Appendix B

Analysis Of
Scoping Comments

Big Creek Project

Twenty letters and e-mails were received during the scoping period of 2/26/2009 to 4/03/2009. The letters were analyzed by Vern Maddux, Joe McGuiness, Marcia Carter, Tom Rowe, and Stephanie Medlin on 4/07/2009 and an analysis code assigned to the comments.

Comment Analysis Codes

BC1: Outside the scope of the proposed action
BC2: Already decided by law, regulation, Forest Plan, or other higher level of decision
BC3: Irrelevant to the decision to be made
BC4: Conjectural and not supported by scientific evidence
BC5: General comment, suggestions, opinion, or position statement
BC6: Other agency or partner's consultation, review, advice, recommendations, etc.
BC7. Lack of Early Successional Habitat.
BC8. Maintain Basal Area below 20.
BC9. Create ES edge around Wildlife Openings.
BC10. Use Herbicide instead of chainsaw in Mast Tree thinning.
BC11. Clear-cut instead of Shelterwood.
BC12. Limit rhododendron thinning to roadsides and streams adjacent to regeneration areas.
BC13. Limit herbicide use in midstory treatments to rhododendron, laurel, and red maple. Do not treat sugar maple or ash.
BC14. Oppose C242/St30 Midstory treatment.
BC15. Oppose creating wildlife openings.
BC16. Oppose adding road OR-9 to the system.
BC17. Already considered in the proposed action or is standard procedure.
BC18. Replace fescue and orchard grass with warm season grasses.
BC19. No ground disturbance in Mesic areas and interior forests to prevent nonnative invasive species spread.
BC20. Effects of project on Climate change/Carbon sequestration
BC21. Skeptical of the Ecological benefits of planting nonnative shrubs

Codes 1-6 are standard codes. Comments assigned these codes are considered to be non-significant issues. Codes 7-20 were derived from comments specific to this project and warranted further discussion to decide significance. Code 17 was added during comment analysis as a category for suggestions that are already proposed or for procedures that are routinely done.

Vern Maddux, Joe McGuiness, Marcia Carter, and Tom Rowe met on 4/14/2009 and determined significance of the issues developed at the 5/23/2008 meeting.

From the discussion below, the following issue was considered to be directly or indirectly caused by implementing the proposed action and is a significant issue for this project:

1. Early Successional Habitat is lacking. (From BC 7)

Issue Significance Discussion:

BC 7. Lack of Early Successional Habitat.

Prescription area 7.E.2 has an early successional objective of from 4 to 10%. On the suitable acreage where regeneration is proposed (Compartments 242, 243, 244, and 249), the proposed action results in about 7.8% early successional habitat. This proposal at this time regenerates stands qualifying for regeneration by commercial harvest, after considering all other resource constraints. Further creation of early successional habitat by non-commercial means is beyond the scope of the proposed action.

This issue is significant to this project.

BC 8. Maintain Basal Area below 20.

A minimum of 15 BA must be left in any regeneration treatment over 10 acres (Forest-wide Standard 34). This will be the prescribed leave basal area in all regenerated areas unless greater leave is needed for scenery mitigation. The leave basal area may be clumped and variable, allowing some areas without overstory.

This issue is non-significant to this project.

BC 9. Create ES edge around Wildlife Openings.

Most of the wildlife openings in this project area are linear openings; roads maintained as open area wildlife foraging areas. Although 12.64 miles of these are proposed for daylighting to improve sunlight into these openings, linear openings do not lend themselves well to purposely creating early successional habitat in strips along them. The daylighting will to some extent encourage sprouting and provide an early successional habitat component. Other open areas are within the Appalachian Trail corridor and subject to visual constraints.

This issue is non-significant to this project.

BC 10. Use Herbicide instead of chainsaw in Mast-tree thinning.

This suggestion is an attempt to retain vertical cover for grouse for a little longer by leaving treated stems standing instead of cutting them off. Treating competing stems with herbicide may result in deadened stems standing 2-3 years longer. Chain sawn stems seldom fall completely, instead are held up on surrounding vegetation at varying angles, so some vertical cover is retained. Sprouting of chain sawn stumps actually prolong the early successional cover for a few years, and this benefit would be lost if these stems were treated with herbicide. Herbicide treatments are also more expensive. Using a chainsaw is an effective means to accomplish the objective of releasing mast-producing species from immediate competition for light.

This issue is non-significant to this project.

BC 11. Clear-cut instead of Shelterwood.

See discussion under BC 8. Clumping the required leave basal area will allow some areas to regenerate without overstory, providing maximum stem density.

This issue is non-significant to this project.

BC 12. Limit rhododendron thinning to roadsides and streams adjacent to regeneration areas.

The rhododendron thinning proposed might be more accurately described as "trimming". The objective is not to eradicate rhododendron, but to trim it back enough to increase the amount of light onto streams to improve the fisheries through insect production.

This issue is non-significant to this project.

BC 13. Limit herbicide use in midstory treatments to rhododendron, laurel, and red maple. Do not treat sugar maple or ash.

Sugar maple, ash, basswood, oaks, walnut, butternut, hickories, black cherry, dogwoods, and hemlock are excluded from treatment now.

This issue is non-significant to this project.

BC 14. Oppose C242/S30 Midstory treatment.

The proposed action will be modified to drop this stand from midstory treatment.

BC 15. Oppose creating wildlife openings.

No new wildlife openings are created in this proposal. The planting of mast-producing shrubs in skid trails and landings on 32 acres within the harvested areas are proposed to enhance wildlife forage as the stands regenerate. These areas will not be maintained as open area.

This issue is non-significant to this project.

BC 16. Oppose adding road OR-9 to the system.

Opposition to this road seems to be because of some confusion about it's role in illegal ATV traffic, and why an adjacent poplar stand suggested during pre-scoping could not be commercially thinned because of the ATV use.

Old Roads (OR) 11 and 12; and Outlaw (OUT) 12 are the roads that are receiving the majority of the illegal ATV use in this area and these roads are proposed for decommissioning (Item 12).

OR-9 was determined during the Roads Analysis Process to be needed for long-term resource management needs; OR-11, OR-12, and OUT-12 were not.

The poplar stand in question was not proposed for commercial thinning because thinning poplar usually results in damage to the residual stems and epicormic sprouting of the residual so it is not usually silviculturally desirable. It is doubtful there would be a market for the young poplar at this time, making commercial thinning unfeasible. Midstory treatments could accomplish the objectives of moving this stand towards more diversity, until the stand matures and could be commercially regenerated in 10-20+ years and this stand is proposed for midstory treatments.

This issue is non-significant to this project.

BC 17. Already considered in the proposed action or is standard procedure.

Several comments suggested projects that were already part of the Proposed Action; or suggested that we conduct surveys or analysis that are already routinely accomplished.

This issue is non-significant to this project.

BC 18. Replace fescue and orchard grass with warm season grasses.

Fescue and orchard grass are being phased out. Not all sites are appropriate for warm season grasses. Native species and non-invasive species are used during seeding.

This issue is non-significant to this project.

BC 19. No ground disturbance in Mesic areas and interior forests to prevent nonnative invasive species spread.

Restricting activities in mesic areas would prevent accomplishing the Desired Conditions for this area as directed by the *Revised Land and Resource Management Plan*. Nonnative invasive species treatments are planned to ameliorate invasive species introduction resulting from activities planned to carry out Plan direction.

This issue is non-significant to this project.

BC 20. Effects of project on Climate Change/Carbon Sequestration

Climate change can affect the resources in the project area and the proposed project can affect climate change through altering the carbon cycle. Climate models are continuing to be developed and refined. The impacts of global carbon sequestration and atmospheric concentrations of CO_2 of this project are miniscule.

The forests of the United States significantly reduce atmospheric concentrations of CO_2 resulting from fossil fuel emissions. The forest and wood products of the United States currently sequester approximately 200 teragrams 200 teragrams, or Tg, equals 196,841,306 US tons. of carbon per year (Heath and Smith, 2004). This rate of carbon sequestration offsets approximately 10% of CO_2 emissions from burning fossil fuels (Birdsey et al., 2006).

U.S. Forests currently contain 66,600 teragrams of carbon. The short-term reduction in carbon stocks and sequestration rates resulting from the proposed project are imperceptibly small on global and national scales, as are the potential long-term benefits in terms of carbon storage.

(See Literature Cited section in EA for citations)

This issue is non-significant to this project.

BC 21. Skeptical of the Ecological benefits of planting non-native shrubs

Non-native invasive shrubs such as autumn olive and oriental bittersweet are not planted. Apples are the only nonnative mast-producing species commonly planted. Plantings of mast-producing shrubs for wildlife forage are done to supplement what may or may not naturally regenerate. Enhancing wildlife habitat is a driving force for vegetation management on the Cherokee National Forest.

This issue is non-significant to this project.

Big Creek Comment Analysis

Letter #, From	Comment	Disposition
#1. Rick Ledbetter	Lack of Early Successional Habitat	BC 7
	Project Planning should be a collaborative restoration process;	BC 1, BC 3, BC 5
	Protect Tennessee Mountain Treasures Areas;	BC 2
	Oppose harvest in Laurel Mountain Tennessee Treasures;	BC 2
	Big Creek area forms an essential landscape conservation connection	BC 1, BC-2
	Bolster landscape connectivity, remove roads.	BC 5
	Primary focus should be ecological restoration.	BC 2, BC 5, BC 17
	Thin white pine dominated stands	BC 17
	How will these stands be restored?	BC 5
	Limit herbicide use in midstory treatments to rhododendron, laurel, and red maple.	BC 13
	Conduct rare species surveys (Silene Ovata, particularly)	BC 2, BC 5, BC 17
	Oppose C242/St30 Midstory treatment.	BC 14
#2. Catherine Murray	Continue to look for opportunities for Objectives 17.01 and 17.02	BC 5
	Additional restoration opportunities in C243/St3, 8, and 50; C244/st15, 41, and 61	BC 5, BC 17
	Restore the Gulf Tract	BC 5, BC 17
	The over-built road system should be a major focus of restoration (RAP)	BC 1, BC 5
	We oppose adding road OR-9 to the system	BC 16
	Classifying new roads in violation of Forest Plan	BC 1, BC 2
	Existing old growth should be identified	BC 1, BC 3, BC 17
	Concerns about the methodology CNF uses to determine existing old growth.	BC 1, BC 2, BC 3, B 5
	The need for an old growth network should be addressed	BC 1, BC 2, BC 3, B 5
	Area is heavily affected with invasive exotic plants	BC 17

Letter #, From	Comment	Disposition
#2. Catherine Murray (Continued)	Avoid soil disturbance activities in mesic areas and interior forests to prevent nonnative invasive spread	BC 19
	Consider the effects on climate change and carbon sequestration	BC 20
	What is the history of prescribed burning and wildfires in the area?	BC 1, BC 3
	Protect scenic values, trails, cultural resources, recreation, and tourism values	BC 1, BC 2, BC 5, BC 6, BC 17
	Supports Brook Trout restoration	BC 5
	Oppose the creation of additional WLO's	BC 15
	Protect plants, wildlife, rare and sensitive communities	BC 2, BC 17
	Economics and Public benefit	BC 2
	This project violates the Revised Forest Plan	BC 1, BC 2
#3. Karen Bucher	Protect Big Creek watershed	BC 2, BC 5
#4. Steve Henson Southern Appalachian Multiple-Use Council	Supports proposal	BC 5
	Lack of Early Successional Habitat	BC 7
	Maintain BA < 20	BC 8
	Create ES edge around WLO	BC 9
	Use Herbicide instead of Chainsaws in Mast tree release.	BC 10
	Develop recurring burn plan	BC 1, BC 2
	Designate/restrict road uses to reduce conflicts	BC 5
#5. Greg Isenberg RGS	Lack of Early Successional Habitat	BC 7
	Clear-cut instead of shelterwood or modify shelterwood.	BC 11
	Consider access for elderly and handicapped during RAP	BC 5, BC 17
	Limit rhododendron thinning to roadsides and streams adjacent to regeneration	BC 12
#6. Gerald Cody	Lack of Early Successional Habitat	BC 7
	Supports proposal	BC 5
#7. Jeffrey Jervis	Supports project	BC 5
#8. Charles Kovitz	Lack of Early Successional Habitat	BC 7
	Supports project	BC 5
#9. Dwayne Hopson	Supports project	BC 5
#10. Rick Bowers	Supports project	BC 5
	Lack of Early Successional Habitat	BC 7
#11. Morgan Sommerville ATC	Visibility from AT	BC 2, BC 17

Letter #, From	Comment	Disposition
#12. Josh Kelly WILDLAW	Supports road decommissioning, release of mast trees, control invasives, support clear-cutting white pine stands, supports midstory treatments.	BC 5
	Limit herbicide use in midstory treatments to rhododendron, laurel, and red maple. Do not treat sugar maple or ash.	BC 13
	Oppose SW harvest in Laurel Mountain Tennessee Mountain treasure.	BC 2
	Oppose C242/St30 Midstory treatment.	BC 14
	Oppose creating wildlife openings	BC 15
	Oppose adding road OR-9 to system.	BC16
	Undertake a thorough RAP.	BC 2, BC 5, BC 17
	Continue to look for opportunities for Objectives 17.01 and 17.02	BC 5
	Conduct rare species surveys (Silene Ovata, particularly)	BC 2, BC 5, BC 17
	Leave some forested areas along daylighted roads.	BC 5, BC 17
#13. Joe Deloach TEHC	No comments	BC 5
#14. Don Mallicoat RGS	Supports project Lack of Early Successional Habitat	BC 5 BC 7
#15. Mark Banker RGS	Lack of Early Successional Habitat Supports project	BC 7 BC 5
#16. Parker Street	Supports project Maintain BA < 20 Replace fescue and orchard grass with warm season grasses. Daylight WLO, add waterholes Maximize Early Successional Habitat	BC 5 BC 8 BC 18 BC 7, BC 17 BC 7

Letter #, From	Comment	Disposition
#17. Hugh Irwin SELC	Activities do not address the Region 8 restoration initiative	BC 5
	Big Creek area forms an essential landscape conservation connection	BC 1, BC 2
	Primary focus should be ecological restoration.	BC 2, BC 5, BC 17
	Oppose activities in Laurel Mountain Tennessee Treasures.	BC 2
	Oppose C242/St30 Midstory treatment.	BC 14
	Restore the Gulf Tract	BC 5, BC 17
	The over-built road system should be a major focus of restoration (RAP)	BC 1, BC 5
	Consider the environmental effects of roads	BC 1, BC 5
	Existing old growth should be identified	BC 1, BC 3, BC 17
	The need for an old growth network should be addressed	BC 1, BC 2, BC 3, BC 5
	Area is heavily affected with invasive exotic plants	BC 17
	Skeptical of the Ecological benefits of planting nonnative shrubs	BC 21
	Project Planning should be a collaborative restoration process	BC 1, BC 3, BC 5
	Effects of the project on climate change and carbon sequestration	BC 20
#18. Jeff W. Richards	Supports Project	BC 5
	Lack of Early Successional Habitat	BC 7
#19. Candace Dinwiddie Tenn. Forestry Association	Objectives 17.01 and 17.02 are redundant.	BC 2, BC 5
	Daylighting is a service not commercial timber harvest.	BC 5
	Streamline treatment needs reworded.	BC 5
	Use recreational fishing for Rainbow Trout removal.	BC 4
	Harvesting < 1% of the annual growth is not sustainable.	BC 5
	Review market conditions before advertising sales.	BC 3
	Road costs make commercial harvests less profitable.	BC 1, BC 3

Letter #, From	Comment	Disposition
#20. Lisa C. Stopp United Keetoowah Band of Cherokee Indians in Okla.	No objections	BC 6