

DECISION NOTICE  
AND  
FINDING OF NO SIGNIFICANT IMPACT

For

**Amending the Nantahala and Pisgah  
Land and Resources Management Plan –**

**Changing the List of Management Indicator Species, the Species  
Groups to be Monitored, and Associated Changes to Forest Plan  
Direction**

June, 2005

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# 1. INTRODUCTION

This Decision Notice (DN) and Finding of No Significant Impact (FONSI) documents my decision Amending the Nantahala and Pisgah Land and Resources Management Plan (Forest Plan or the Plan) and changing the list of management indicator species (MIS), the list of species groups to be monitored as a part of the overall Forest monitoring plan, and associated changes to Forest Plan direction.

I have reviewed the Environmental Assessment (EA) for this plan amendment. I have considered the comments received during scoping. I have given serious thought to and weighed the potential tradeoffs from the alternatives to come to a reasoned choice for how to proceed.

## 2.0 DECISION

It is my decision to select Alternative 3. This will amend the Forest Plan as described below:

### CHANGES TO THE MIS LIST, SPECIES GROUP MONITORING, AND ASSOCIATED PLAN DIRECTION

Alternative 3 has 18 MIS and 9 species groups to be monitored. The 18 MIS include 2 mammals, 6 birds, 4 plants, and 6 fish. The species groups include 5 animal species groups and 4 plant species groups.

Alternative 3 is described in detail below:

PREVIOUS PLAN LANGUAGE	NEW PLAN LANGUAGE (Alt 3)
<p><b>From page III-22, Botanical, Wildlife, and Fish Resource Management:</b></p> <p><u>General Direction:</u> "1. Use Management Indicator Species (MIS) for monitoring populations and habitat conditions for all existing native vertebrates (see Chapter III of the accompanying EIS for a list of species).</p> <p><u>Standard:</u> "a. Use additional MIS for project level analysis as necessary in order to respond to specific issuers or concerns."</p>	<p><u>General Direction:</u> "1. Use the following Management Indicator Species (MIS) to help indicate effects of plan implementation on fish and wildlife resources:</p> <p>Mammals: Black bear, white-tailed deer            Birds: Pileated woodpecker, ovenbird, rufous-sided towhee, pine warbler, acadian flycatcher, ruffed grouse            Fish: Wild brook trout, wild brown trout, wild rainbow trout, blacknose dace, smallmouth bass, largemouth bass            Plants: Ginseng, ramps, Fraser fir, Carolina hemlock."</p> <p><u>Standard:</u> "Select MIS from the forest-wide MIS list for use in project-level analysis as appropriate to help indicate project effects on fish and wildlife resources."</p>

PREVIOUS PLAN LANGUAGE	NEW PLAN LANGUAGE (Alt. 3)
<p>From page III-23, Botanical, Wildlife, and Fish Resource Management (continued)</p> <p><u>General Direction:</u> "3. Maintain viable populations of existing native and desired non-native vertebrate species in the planning area. Protect the following community types when identified as unique in the botanical or wildlife analysis; caves and rare plant communities including bogs, rock cliffs, granitic domes, high elevation rocky summits, barrens and glades, balds, boulder field forests and seeps (Refer to the Supplemental EIS, Appendix L for descriptions of these communities).</p>	<p><u>General Direction:</u> "3. Maintain viable populations of existing native and desired non-native vertebrate species in the planning area. Protect the following community types when identified as unique in the botanical or wildlife analysis; caves and rare plant communities including bogs, rock cliffs, <b>rock outcrops</b>, granitic domes, high elevation rocky summits, barrens and glades, balds, boulder field forests and seeps (Refer to the Supplemental EIS, Appendix L for descriptions of these communities).</p>
<p>From page IV-6: Direction" Use Management Indicator Species (MIS) for monitoring populations and habitat conditions</p>	<p>Direction: Use Management Indicator Species (MIS) to help indicate effects of plan implementation on fish and wildlife resources:</p>
<p>From page D-2: Monitor Management Indicator Species populations and habitat.</p>	<p>Monitor management indicator species to help indicate effects of plan implementation on fish and wildlife resources.</p>
<p>From D-7: Over the next five years, a system of permanent points will be established representing all land type associations on the Pisgah and Nantahala National Forests. These permanent points will be used to survey for the following plants and animals:  Breeding birds (including cowbirds)  Salamanders  Aquatic invertebrates  Invasive exotic plants  Rich cove plants</p> <p>The following species will be monitored bait station or game data:  Black bear  Eastern wild turkey  White-tailed deer</p> <p>Species and habitat components may be added or subtracted from this list as the system is established and feasibility questions are answered. Any changed to this list will be described in the Annual Monitoring and Evaluation Report.</p>	<p>*See replacement Table D-3 below.</p>
	<p>**Add Table D-4 below.</p>

**Table D-3. Species groups to be monitored (NOT MIS):**

SPECIES GROUP	MONITORING METHOD	WHY MONITORED
Aquatic Invertebrates	Stream surveys	To evaluate stream health and diversity
Freshwater Mussels	Stream surveys	To detect the presence of several Threatened, Endangered, and Sensitive mussel species
Breeding Birds	Point counts (sight & sound)	As a part of the Region 8 landbird conservation strategy
Bats	Mist netting and/or Anabat (sound detection)	To detect presence of Threatened, Endangered, and Sensitive species and evaluate diversity
Rich Cove Plants	Surveys	To evaluate species diversity, habitat relationships, and forestwide distribution
Non-native Invasive Plants	Transects	Some invasives are a threat to native species
Salamanders	Surveys	To evaluate species diversity, habitat relationships, and forestwide distribution
Pine-Oak Heath	Surveys	To evaluate changes to community composition and structure
Oak Plant Communities	Surveys	To evaluate changes to community composition and structure

**Table D-4. Management Indicator Species:**

INDICATOR	REASONS FOR SELECTION
Black bear	Helps indicate the effects of management on old forest communities, hard mast, and large contiguous forest areas with low levels of human disturbance.
White-tailed deer	Helps indicate the effects of management on permanent grass/forb habitat, and ability of national forests to provide public hunting opportunities.
Pileated woodpecker	Helps indicate the effects of management on abundance of snags.
Ovenbird	Helps indicate the effects of management on species associated with large areas of contiguous mature deciduous forest.
Rufous-Sided (Eastern) Towhee	Helps indicate the effectiveness of management at maintaining early successional (0-10 years) habitat .
Pine warbler	Helps indicate the effects of management on species associated with xeric yellow pine forests.
Acadian flycatcher	Helps indicate the effects of management on species associated with riparian forests.
Ruffed grouse	Helps indicate the effects of management on species associated with early successional habitat (11-20 years), soft mast producing species, and ability of national forests to provide public hunting opportunities.
Wild brook trout	Helps indicate the effects of management on a portion of coldwater streams, and ability of national forests to provide public fishing opportunities.
Wild brown trout	Helps indicate the effects of management on a portion of coldwater streams, and ability of national forests to provide public fishing opportunities.
Wild rainbow trout	Helps indicate the effects of management on a portion of coldwater streams, and ability of national forests to provide public fishing opportunities.

**Table D-4. Management Indicator Species (continued):**

<b>INDICATOR</b>	<b>REASONS FOR SELECTION</b>
Blacknose dace	Helps indicate the effects of management on species associated with lower trophic levels of cold water streams.
Smallmouth bass	Helps indicate the effects of management on lower-elevation, warmwater stream communities.
Largemouth bass	Helps indicate the health of reservoir fisheries, and ability of national forests to provide public fishing opportunities.
Ginseng	Helps indicate effectiveness of management at maintaining mixed mesophytic plant communities, i.e. Rich Coves, and for maintaining sustainable ginseng harvests.
Ramps	Helps indicate the effects of management on northern hardwood forests communities.
Fraser fir	Helps indicate effectiveness of management at maintaining fir-dominated communities at high elevations.
Carolina hemlock	Helps indicate effectiveness of management at maintaining Carolina hemlock communities.

### **3.0 REASONS FOR MY DECISION**

In 1994, many units within the Forest Service were expanding their lists of MIS, expecting to use them for various illustrative purposes outside the literal requirements of the regulations. Forest Plan Amendment 5 (1994) incorporated this thinking and expanded the Forests' MIS list from 20 species to 63 species plus 7 species assemblages. This approach proved problematic. Critical scientific review has identified limits to the application and usefulness of the MIS concept. For example: there are often only loose relationships between indicator species populations and habitat quality; effects to indicator species may have limited value in predicting effects to other species; and tracking forest structural features as indicators may provide more meaningful information than tracking indicator species. In addition to these scientific criticisms, recent court rulings have refined our understanding of legal requirements related to MIS. This legal clarification adds to the need to take a hard look at the species selected as MIS.

After over a decade of implementing the MIS list developed in conjunction with Forest Plan Amendment 5, this lengthy list of MIS has not served to provide additional information to forest managers commensurate with the analysis effort required by MIS regulatory requirements. Due to the required documentation, having several MIS for the same habitat is an inefficient use of valuable and limited human resource assets. There is a need to streamline the MIS list for the Nantahala and Pisgah National Forests for the following reasons:

- To reduce redundancy. Some MIS are redundant in that several MIS are representing identical communities and habitats. This redundancy is using limited resources for analysis activities that are not providing substantial additional information on effects to communities and habitats.
- To select species that better represent a specific habitat. Species that are habitat generalists may not make good representatives for specific habitats when a more habitat-specific species can be selected.

- To remove from the list MIS whose population trends cannot be tied to management. For some species, population trends are difficult to establish, and population fluctuations are due to a combination of factors and events, many of which may be unrelated to national forest management.
- To increase the efficacy of the MIS list by removing species associated with protected special habitats. Forest Plan direction and standards provide protection for several “special habitats” such as balds, bogs, rock cliffs, and others. In these cases, MIS serve no useful purpose for analyzing the effects of management.
- To remove from the list MIS that are actually multi-species assemblages and therefore inappropriate as MIS. Multi-species assemblages, or “species groups” are more appropriately utilized for monitoring purposes separately from MIS legal requirements.

Species group monitoring, which is separate from MIS requirements, is a way to evaluate what’s happening with whole groups of plants and animals. In addition to changing the MIS list, this amendment would place more emphasis on species group monitoring, which is an approach I expect to provide additional meaningful information in the long run.

I have considered the tradeoffs associated with any possible loss of species-by-species information. As a decision-maker, I am most concerned with impacts of our actions on forest communities. These impacts can be analyzed without need of analyzing effects to any particular individual species such as a MIS. I am also very concerned with any impacts to Threatened, Endangered, or Sensitive species, and these are analyzed in every project environmental assessment, regardless of MIS status. Separate analysis for several individual species occupying the same habitat or using the same habitat components is not providing more or better information upon which to base a decision – it is basically providing very similar information repeated over and over again and is therefore redundant. It makes our environmental analyses more voluminous but not more insightful.

#### **4.0 SCOPING, PUBLIC INVOLVEMENT, AND PUBLIC COMMENTS**

After initial internal scoping, USDI Fish and Wildlife Service, North Carolina Wildlife Resources Commission, and North Carolina Division of Environment and Natural Resources personnel were contacted in regard to this amendment beginning in late November 2004 and continuing through January 2005. Following this, a scoping letter was mailed to approximately 300 individuals and organizations on the Nantahala/Pisgah Forest Plan mailing list in late January 2005. The letter was also posted on the National Forests in North Carolina website. A legal notice was published in the newspaper of record, the Asheville Citizen-Times, on February 1, 2005. The scoping letter had offered interested parties an opportunity to meet and discuss the amendment, and on February 10,

2005, Forest Service personnel met with representatives of four organizations. Telephone contact was made with several other interested parties.

Ten scoping comments were received from individuals and organizations, including other agencies. Numerous comments questioned the selection of one species versus another, questioned whether the list of species retained would be adequate, or had other concerns. All these comments were summarized and responded to individually in Appendix C of the EA – Response to Scoping Comments.

From the scoping comments two significant issues were identified: lack of consistency in the retention or non-retention of species, and concern with the oak plant communities. In response to the significant issues Alternative 3 was developed – which I have selected to implement. A letter with this alternative, summarized comments, and responses was sent to the ten respondents in late April 2005. The letter also offered additional opportunity to meet and discuss the amendment. Follow-up phone calls were made to make commenters aware of our additional alternative and ensure we had accurately captured their concerns. Based on these discussions, I determined the issues and concerns had been adequately described and addressed.

## **5.0 ALTERNATIVES CONSIDERED**

A total of three alternatives were analyzed in detail. Alternative 3 as described in section 2.1 in the EA is the alternative selected for implementation. Alternatives 1 and 2 are briefly described below, along with my rationale for not selecting them.

**Alternative 1 – No Action:** This alternative proposed no change to the MIS list or species group monitoring.

**Rationale for Not Selecting This Alternative:** Leaving the MIS list with 63 species and 7 multi-species assemblages is simply unacceptable from the standpoint of efficient use of resources. Selecting this alternative leaves us with inappropriate indicators and unnecessary redundancy. It does not meet the propose and need for the proposal as described in the EA.

**Alternative 2:** This was the proposed action as scoped. It reduced the list of MIS to 18 species and called for monitoring 7 species groups.

**Rationale for Not Selecting This Alternative:** While Alternative 2 does meet the purpose and need for the proposal, there exists a level of redundancy and inconsistency among the retained MIS somewhat higher than in Alternative 3 (see Table 2.2 – Comparison of Alternatives in the EA). In addition, red oak, while an important species for many reasons and retained as an MIS in Alternative 2, may not entirely serve the

purposes of MIS. The oak plant community monitoring included in the selected alternative (Alt. 3) may be a more meaningful approach for providing managers useful information.

## **6.0 FINDINGS REQUIRED BY LAWS AND REGULATIONS**

1. This amendment does not change any Forest Plan goals, objectives, desired conditions, management prescriptions, land allocation, timber suitability, or type or amount of outputs of good or services provided. In particular, it does not change the habitat objectives for maintaining viable populations as identified in the Final Supplement to the Final Environmental Impact Statement (Volume II) for Forest Plan Amendment 5. The scope of this decision is limited to adding or deleting management indicator species, adding species groups to be monitored, and associated wording changes in the Forest Plan. Neither the timing of this decision, the location, nor size of the area affected are grounds for considering this to be a significant amendment, since this amendment has no impact to forest resources. Therefore, this would not be a significant amendment to the Forest Plan (EA Chapter III pg. 40).
2. This amendment will meet all requirements of the Endangered Species Act and all agreements with the State Natural Heritage Program, in that there would be no impacts to Threatened, Endangered, and Sensitive species or critical habitat for these (EA Appendix A).
3. The amendment is reasonable and feasible. Implementation of some new monitoring protocols for the new species groups will be needed; however the Forest has the requisite expertise and access to additional external expertise.
4. There are no irreversible or irretrievable resource commitments (EA Chapter III pg. 19) and no loss of long-term productivity (EA Chapter III, pg. 39) since this is essentially a procedural amendment to the Forest Plan and has no ground disturbing effect.

## **7.0 FINDING OF NO SIGNIFICANT IMPACT**

I have determined that this Plan Amendment is not a major federal action, individually or cumulatively, and will not have a significant impact on the quality of the human environment. Therefore, an environmental impact statement will not be prepared. I have considered both context and intensity in my determination, based on environmental analysis documented in the Environmental Assessment.

## CONTEXT

This Plan Amendment changes the list of MIS, changes the list of species groups to be monitored apart from MIS, and makes associated wording changes in Forest Plan direction. The outcomes anticipated from this amendment are: there would be less redundancy in the environmental assessments for projects; and there would be changes in the amounts and types of field data collected for forest-wide monitoring purposes. It would not have direct, indirect, or cumulative effects on any forest resource.

## INTENSITY

Both beneficial and adverse impacts are considered. There will be no significant effects as a result of the action (EA Chapter III). The nature of the impacts of this proposal has to do with the availability of certain information, the analysis presented to inform decision makers, and the type of monitoring activities that will occur in the future.

The actions will have no discernible effects on the public health and safety (EA Chapter III, pg. 38). Any activities related to the changes in monitoring will be similar to other forest related outdoor activities such as hiking or nature study.

The actions will not have any detrimental effects on any unique characteristics of the geographic area such as historical and cultural resources, prime farm lands, rangelands, parklands, wetlands, wild and scenic rivers, or ecologically critical areas (EA Chapter III pp. 20-22, & 38).

Based on public involvement and analysis, the effects on the quality of the human environment are not highly controversial (EA pp. 6-8 and Appendix C).

The actions do not involve highly uncertain, unique, or unknown environmental risks to the human environment (EA throughout Chapter III). No direct, indirect, or cumulative effects would occur to any forest resource.

This amendment will change the nature of the analysis of effects in future project environmental assessments, and will change some forest-wide monitoring activities. These changes should provide less redundancy in environmental assessments and should provide additional baseline information for Forest Plan revision.

The cumulative effects of the proposed actions have been analyzed and no significant effects are anticipated (EA pp. 19, 20, 22, 27, 33, 36, 38).

This action does not adversely affect cultural resources listed or eligible for listing in the National Register of Historic Places and will not cause loss or destruction of significant scientific, cultural, or historical resources (EA pg. 38).

This amendment will have “no effect” on Threatened or Endangered Species and “no impacts” on Sensitive Species. The amendment will not result in a trend to federal listing or cause a loss of viability of any Sensitive species (EA Appendix A).

This action does not threaten to lead to violation of federal, state, or local laws imposed for the protection of the environment, since there will be no direct, indirect, or cumulative effects on any natural resource.

## 8.0 APPEAL RIGHTS

This decision is subject to appeal pursuant to 36 CFR 217. Any appeal of this decision must be fully consistent with 36 CFR 217.9, “Content of a notice of appeal.” Written appeals, including attachments, should be sent to USDA Forest Service, Southern Region, ATTN: Appeals Deciding Officer, 1720 Peachtree Road, N.W., Suite 811 N, Atlanta, Georgia 30309-9102. Appeals must be postmarked or received within 45 days after the date this notice is published in *The Asheville Citizen-Times*. Appeals may be faxed to (404) 347-5401. Hand-delivered appeals must be received within normal business hours of 8:00 a.m. to 4:30 p.m. Appeals may also be mailed electronically in a common digital format to [appeals-southern-regional-office@fs.fed.us](mailto:appeals-southern-regional-office@fs.fed.us).

For further information on this decision, contact Ruth Berner, Forest Planner, as (828) 257-4862.

## 9.0 EFFECTIVE DATE

Amendment 17 will become effective on October 1, 2005.



JOHN F. RAMEY  
Forest Supervisor  
National Forests in North Carolina

6/2/05

Date