the analysis and the issues raised by it. For instance, trends in real prices should be taken into account. There is every reason to believe that the value of various natural experiences will rise over time as population and income rise while less and less natural areas are available to the public either through development or posting. This should be accounted for. Water production increasingly is an issue in the southeast as clean water becomes relatively scarcer. That price per unit should be rising in real terms also.	Because of the vast uncertainty of prices and inflation in future years, most prices used in the CNF analysis were in constant 2000 prices. When estimates of real price increases were available for historical data before 2000, real price adjustments were made to year 2000. Future prices were not increased. This is theoretically acceptable when a present net value analysis is discounted in real terms as was done in this analysis. Forest Service planning horizons are 50 years. Trying to estimate expected real price increase over this time period is pure speculation. A more conservative method is to use constant 2000 prices and costs to see if expected program benefits will satisfactorily cover expected program costs.
8-23j	Question - Note that, since timber is coming off of NF land, where the public prefers environmental values to commodity production (see above), there is a cost to the public of timbering on NF lands that does not exist when the timbering occurs on private lands. I.e., NF timbering and NIPF timbering are not perfect substitutes from a public perspective. As a result, net benefits from timber production are overstated in the present net value of the alternatives. What about non-consumptive values, such as existence and option values (the willingness of the public to pay for knowing that something exists, even though they never intend to see or use it, and the willingness to pay to have the option of sometime using the resource)? Response –	The U.S. Forest Service's does not attempt to fully enumerate the dollar values of all non-market, non-priced benefits and costs in the planning process that may be of a speculative nature. The agency does, however, attempt to provide as much relevant information as possible to aid in making good planning decisions, and this information may sometimes take the form of monetary estimates of non-commodity values as presented in the Present Net Value tables. U.S. Forest Service activities on the forest are governed by a large number of rules and regulations designed to mitigate negative impacts or otherwise protect forest resources. In the planning process these benefits associated with regulations are seldom quantified in dollar terms. The costs for achieving these benefits are in the form of increased operating costs and reduced timber revenues. 36 CFR 219.12(g)(1) instructs forest plan development by requiring an analysis of expected outputs during various planning periods. It suggests use of outputs which include marketable goods and services as well as non-market items, such as recreation and wilderness use, and wildlife and fish. These are the resources the forests' DEIS has undertaken to show a present net value as required by 36 CFR 219. All the southern Appalachian forests have presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). These forests have discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods and have a significant part in the selected alternative, we will discuss them in a narrative fashion in the Record of Decision as part of the consideration for maximizing net public benefits. Many of the "environmental values" that you allude to that are provided by forested land, such as flood control, purification of water, recycling of nutrients and wastes, production of soils, carbon sequestering, pollination, and natural control of pests; and externalized costs of resource extraction, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORVs and other dangers related to intensive resource use and development, are considered to be either effects remote from resource management or mitigation measures have been discussed in Chapter 3 of the DEIS to prevent many adverse consequences of logging on these forests. For those items we consider

		<p>speculative and unforeseen, their consideration in the efficiency analysis required by 36 CFR 219 is not warranted.</p> <p>Option values and existence values are not items required to be discussed under 36 CFR 219. These are highly controversial methodologies which can be of a contentious nature with many publics. The Forest Service has chosen not to use values based on questionable and controversial methodologies and values not specifically required by Forest Service directives.</p> <p>The consequences of the forests' programs on the water and wildlife resources are discussed in Chapter 3 of the EIS. These discussions have offered mitigation measures where the resource may be affected by the timber program. Therefore, adverse effects are believed to be minimal.</p>
8-23k	Question - Finally, the analysis fails to discuss the weights placed on non-priced goods and services produced by the Forest and, as such, fails to inform the reader how Alternative I came to be the preferred alternative. Please provide an explanation as to how this was determined.	The rationale for the selected alternative is documented in the Record of Decision. This rationale explains how the selected alternative maximizes "net public benefits" which is not to be confused with "present net value". "Net public benefits" includes considering those "benefits" and "costs" that cannot be quantified.
8-24	Public Concern: The Forest Service should clarify the meaning of the SPECTRUM linear programming solution.	See response to 7-311.
8-25	Public Concern: The Forest Service should conduct an economic analysis within a timeframe appropriate to the resources being managed.	<p>The CNF has complied with what is expected for an economic analysis under 36 CFR 219.12. 36 CFR 219.12(g)(1) instructs forest plan development by requiring an analysis of expected outputs during the planning period. It suggests use of outputs which include marketable goods and services as well as non-market items, such as recreation and wilderness use, wildlife and fish, protection and enhancement of soil, water, and air, and preservation of aesthetic and cultural resource values. These are the resources the forest EIS has undertaken to show a present net value as required by 36 CFR 219.</p> <p>The CNF has presented a present net value of resources which are suggested in 36 CFR 219.12(g)(1). The forest has discussed only foreseen consequences of our land management alternatives on the environment in a narrative fashion. For those resources that can be reasonably valued via market data (e.g. timber, minerals, range) and for those non-market resources that have Forest Service estimated values from Forest Service Research, we have presented values in the present net value calculation. For resources that have no values estimated by generally accepted methods, we have chosen to discuss them in a narrative fashion as part of the assessment of net public benefits.</p> <p>Costs provided in these estimates are expected program costs to implement the program including timber sale administration and costs for mitigation and roads.</p> <p>An additional comment refers to the costs and benefits of the Timber Program under 36 CFR 219.14 where lands suited for timber harvest are identified. Historical average costs (including reforestation, timber stand improvement, roads, release, and harvest administration) and expected timber revenues expressed in 2000 dollars are entered into the SPECTRUM model to assess the efficiency of lands of the Forest. The results of this modeling are areas ranked by present net value.</p> <p>We have satisfied 40 CFR 1502.23 by our effects analysis under the various resource categories of Chapter 3 of the EIS. The CNF attempts to choose an alternative that will maximize net public benefits. This decision comes all alternatives have been assessed in a present net value manner for resources that can be quantified, and after those resources of a non-quantifiable nature have been discussed in a narrative fashion as to how they contribute to net public benefits.</p>
8-28	Public Concern: The Forest Service should further develop an analysis of average annual cash flows and non-cash benefits.	Table 03 of 1909.12, 4.13 has not been included in the DEIS. A similar table is part of the Process Records, showing undiscounted as well as discounted decade costs and revenues by alternative and by program.
8-30	Public Concern: The Forest Service should include an analysis of externalities in the DEIS.	<p>The expected physical effects of resource program implementation of the CNF are discussed in Chapter 3 of the EIS. Where adverse effects may occur, mitigation measures are prescribed to ameliorate those possibilities.</p> <p>Your contention that timber harvests develop costs that occur to the environment ("externalities") such as:</p> <p>Costs take the form of lost jobs and lost revenues to businesses such as those engaged in wilderness recreation outfitting or the gathering of non-timber forest products.</p> <p>Costs that take the form of increased expenditures for environmental quality. For instance, when water quality is degraded, municipalities, businesses, and residents downstream are forced to incur higher costs of filtering water.</p> <p>Extractive activities on national forests create additional costs, as well, such as increased rates of death, injury and property damage resulting from accidents involving heavy equipment, log trucks, ORV's and other dangers related to intensive resource use and development. Such uses also contribute to increased fire risk on national forests, not only due to adverse changes in vegetation structure and composition, but due to increased human access.</p> <p>Many of the "externalized" costs that you enumerate are considered to be effects remote from resource management on the CNF. Their speculative and unforeseen nature does not warrant a consideration in the efficiency analysis required by 36 CFR 219.</p> <p>When logging is undertaken, it is conducted in accordance with forest plan standards and guidelines designed to protect other resource values. Logged areas are regenerated to a new forest, so any disruption is only temporary. The commenter focuses exclusively on the potential negative effects of logging; they ignore the fact that national forest logging can have external benefits as well as costs.</p> <p>The CNF has analyzed the expected costs and benefits of its resource programs in accordance with 36 CFR 219.12.</p>
8-31	Public Concern: The Forest Service should develop quantified monetary values for ecosystem services and incorporate these values into the DEIS.	See response to concern 8-23.
EP-1	Public Concern: The Forest Service should provide sufficient information in the DIES to allow the Environmental Protection	The EIS is complete. It provides a purpose and need for action, a proposed action, alternatives to the proposed action that

	Agency to assess the impacts of the preferred alternative.	address the purpose and need, comparison of alternatives and disclosure of the environmental impacts. In addition, the public has had ample opportunity for involvement, review and involvement.
EP-2	Public Concern: The Forest Service should more effectively avoid or mitigate potential environmental impacts.	NEPA does not require that all impacts be avoided or mitigated. The twin aims of NEPA are to consider alternatives to the proposed action and inform the public of the estimated effects of the alternatives and decision. The EIS adequately describes the entire NEPA process for developing the CNF revised LMP. The range of alternatives discussed in Chapter 2, along with the comparison of alternatives in Chapter 3 is the result of nine years of working openly to meet the requirements set forth in NEPA and NFMA. Public involvement is summarized in Appendix A of the EIS.
EP-3	Public Concern: The Forest Service should acknowledge that the preferred alternative appears to strike a balance between various multiple use activities.	The CNF chooses Alternative I because it best responds to the issues developed during the scoping process. See the ROD for specific reasons Alternative I is the selected alternative.
EP-4	Public Concern: The Forest Service should place greater emphasis on ecosystem restoration/enhancement, watershed protection, and recreation.	The ROD discloses the reason that Alternative I is the selected alternative. The alternatives considered in the EIS range from "minimal human intervention" theme to a high commodity production theme. Restoration is a theme mentioned in Alternatives A, B, G and I. Watershed protection and maintenance of water quality is emphasized in all alternatives, however, Alternative F, the no action alternative continues the watershed protection currently provided. All other alternatives use a more extensive riparian prescription for water quality protection. Recreation either remote, roadless, motorized or developed, is emphasized in all alternatives.
EP-6	Public Concern: The Forest Service should provide specific management strategies and measures to protect and restore watersheds and aquatic habitats.	The watershed condition ranks are based on the existing condition of the entire 5th level watersheds. Many of these watersheds contain very little national forest. Management direction is contained in the LMP to protect and, where necessary and possible, restore watershed and riparian condition. Forest-wide and Prescription 11 management objectives and standards are specifically designed and directed to accomplish this on national forest ownership. Objective 1.01, 1.02 and 1.04 provide direction to work collaboratively with private landowners and other federal, state and local agencies to address mutual watershed concerns at a broader level of analysis.
EP-7	Public Concern: The Forest Service should include additional standards, goals, and objectives for watershed management as recommended by the Environmental Protection Agency.	Existing objectives (1.01 and 1.02) have been revised to address some aspects of this comment. An additional objective (1.04) has also been added.
EP-8	Public Concern: The Forest Service should re-examine specific management prescriptions and redesignate certain specific areas for Watershed Restoration.	These lands are allocated to prescriptions that in tandem with forest-wide standards and the riparian prescription will protect water quality and aquatic habitat on national forest lands. Even though a 9.A.3 prescription may seem suitable for the impaired watersheds as a whole, the condition of NFS lands within these watersheds do not meet the intent and purpose of the 9.A.3 allocation. Other allocations better meet the overall objectives for these lands, especially considering the watershed, riparian and aquatic protection that will be afforded with forest-wide and riparian standards. Any other site specific protection deemed necessary will be considered during project development. Within these watersheds there will be an emphasis on collaboration and coordination with other federal, state and local agencies and private landowners to prioritize watershed improvements, impairment issues and TMDL development.
EP-10	Public Concern: The Forest Service should redesignate certain areas of the Consauga River watershed for Watershed Restoration.	The Conasauga River watershed is allocated to prescriptions that in tandem with forest-wide standards and the riparian prescription will protect water quality and aquatic habitat on national forest lands. Conditions of CNF lands within this watershed do not meet the intent and purpose of the 9.A.3 allocation. Other allocations (2.B.2 and 8C) better meet the overall objectives for these lands, especially considering the watershed, riparian and aquatic protection that will be afforded with forest-wide and riparian standards. Any other site specific protection deemed necessary will be considered during project development. Within this watershed there has been and will continue to be an emphasis on collaboration and coordination with other federal, state and local agencies and private landowners to prioritize watershed improvements and achieve ecosystem restoration needs.
EP-11	Public Concern: The Forest Service should provide a table that includes actual acreages of Forest Service System lands contained in each of the 5th level HUCs.	A table has been added to provide the requested information.
EP-12	Public Concern: The Forest Service should include additional standards for ephemeral streams as recommended by the Environmental Protection Agency.	Minimizing disturbance within a 25 foot wide streamside management zone along both sides of scoured ephemeral streams will provide water quality protection. The 15 to 20 basal area leave requirement does not include smaller understory trees and shrubs that would also provide shade and reduce raindrop impact.
EP-13	Public Concern: The Forest Service should explain the relationship between FW-3 standard and the riparian prescription	Information has been added to the Riparian Corridor Prescription (Prescription 11) write-up that will hopefully better establish the relationship between forest-wide direction and the riparian corridor prescription.
EP-14	Public Concern: The Forest Service should include a discussion of what additional protections are afforded by riparian corridors as opposed to Streamside Management Zones (SMZs).	There is riparian corridor established along perennial and intermittent streams, lakes, wetlands etc. as described in the Prescription 11. Streamside filter zones will be established along perennial, intermittent and ephemeral streams as described in the forest-wide direction contained in Chapter 2 of the LMP. Any best management practices prescribed by the state will also be met. Additional information has been added to the Prescription 11 write-up in an attempt to clarify this.
EP-15	Public Concern: The Forest Service should set minimum riparian corridor widths.	Riparian corridors are one component of the streamside management zone proposed in the LMP. Slope-related streamside filter zones will also be established along perennial, intermittent and ephemeral streams as displayed in the forest-wide direction contained in Chapter 2 of the LMP and described in the Prescription 11 write-up. Riparian corridors will be used along perennial and intermittent streams, and lakes, wetlands etc. as described in the Prescription 11. The default widths would normally be used. Site specific analysis could modify the default widths (expand or contract), however, if project-specific adjustment is necessary to protect or restore values associated with riparian areas. Any best management practices prescribed by the state will also be met.
EP-17	Public Concern: The Forest Service should coordinate with the State to update its list of impaired waterbodies in order to	The most recent listing of impaired waters bodies is available on TDEC's website and has been obtained. The CNF will

	develop appropriate land management prescriptions.	coordinate with TDEC and other agencies in the development of TMDLs. Land management prescriptions allocated within the watersheds of impaired rivers such as the Ocoee, French Broad and Nolichucky (for example) are designed to meet the multiple goals and objectives of national forest management. Water quality protection and enhancement is an emphasis in these watersheds and will be achieved with the prescription allocations made in the LMP along with other management direction.
EP-18	Public Concern: The Forest Service should include in its tables a list of specific impaired waterbodies.	Many of the impaired streams referred to contain very little or no national forest ownership within their associated watersheds. Other streams such as the Trail Fork Big Creek, and Gulf Fork Big Creek are listed due to pathogens from septic tanks. There is very little national forest management can do to address these impaired water bodies other than an overall collaboration/coordination effort with interested parties at a larger watershed scale (4th or 5th level). A listing of Tennessee impaired waters is maintained on the TDEC website. No attempt will be made to list these in the LMP or EIS, although a 303d list will be contained in the planning record.
EP-19	Public Concern: The Forest Service should prepare a list to identify miles of streams not supporting beneficial uses.	Many of the impaired streams referred to contain very little or no national forest ownership within their associated watersheds. Other streams such as the Trail Fork Big Creek, and Gulf Fork Big Creek are listed due to pathogens from septic tanks. There is very little national forest management can do to address these impaired water bodies other than an overall collaboration/coordination effort with interested parties at a larger watershed scale (4th or 5th level). A listing of Tennessee impaired waters is maintained on the TDEC website. No attempt will be made to list these in the LMP or EIS, although a 303d list will be contained in the planning record.
EP-20	Public Concern: The Forest Service should identify critical water supply watersheds and designate them for water supply management prescriptions.	Information has been added to Appendix K of the LMP and to Chapter 3 of the EIS. These lands are allocated to prescriptions that in tandem with forest-wide standards and the riparian prescription will protect water quality on CNF lands. The 9.A.1 prescription would be suitable for the watersheds, but other allocations also meet the overall objectives for these lands. Any site specific protection (beyond LMP direction) deemed necessary will be considered during project development. Within these watersheds there will be an emphasis on collaboration and coordination with other federal, state and local agencies and private landowners to prioritize watershed improvements and other needs.
EP-22	Public Concern: The Forest Service should comply with the State of Tennessee's Best Management Practices for protecting water quality and institute riparian corridors as a management prescription.	The Cherokee National Forest complies with Tennessee BMPs (FW-2) and/or also uses streamside filter zones (FW-3). The overall streamside management zone will be a combination of riparian corridors as described in Prescription 11 and the forest-wide direction contained in FW-2 and FW-3. This concept is explained in the Prescription 11 write-up.
EP-26	Public Concern: The Forest Service should provide water quality monitoring data for use in watershed assessments.	Water quality data that meets data acquisition standards will be shared with TDEC. A summary of the data acquisition efforts will be contained in the annual monitoring and inventory report. This information is available on the Cherokee National Forest website.
EP-27	Public Concern: The Forest Service should include additional standards for water quality protection as recommended by the Environmental Protection Agency.	The Cherokee National Forest complies with Tennessee BMPs (FW-2) and/or also uses streamside filter zones (FW-3). The overall streamside management zone will be a combination of riparian corridors as described in Prescription 11 and the forest-wide direction contained in FW-2 and FW-3. This concept is explained in the Prescription 11 write-up. To reiterate, the streamside management zone concept will be maintained and will be a combination of riparian corridors and slope-related streamside filter zones. Unless a site specific, project analysis determines canopy removal to be a need for riparian restoration or a riparian associated species, canopy cover will be maintained.
EP-31	Public Concern: The Forest Service should designate one or more aquatic species as management indicator species.	The USDA, FS chose to monitor aquatic communities rather than MIS for the following reasons: The use of MIS in controversial because it is based on the assumptions that suitable habitat for the indicator is also suitable for other associated species. For a species to be a good indicator of changes in habitat, it has to be one of the most sensitive members of the community to a particular stressor. These species are often rare and/or difficult to monitor. Species that exhibit these characteristics show inconsistent patterns that cast doubt on their usefulness as indicators. Researchers (citations available upon request) have found that fewer samples are needed to precisely estimate community level attributes than to estimate species attributes and recommend the use of species groups or community indices over individual species for stream fish studies.
EP-32	Public Concern: The Forest Service should provide priority management attention for key aquatic species.	The Riparian Prescription (RX11) is designed to prevent any significant damage to the aquatic environment. The viability of individual species is addressed in the aquatic species viability evaluation (10.2).
EP-33	Public Concern: The Forest Service should provide more information and discussion of Proposed, Endangered, Threatened, or Sensitive aquatic species; and impacts and recovery plans for them.	All 25 federally listed species found on or near the CNF have recovery plans. The determination of effect for aquatic T&E species was "not likely to adversely affect." The FWS concurred with these findings. There are roads and road crossings that contribute sediment to streams, but in insignificant amounts. The highest priority roads (based on sediment and species) are being treated as funds become available.
EP-37	Public Concern: The Forest Service should include an additional goal to require that prescribed fires and wildfire controls should be conducted to minimize pollution of surface waters.	Goals 3 and 5 contain language to achieve this condition for all forest management activities. Forestwide standards FW-18, FW-19, FW-89, FW-93, RX11-13 and RX11-14 are designed to minimize non-point source pollution resulting from fire control activities.
EP-46	Public Concern: The Forest Service should include an additional standard to limit utility corridors and communication sites in certain management prescriptions.	The intent of the plan is to not prevent activities with impacts that can be mitigated. In prescription areas that are legally protected, such as proclaimed wilderness, utility corridors and communication sites are clearly not permitted. In other prescriptions, such uses may be rendered unobtrusive through mitigation activity.
EP-47	Public Concern: The Forest Service should correct the discrepancy between the table in Chapter 2 and the one in Chapter 3 for acres allocated to wilderness study.	Corrections have been made.
EP-48	Public Concern: The Forest Service should recommend more acreage for wilderness study areas because of the growth in demand.	Refer to the EIS, Chapter 2, table labeled "Comparison of Alternatives by Prescription," for disclosure of the range of acres considered for wilderness in development of the CNF revised LMP. The values range from 1,290 acres in Alternative B to 73,

		667 acres in Alternative G. For the remote backcountry – nonmotorized prescription, the range is 0 in Alternative B to 39,166 acres in Alternative E. Should conditions dramatically change, the prescription allocation can be changed through amendment or revision of the revised LMP.
EP-49	Public Concern: The Forest Service should designate all eligible rivers as wild, scenic, or recreational.	Refer to EIS Chapter 3 under “National Wild and Scenic Rivers” for the following text, “River corridors have been allocated to prescriptions that adequately protect or enhance the identified ORVs and free flowing condition.” 2.B prescriptions are not the only prescriptions that provide adequate protection. See response for 6-146.
EP-50	Public Concern: The Forest Service should include acreages designated as Wild Rivers in Table 2-2.	Corrections have been made.
EP-52	Public Concern: The Forest Service should rewrite a wild and scenic rivers objective to develop a management plan for each wild and scenic river by 2010.	See response for 6-146.
EP-54	Public Concern: The Forest Service should include detailed discussions of why certain management prescriptions were developed, what were their goals, and why they were not included in the preferred alternative.	Rationale for the determination of the selected alternative in the Final EIS is contained in the Record of Decision. Here is where the decision for the revised LMP to be implemented is explained in terms that tell the reader why one alternative is favored over others. The alternatives, early on in the process, were designed from the ground up. Working with the public, some thematic outlines were developed and then, the prescriptions built and applied in logical groupings that matched the alternative themes. The resulting alternatives are displayed in the EIS. The Preferred Alternative could not include all of the prescriptions, nor did we want it to. The desired condition; however, is to be created by application of the prescriptions chosen.
EP-56	Public Concern: The Forest Service should provide additional information and analysis of the extent to which current and planned roads impact forest resources.	The CNF has completed the required forestwide roads analysis which is a programmatic level of analysis. Specific roads are not considered in the forestwide analysis. Specific roads and their impacts on forest resources are considered in a subsequent watershed or project level roads analysis.
EP-57	Public Concern: The Forest Service should consider using Maryland Department of Transportation’s floodplain culverts to create more stable stream crossings.	Specific design criteria and alternative designs are developed at the project level. Protection of water quality will be emphasized in the all road design, construction and reconstruction projects.
EP-58	Public Concern: The Forest Service should include an additional objective to inventory for all roads and trails affecting aquatic habitat and plan what to do with them.	The CNF has completed the required forestwide roads analysis which is a programmatic level of analysis. Specific roads are not considered in the forestwide analysis. Specific roads and their impacts on forest resources are considered in a subsequent watershed or project level roads analysis. Protection of water quality is considered in all road design, construction and reconstruction projects. Trails that are clearly a source of water quality degradation are also a priority for mitigation.
EP-61	Public Concern: The Forest Service should rewrite Goal 49 to provide for a safe and efficient transportation system.	Goal 50 includes the statement listed.
EP-62	Public Concern: The Forest Service should renumber Goal 49 to Objective 52.02.	Goals and objectives are carefully developed and labeled to provide the intended direction.
EP-64	Public Concern: The Forest Service should work to repair OHV trails and control sedimentation from ground disturbing activities.	Refer to Chapter 2 of LMP under “Watersheds” for standard related to OHV trails and stream zones. See response for 5-66.c.
EP-65.	Public Concern: The Forest Service should follow those prescriptions allocated in Alternative A for OHV use in North Indian Creek watershed.	The existing Buffalo Mountain OHV area is not located in the actual North Indian Creek watershed. Only a very small portion of the 7.C prescription is located in the actual North Indian Creek watershed and the sub-drainage affected flows into North Indian Creek downstream from the Johnson City water intake. As delineated, the 5th level North Indian Creek watershed includes composite streams that actually drain directly into the Nolichucky River. One of these is the Straight Creek/Dry Creek drainage where most of the OHV area and 7.C allocation are located. A portion of the 7.C area drains into Buffalo Creek that is a tributary of the Watauga River. See response for 5-66.c.