

Nantahala-Pisgah Forest Partnership

*A lasting voice for innovative management and investment in the
public forests of North Carolina's mountains.*

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Proposals for the
Nantahala Pisgah National Forest Plan Revision on
Preliminary Plan Content, Geographic and Management
Area Building Blocks

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INTRODUCTION

We, the Nantahala-Pisgah Forest Partnership (“Partnership”), are a collaborative of over 30 organizations representing a diverse cross-section of public lands interests, including recreation, forest products, cultural heritage, conservation, wildlife, hunting, angling as well as other forest user groups. The Partnership was created in February of 2013 with the goal of working collaboratively and in parallel to the US Forest Service planning process to develop recommendations for a new forest management plan for the Nantahala and Pisgah National Forests. Our approach strives to reach community-supported, science-based methods for forest management, interpretation, and investment. The Partnership has always been an open and transparent collaborative, with membership open to all stakeholders of interest in the plan revision process. Our charter is posted online¹, and our monthly meetings are open to anyone who would like to observe. Beyond the forest plan, we are committed to creating a lasting voice for innovative management and public investment in the public forests of North Carolina’s mountains for the future.

The vision statement of the partnership is as follows:

We envision a thriving, resilient forest within its natural range of variation, able to support healthy ecosystems, wildlife populations, local economies, and traditional uses. We envision a forest with the connectivity and integrity to remain resilient in the face of the changes and challenges of the future.

Over the last four and a half years the Partnership has initiated a robust public dialogue in support of the planning process. The Partnership utilizes a variety of sources including national, regional, tribal, and local/community expertise with an emphasis on public participation and information sharing in order to reach consensus. The following proposals reflect the over 250 hours of general meetings and countless hours of offline meetings and individual stakeholder work, in which members and affiliate organizations developed and vetted proposals, shared concerns, built understanding and developed solutions to accommodate all members’ values and interests.

The proposals presented in this document provide information both on a fine scale and landscape scale. General proposals for goals, objectives to set the pace toward those goals, and sideboards to protect special values, as well as shared visions for specific places are provided to modify or complement Forest Service drafts. As described further in the reader’s guide, the proposals reflect the diversity of the Partnership interests and also present alternatives and varying levels of consensus. The Partnership continues to be open and welcoming of dialogue with the Forest Service concerning these proposals and the planning process as a whole².

¹ See <http://npforestpartnership.org>

² The general email address of the Partnership is npforestpartners@gmail.com.

While the Partnership was created as a collaborative to inform the planning process, we intend to continue our work through the implementation process and on the project level. In addition, the Partnership has been involved, and will continue to be involved, with issues relating to the National Forest system as a whole as well as on the legislative and federal level. The Partnership plans to continue to give input throughout the life of the planning process and will be submitting additional proposals and feedback related to the Environmental Impact Statement and alternative development process.

READER'S GUIDE

In accordance with the mission of the Nantahala-Pisgah Forest Partnership (Partnership), we have actively worked to achieve broad consensus on a set of agreements, for the Nantahala Pisgah Forest Plan, that balances all stakeholder needs as fully as possible. Our process allowed for a range of opinion on specific issues, recognizing that balancing many interests would result in including some items that individual members might not support for their own sake. In other words, rather than seek to identify the relatively few agreements for which there is full, unqualified consensus, we attempted to identify a core set of connected agreements that were needed to create a critical mass of support, which we believe is critical to working effectively with each other and the Forest Service during implementation. Like the Forest Plan itself, many pieces of our recommendations are connected to each other and inseparable from the whole, and there may be portions where members' support is conditional upon other related agreements moving forward together.

According to the Partnership's charter: "Consensus is defined as a decision that all members can live with. Participants may support an idea fully, partially, or not at all." (Charter, Sec 5 page 7). Dissents, abstentions, and qualified positions have been recorded separately and presented below.

Chapter 1 of this document reports Partnership agreements that have been approved by delegates and, as applicable, by their parent organizations. These proposals relate to Forest-Wide components, Management Area components, and Geographic Area components, and Management Strategies. In addition, many of the proposals in Chapter 1 are spatial; they would shift acres from one Management Area to another.

Chapter 2 contains additional proposals that were supported by delegates in concept, but due to time constraints have not been reviewed by their parent organizations. We anticipate a continuing dialogue with the Forest Service Planning Team as our input is incorporated to the planning process.

Chapter 3 (NEPA alternatives) proposes three separate approaches for moving forward together in the planning process, with related agreements needed to make those win/win approaches work. We recognized that one of these approaches (the "blended" approach) would require considerable fine-tuning of Management Area ("MA") boundaries within Geographic Areas based on the addition of an Ecological Restoration Management Area. This was consistent with the painstaking work of the Partnership to refine MA boundaries throughout our years' long process. Many of the tentative agreements around spatial proposals in the Partnership, in fact, depended on the existence of an Ecological Restoration MA. As a result, the final spatial proposals in Chapter 1 correspond best to the "blended" approach in the Alternatives Proposal.

I. Significant Issues for which there are dissenting opinions, abstentions, or qualified support:

A. Ecological Restoration MA

National Wild Turkey Federation (“NWTF”) supports Ecological Restoration but trusts the Forest Service to decide whether the current structure and organization of existing Management Areas can address concerns that are reflected in the proposed Ecological Restoration MA. Granular ecozone objectives can be created forest wide and within Geographic Areas to address compositional and structural restoration needs at both the coarse and fine scales, while also protecting sensitive places and contexts. Such objectives could satisfy Natural Range of Variation (“NRV”)-based goals, and direct project implementers toward projects that achieve specific, ecologically sound forest needs. This requires standards and guidelines to address other stakeholder concerns, but will not require the Forest Service to move to analyze an entirely new Management Area paradigm. The Alternatives proposal, which NWTF participated in developing, accommodates this granular approach, but NWTF does not want to further set back progress and plan implementation at this late stage by changing the plan structure with a new MA unless the Forest Service decides that the advantages are worth the change. A related way forward has also been proposed--namely, adjusting the Interface MA to absorb Ecological Restoration guidelines, which will speak to recreation and conservation concerns in those areas.

North Carolina Wildlife Federation (“NCWF”) supports the goals of ecological restoration reflected in the Alternatives proposal, including a restoration “menu,” but we would like that menu to also include restoration objectives for many species in decline, or a clear analysis of where and how the listed objectives will provide habitats for all those species.

B. Recommendation of specific areas for Backcountry or Special Interest Area

NWTF is not yet prepared to support all the backcountry recommendations made by the Partnership. Any spatial allocations for any NEPA alternative must be able to accommodate the upper end of active management needed to provide wildlife habitat at the landscape level. As the Forest Service incorporates the input from the Partnership proposal, we ask that enough land be open to all tools to meet habitat needs at both the landscape and local scales.

NCWF is not yet prepared to support all the backcountry recommendations made by the Partnership. Any spatial allocations for any NEPA alternative must be able to accommodate the upper end of active management needed to provide wildlife habitat at the landscape level. As the Forest Service incorporates the input from the Partnership proposal, we ask that enough land be open to all tools to meet habitat needs at both the landscape and local scales.

Graham County supports the spatial recommendations for the lands within the County's borders, and encourages other jurisdictions to follow a similar approach to working with other groups and building support for economic growth.

C. Wilderness Designation

NWTF is open to wilderness designations as part of a plan that meets all stakeholders' needs, but the plan should be supported at all levels, including the local level. At this time, wilderness designation is not tenable without clear, sustained progress toward meeting management needs. We appreciate the broad willingness of other Partnership members to support management increases *before* wilderness moves forward, and to act as ambassadors to their communities for scientifically justified ecological restoration in a working forest. The significance of this progress cannot be overstated, and we therefore support the idea behind the stretch goals in Appendix D. It is NWTF's position that support for critically needed habitat creation cannot be dependent on support for wilderness designation, and we are not prepared to support the tiered objective for wilderness without an understanding of the management levels that should be met at landscape and local levels before support for wilderness is sought.

NCWF supports an appropriate level of new designations during the planning cycle. We also appreciate the enthusiasm for wild places that many Partnership members bring to the table. Our members also enjoy hunting, fishing, and other wildlife-related activities in the special places proposed by the Partnership for wilderness recommendation. At this time, we are not prepared to support the wilderness stretch goals because we have not agreed on the "triggers" that would set the pace toward recommending additional areas for wilderness. We look forward to working with our partners and the Forest Service to develop these triggers.

Graham County supports the specific proposals for areas within its borders, as well as other areas where local jurisdictions do not oppose Partnership proposals, but otherwise abstains.

D. Active Management Objectives

The Wilderness Society ("TWS") has some reservations about the active management stretch goals for early successional habitat and woodlands. We helped to develop these stretch goals, but we want to be clear that our support for the upper limits of management are contingent on spatial proposals that leave room for meeting NRV for old growth in all ecozones and protect rare and exemplary communities, as well as stretch goals for wilderness. We are committed to working with our partners to reach these goals, but we also recognize that inappropriate spatial allocations could make it difficult to do so.

LIST OF MEMBERS AND AFFILIATES

I. Member Organizations:

- Access Fund
- American Whitewater
- Back Country Horsemen of America/ North Carolina
- Carolina Land & Lakes Resource Conservation & Development Council
- Carolina Mountain Club
- Defenders of Wildlife
- Eastern Band of the Cherokee Indians
- Evergreen Packaging
- Graham County, NC
- Hiwassee River Watershed Coalition
- International Mountain Bicycling Association
- Mountain Area Gem & Mineral Association
- MountainTrue
- National Wild Turkey Federation
- North Carolina High Peaks Association
- North Carolina Horse Council
- North Carolina Youth Camp Association
- North Carolina Wildlife Federation
- Root Cause
- Southern Appalachian Mineral Society
- Southern Appalachian Wilderness Stewards
- Southern Off-Road Bicycle Association
- The Nature Conservancy
- The Wilderness Society
- Trout Unlimited
- Wild South

II. Affiliate Organizations

- Chattooga Conservancy
- Ecological Services & Markets
- High Country Hikers
- Highlands Cashiers Land Trust
- North Carolina Audubon
- Sierra Club
- Southern Environmental Law Center

CHAPTER 1- CONSENSUS PROPOSALS

I. Forest Wide Desired Conditions, Objectives, Guidelines and Standards (“DOGS”)

A. Terrestrial Ecozones

- Desired Condition: Suggested change - “Maintain sufficient forest in core unfragmented blocks where natural processes dominate *across all ecozones and elevations to assure movement toward NRV of old growth as well as other ecological conditions expected under natural processes and natural disturbance. This will also contribute to realizing other ecozone desired conditions, will improve forest structure, related health and resiliency, and habitat diversity.*” *Unfragmented blocks of forest will contribute to ecosystem function and resiliency by providing a protected reserve of protected ecosystems.*
- Objectives: **CHANGE** to Old Growth Objective: 3. (add) “Designate forest that can mature to old growth conditions” to “assure that” at least 43,600 to 56,300 acres of additional forest per decade “transitions to” **old growth conditions** across all ecozones and elevations to improve forest structure, related health and resiliency, and habitat diversity for old growth-associated plant and animal communities.

B. Threatened and Endangered Species and/or Species of Conservation Concern (under Management Approaches)

- Add two new approaches related to peregrine falcons, and cliff-area plans and plant communities:
- Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure orders on rock faces, and collaboration with the climbing and recreation community.
- Maintain the integrity and resiliency of rare rock outcrop plant communities through site specific management, user group collaboration, stewardship and education.

C. Veg Management

- Recommend smoothing out harvest levels from year to year at the mid scale.

D. Recreation

- Trails: Desired Conditions - Trail heads are well maintained (add) “and appropriately designed to meet the needs of the designated user(s) of the trails they serve.”
- Recognize and support a “Recreation Users Council” (RUC) made up of representatives of the various user and/or stewardship groups (including local community representatives) to monitor and mitigate and resolve any user conflicts if they arise. RUC would assist the Forest Service in:

- Education and interaction with the public to promote responsible, safe, and sustainable public use practices.
 - Assist in Social media and field interpretation to educate Forest users on management activities supporting a healthy forest ecosystem.
 - Work with and help coordinate trail volunteers to build and maintain a sustainable multi use trail system
 - Help the Forest Service in communicating needs and objectives to the public and involved organizations.
- Recreation Settings: Opportunities -Standards - regarding fixed anchors:
 - Recommend adding guidance language regarding climbing fixed anchors. The Wilderness related language could also be incorporated into the Wilderness management section of the plan.
(New Language) Definition - Include the following climbing fixed anchor definition in appropriate Appendix or definition section of the Plan: Climbing fixed anchors are defined as climbing equipment (e.g., bolts, pitons or slings) left in place to facilitate ascent or descent of technical terrain (USDA Forest Service, 1999 i). *Federal Register, Vol. 64, No 209, Department of Agriculture, 36 CFR Chapter II, Forest Service, Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness, at: <http://www.gpo.gov/fdsys/pkg/FR-1999-10-29/pdf/99-28219.pdf>
 - *(Current) Non-Wilderness Management Areas* - Use, placement and replacement of fixed anchors are essential for climbing, climbing safety and resource management.
(New language) Non-Wilderness Management Areas: Fixed anchors are essential for climbing, and climbers may use, place and replace fixed anchors. Fixed anchors for climbing can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. Fixed anchor hardware should be climbing-specific and comply with modern, currently accepted standards. Fixed anchors should be camouflaged to match the surrounding environment.
 - *(Current Language) Wilderness* - Use, placement and replacement of fixed anchors are essential for climbing, climbing safety, and resource management.
(New Language) Wilderness: Fixed anchors are essential for climbing, and climbers may use, place and replace fixed anchors. Fixed anchors for climbing can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. In Wilderness, climbers should use fixed anchors as a last resort, where removable anchor placements are not viable. Motorized drills are prohibited for placement of new fixed anchors in Wilderness. Fixed anchors should be camouflaged to match the surrounding environment.
- *Propose to add to Trails>Management Approaches: Use of Erosion Control/Mitigation for Non-System Trail Management*
 User-created access routes that are not part of the Forest's designated trail system (social trails and other overland travel routes) are critical to providing recreational access to dispersed recreation sites like climbing areas, scenic overlooks, boating access,

waterfalls, and access for hunters and anglers. They also pose a management and stewardship need. We recommend that the Forest Service have the option of utilizing erosion control/mitigation activities to sustainably manage these non-system access routes. “Erosion Control/Mitigation” could be added to the Recreation: Trails section of the plan under a Management Approach, and/or as an approach in the Trails section for Forestwide Objectives.

- Background: There are recreational resources, sites and uses not serviced by designated sites, trails or other Forest transportation systems (for example, scenic overlooks, waterfalls, boating put-ins and takeouts, climbing areas, fisherman's access paths along a river). These sites and uses may have impacts which need additional management or mitigation. Designation or closure are always available as possible management actions, however they are not always feasible, necessary or desirable solutions. Erosion control and other mitigation strategies are another available approach, proven here in Nantahala-Pisgah and other National Forests across the country. The example of successful and completed partner projects between the Forest and Trout Unlimited on work along Davidson River is an ideal model and precedent for how the Forest may authorize erosion control work to mitigate impacts and improve sustainability of rec use and access outside designated sites, parking spots, roads, trails, etc. A new recommended guideline in the plan would enhance resource protection, sustainability and rec management and access. To be clear, this is not support for building social trails, unsustainable social trails or impacts, or unauthorized trail work.
Our recommendation was for this to be in GA goals, and as a general management guideline under Recreation or Trails or another appropriate in a different section of the plan.
- Other Forest examples where erosion control/mitigation projects have been authorized:
 - Bighorn Nat Forest in WY
 - Coronado NF's, AZ-Cochise Stronghold
 - Coronado NF, at the Mt. Lemmon area, Santa Catalina District
 - Arapaho-Roosevelt, CO
 - El Dorado, CA
 - Cache-Uinta, UT
 - Manti La Sal, UT
 - And on Nantahala-Pisgah NF, Pisgah District, along Davidson River!
- Goals: Opportunities to partner with others:
Remove and replace b) to be consistent with similar need in Eastern Escarpment
(d) Work with recreation groups to maintain the integrity and resiliency of rare plant communities through site specific management, stewardship and education.

- Ensure that Byway Management Areas are managed for recreational experiences and as gateways of access to non motorized outdoor recreation, in addition to vehicle-based sightseeing.

E. Cultural Resources

- Desired Condition: Where existing National Forest Service roads parallel or provide access to historic Cherokee trails, such as the Trail of Tears, the Forest Service should maintain appropriate access. Specifically, but not exclusively, this includes the road at the western point of Lake Nantahala near Ft. Scott.

F. Transportation and Forest Access

- **NEW Objective:** Decommission primitive roads from IRAs, subject to existing rights (e.g., maintaining Hendersonville reservoir infrastructure in N Mills), but where possible to maintain or enhance connectivity, consider converting to trails.

See Maps of Primitive Roads within IRAs:

- Nantahala NF:
https://www.dropbox.com/s/7ss7bolgk9752hz/Roads_IRAs_NantahalaNF_20170913.pdf?dl=0
- Pisgah NF;
https://www.dropbox.com/s/wlz44z4vsf8p0c5/Roads_IRAs_PisgahNF_20170913.pdf?dl=0
- Pisgah NF - Pisgah District:
https://www.dropbox.com/s/g0z7rx46363gebh/Roads_IRAs_PisgahNFPisgahDistrict_20170913.pdf?dl=0

- **NEW Standard:** No new linear ROWs in TNC core forests.

II. Management Areas - Special Interest Areas

Recreation is listed as a potential defining characteristic for SIAs: unique attributes may be recreational, should remain persistent over time, and can benefit from specific management direction to maintain the special attributes of the resources in question. However, despite the available recreational criteria, we noted that few Special Interest Areas (MA-5) utilize recreation as a defining unique attribute. In fact in the current inventory only two SIAs are designated for unique recreational attributes, despite significant, longstanding recreational use within a majority of the listed SIAs. Linville Gorge, Looking Glass, and Whiteside Mountain--three of the Forest's most significant and highly visited recreational sites--are just three outstanding examples where

recreation should be recognized as one of the unique attributes that warrants their SIA status.

In recognition of their unique recreational attributes, including rock and ice climbing, we recommend Recreation be listed in addition to the other qualifying criteria for the SIAs listed below. Climbing at these areas has remained persistent over time and could benefit from specific management direction to maintain the special attributes of the climbing resource.

- Black Mountains
- Craggy Mountains/Big Ivy
- Linville Gorge
- Bonas Defeat Gorge
- Cullasaja Gorge
- Ellicott Rock-Chattooga River Gorge
- Scaly Mountain and Catstairs
- Whiteside Mountain
- Whitewater Falls
- Dismal Falls
- Fork Ridge/Mount Hardy
- John Rock
- Black Rock Mtn/Granite City
- Looking Glass Rock
- Linville Dolomite
- Fodderstacks
- Upper Santeelah

Including recreation in these areas' unique attributes is important and necessary to more accurately account for the unique characteristics which make these areas special. Doing so will memorialize needed management plan revisions that can substantiate the continued maintenance of valuable recreation and climbing opportunities.

III. Collaboration Language Proposal

The Partnership requests that collaboration be included more explicitly in components throughout the plan. More specifically we would like to see language such as the excerpts below incorporated into desired conditions, objectives, goals, vision statement, etc. (We have bolded language that we particularly like.)

- Vision Statement (Shoshone NF example): **Forest Service employees provide high quality customer service in a management environment characterized by collaboration, communication, and cooperation. The Nantahala-Pisgah is a model for successful collaboration and partnerships—people actively participate in caring for the land and maintaining the long-term sustainability of the Nantahala-Pisgah resources.**
- Goals and Desired Conditions (Forest-wide Chugach example): Multiple use and enjoyment opportunities within the national forest **result from collaborative**

engagement between the Forest Service and others. Community participation and citizen engagement is a common occurrence, resulting in long lasting partnerships. Relationships with new entities are established in a manner that attracts non-traditional users and strengthens the connections between surrounding communities and the national forest.

- Desired Conditions (Francis Marion example): **Recreation opportunities are enhanced to be more accessible to persons with disabilities and inclusive of a culturally diverse population. Collaborative efforts help guide development of program priorities, promote a connection to place, and foster a sense of stewardship. Community outreach efforts and realignment of recreational offerings lead to an involved citizen population that, over time, is more representative of the communities the national forest serves.**
- Cooperation with Local Partners (Coronado example): The Nantahala-Pisgah National Forest has **ongoing collaborative relationships with communities and groups with land management interests.** Members of local groups have participated in the plan revision process from its inception, and **the forest will continue this collaborative effort in the future to implement monitoring and other common goals.** Forest personnel participate in the scheduled meetings of partner groups, their events, and other ongoing partner activities. Coordinating with these groups promotes and develops consistency among resource plans and integrates common land management goals and strategies. **The following are examples of participating partner groups.**
- Adaptive Management (Rio Grande): To be more responsive to necessary changes in forest plan content, Nantahala-Pisgah National Forest staff will annually post proposed changes and the rationale for the changes, which could include annual monitoring results, on the Forest website. **In conjunction with release of the changes, a stakeholder meeting would be held to discuss the changes proposed in detail followed by a [30 day] comment period.** Upon receiving and reviewing all comments, the responsible official would determine the proper authority to be used in making necessary changes to the forest plan content. The entire process would be open and transparent. To be clear, the Partnership is supportive of plan components accommodating adaptive management and stakeholder involvement, without necessarily requiring a plan amendment.

IV. Geographic Area Specific Proposals

A. Pisgah Ledge

a) DOGS

- Manage Art Loeb Trail corridor consistent with the trail's designation language.
- Recognize need for higher level of recreational management on area of Pisgah District centered around Hwy 276 corridor including portions of Art Loeb Trail, Butter Gap and Cove Creek trails, Black Mountain, Thrift Cove, Sycamore Cove trails, and areas near the Blue Ridge Parkway. Focus on protection and management of this area's diverse recreational activities and sites. Other uses and management

activity, such as restoration or timber harvest, should fully consider the high recreational value of this specific area.

- Recommended changes to GA Description and Goals : Add language and a new sentence that describes trails, trail use and climbing: “The region is defined by mountain peaks *and cliff faces that give way* to narrow valleys with striking rivers and waterfalls. *The mountainous landscape provides many ideal opportunities for hiking, biking, horseback riding, camping and climbing.*”
- Goals: Enhancing and restoring resiliency
Edit to d): “*Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure orders on rock faces, and collaboration with the climbing and recreation community.*” Add “and other species” before “through monitoring”
- Goals: Connecting people to the land:
Add new goal to emphasize recreational management focus:
“*Respond to increased demand for recreational resources for mountain biking, climbing, paddling, hunting, fishing, hiking and, horseback riding.*”
Add new goal related to the need to address erosion and mitigate impacts to recreational resources that are not part of the Forest’s designated sites or trails.
“*Maintain and restore access and sustainability for recreational resources that are not serviced stewardship and education.*”

b) MA Map Adjustments

- See Map:
https://www.dropbox.com/s/bvbse6envdyxodd/NP_Alt201706_PisgahLedge_NSlope_GA_20170913.pdf?dl=0
 1. Change *Daniel Ridge* Matrix/Interface within Wilderness Inventory area to Backcountry/Ecological Restoration
 2. Change *Cedar Rock* Matrix/Interface within Wilderness Inventory area to Backcountry/Ecological Restoration
 3. Change *South Mills River* Matrix/Interface within Wilderness Inventory area to Backcountry/Ecological Restoration
 4. Change *Laurel Mountain* Matrix/Interface within Wilderness Inventory area to Backcountry/Ecological Restoration

B. Nantahala Mountains

a) DOGS

- Recommended changes to GA Description and Goals :
The goal of prioritizing logging in rich cove forest should be removed. [Enhancing & Restoring Resiliency, 2nd paragraph, delete “rich cove”]

b) MA Map Adjustments

- See Map:
https://www.dropbox.com/s/ij1q5gum0p3hpsn/NP_Alt201706_NantahalaMtns_GA_20170913.pdf?dl=0
 1. Siler Bald: Core of backcountry around AT corridor and NC Natural Areas/OG; Ecological Restoration outside core.
 2. Fires Creek: Fires Creek/Tusquitee Bald WIA in Change Backcountry and Matrix Interface within Wilderness Inventory to Wilderness recommendation, Backcountry; Ecological Restoration per map:
https://www.dropbox.com/s/ruauiwsfgv7l43n/FiresCr_TWSProposal_20170724a.pdf?dl=0
 3. Tellico Bald: Core of backcountry around AT corridor and NC Natural Areas/OG; Ecological Restoration outside core.
 4. Wesser Bald Matrix/Interface within Wilderness Inventory area to Backcountry/Ecological Restoration
 5. Southern Nantahala Wilderness Extensions within Wilderness Inventory areas to Wilderness recommendations including Chunky Gal. Some ecological restoration along existing roads.
 6. Botetler area within Wilderness Inventory area in matrix/interface change to backcountry. Some ecological restoration along existing roads.
 7. Piercy Mountain Range within Wilderness Inventory area Matrix/Interface within Wilderness Inventory area to Backcountry/Ecological Restoration

C. Unicoi Mountains

a) DOGS for the Unicoi Mountains should accommodate and make progress toward the following:

- Recommend that the following inventory areas not move forward as wilderness: eastern portion of Tapoco extension (the part in the lakes GA), Lower Snowbird, Cheoah Bald, Yellow Creek Mountains, Joyce Kilmer southern extensions.
- Recommend that the following areas be considered appropriate for timber harvest for ecological restoration, maintenance of existing roads, and protection of rare species habitat, but not timber production or new permanent roads: Upper Santeetlah, Joyce Kilmer southern extensions, Lower Snowbird, and State Natural Heritage Area at the top of Meetinghouse.
- Recommend smoothing out harvest levels from year to year at the mid scale.
- Recommend improving and adding recreational access to reservoirs. Recommend improving and restoring trail accessibility, including current system trails, Joanna bald trail as well as Meetinghouse trailhead.
- Recommend reviewing existing trails to assess whether appropriate for multi use.
- Recommend development of more multi use trail opportunities to increase visitation.

- Recommend clarifying that the recreational resources in these GAs (Unicoi and Fontana) are underutilized and therefore small-scale commercial outfitter use is not likely to have impacts beyond normal public use, and encourage streamlining of permits.
- Recommend prioritizing areas with timber and wildlife habitat emphasis for restoring public access on existing roads.

b) Map Adjustments

1. Snowbird WSA from WSA to provisional wilderness recommendation. Recommendation is contingent upon reaching benchmarks set for this GA.
2. Lower Snowbird area mapped as Matrix/Interface in USFS proposal to ecological restoration.
3. Joyce Kilmer Wilderness Extensions on north side to provisional wilderness recommendation. Recommendation is contingent upon reaching benchmarks set for this GA.
4. Upper Santeetlah Watershed (including southern Joyce Kilmer Wilderness Extensions) mapped as Matrix/Interface in USFS proposal to SIA/Ecological Restoration
5. Yellow Creek Mountains area mapped as Matrix/Interface in USFS proposal to SIA/Ecological Restoration
6. Ash Cove area within Wilderness Inventory area mapped as Matrix/Interface in USFS proposal to SIA/Ecological Restoration

c) Address gathering of traditional and/or medicinal plants per future feedback and ongoing discussions among interested parties.

D. Eastern Escarpment

a) DOGS

- Take advantage of current rec assets that can be resurrected to increase recreational opportunities, including Boone Fork - Opportunities to partner with others, propose adding d) Partner with equestrians and mountain bike organizations to restore the facilities, example Boone Fork that will support access to the Forest.
- Geographic Area Goals: Suggest adding this piece under “Opportunities to Partner with Others”. Increase partnerships to conduct more ecological controlled burning across the GA. Utilize Fire Learning Network to enhance interpretation opportunities for a wide variety of visitors to the area.
- Recommend other changes to GA Description, goals, etc.
 - Description of the area section. Change to: The region contains distinct projecting rocks and cliffs and sudden elevation changes - the most dramatic along the perimeter of Linville Gorge - *which offer highly valued scenery and recreational opportunities such as hiking, backpacking, and climbing.*

- Goals, Connecting people to the land - Add new goals: (1) *Maintain and enhance access to the region's outstanding recreational opportunities for climbing, fishing, hiking, hunting, mountain biking, horseback riding, scenic viewing, rockhounding, wildlife viewing, whitewater boating and sustainable other recreation activities.* (2) *Improve monitoring and inventory of recreational use sites*
- Change and add to language on peregrine falcon goal: *Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure orders on rock faces, and collaboration with the climbing and recreation community.*
- Places to be managed in consideration of their unique features: Remove mention of hiking and climbing from (c) and (d) so they read as below:
(c) Emphasize treatment of non-native invasive species in Linville Gorge. (d) Reduce or eliminate impacts to T&E species such as Heller's Blazing Star, mountain golden heather, and gnome lichens at Linville Gorge. Alternatively, given the specificity of (c) and (d), consider removing from GA document and placing them in appropriate management chapter guidelines, if not already there. More general language, such as below, could also be a replacement for use in the GA document: *Maintain the integrity and resiliency of rare rock outcrop plant communities through site specific management, user group collaboration, stewardship and education.*
- Opportunities to partner with others: Add to (b) to include Wilderness recreation: Partner with wilderness *and outdoor recreation* advocacy groups to assist in managing Linville Gorge Wilderness and the geographic area's wilderness study areas and in educating visitors about wilderness ethics and low impact camping *and climbing techniques.*
- Add additional goal: *Work with recreation groups to maintain the integrity and resiliency of rare plant communities through site specific management, stewardship and education.*

E. Harper Creek and Lost Cove:

a) Management Recommendation:

- We ask that the Forest Service reconsider finding the Gragg Prong, Lost Cove Creek, North Harper Creek, and Harper Creek as eligible for Wild and Scenic designation for their outstanding scenic and recreational values, in recognition that Wild and Scenic Corridors could one day serve as protected corridors that support multi-use trail use and connectivity.

b) MA Map Adjustments

- See Map:

https://www.dropbox.com/s/jb5dobiwayvr/NP_Alt201706_EasternEscarpment_GA_20170913.pdf?dl=0

1. Change Interface/Matrix in Wilson Creek, Dobson Knob, Sugar Knob to Backcountry/Ecological Restoration.
2. Change Steels Creek area to Backcountry around inaccessible NC Natural Area/OG. Steele Creek area mapped as Matrix/Interface in USFS proposal to Ecological Restoration.
3. Western Linville Extension in Wilderness Inventory mapped in USFS proposal as Matrix/Interface to Ecological Restoration.

F. Black Mountains

a) DOGS

- Under Goals - Connecting People to the Land - Replace 'respond to' with 'Maintain and enhance access to'; and include horseback riding and other rec activities for more inclusive statement: *Maintain and enhance access to mountain biking, climbing, hunting, fishing, horseback riding, hiking, boating and other sustainable recreational experiences* .
- Rich cove ecozone wording : At mid elevations accessible by existing roads, emphasize restoration of structural and compositional diversity within rich cove ecozones that
 - Support the development of old growth age and characteristics, including a mosaic of different sized openings to mimic tree-fall natural gap disturbance that would support habitat for many salamander species and bats.
 - And by daylighting road edges to benefit ruffed grouse and American woodcock.
- Target Victor Fields for deer and grouse management: Victor Fields is an area steeped in hunting tradition and represents a unique opportunity in the Black Mountains to manage and enhance a large opening at a relatively high elevation. Efforts should be made to manage the fields and their edges to improve habitat for deer, grouse, and chestnut sided warbler. This should be reflected in the Geographic Area goals.
- Wild and Scenic Rivers: We support the findings of the USFS May 2017 Wild and Scenic River Summary Evaluations that moved forward the South Fork of the Toe River in this GA as newly eligible for Wild and Scenic designation, except we feel that Rock Creek should be reconsidered and found eligible.
- Recommended changes to GA description, goals, other sections
Description of the area: Connecting people to the land (3rd paragraph, last sentence)
“...and rock climbing is popular at Snake Den Cliff *and Corner Rock*.”
- Goals: Places to be managed in consideration of their unique features
 - Add additional focus under i. , e., under '(a) Manage the Big Ivy Area...': *Improving recreational management and stewardship*
 - Add the following edit to ii.: *Maintain and enhance dispersed recreation opportunities*

b) MA Map Adjustments

- We support the USFS 2017 Building Block MA boundaries in the Woods Mountain Area and encourage the FS to look at this area for its potential to contribute to their goal of increasing opportunities for equestrian and mountain bike access.
- See Map:
https://www.dropbox.com/s/tfq0qidjywgmib4/NP_Alt201706_BlacksMtn_GA_20170913.pdf?dl=0
 1. Change Black Mtn USFS management Backcountry proposal to Recommended Wilderness, omitting area around Ray Mine and Bowlens Creek and portions of Moody Mtn and recognizing the existing equestrian trail (Buncombe Horse Range). Portions of this trail require relocation to provide protection for the natural conditions while preserving equestrian access.
 2. Recommended Wilderness proposal and SIA adjustment for Big Ivy. The Forest Service should recommend as Wilderness the area that includes the southern lobe centered on the Wilderness Study Area, the Northern Lobe running from Big Butt to Cedar Cliff, and the connector strip that parallels the Parkway above the Laurel Gap Trail. Refer to Big Ivy map:
https://www.dropbox.com/s/t2hcmrh3rd4gwmj/BigIvy_WildernessProposal_20160915.pdf?dl=0
 3. Snowball Mtn in area mapped by USFS as Matrix/Interface change to Special Interest Area/Ecological Restoration.
 4. Coxcombe Mtn in area mapped by USFS as Matrix/Interface change to Special Interest Area/Ecological Restoration.
 5. Change Mackey Mountain area mapped as Backcountry in USFS proposal to Wilderness Recommendation, in recognition of outstanding soundscape.

G. Highland Domes

a) DOGS

- Recommend changes to GA Description and Goals:
 - Description of the area:
 - Many of the cliffs in this GA are much taller than 300'. Recommend replacing with "*cliffs and high granitic domes many hundreds of feet tall.*"
 - Mention of non-water based recreation examples is needed in the landscape overview of first paragraph: "*The steep forested mountains, coves and soaring granite cliffs provide outstanding opportunities for hiking, horseback riding, mountain biking and climbing.*"
 - Make an addition to the non-Forest landmarks list:
Add the 'Laurel Knob Cliff and Climbing Area', owned and managed by Carolina Climbers Coalition, under 'Landmarks within the geographic area that are not managed by the Forest Service' list. Laurel Knob is the tallest unbroken cliff face in the Eastern U.S., an outstanding example of the granitic domes characteristic of

this region, and a significant climbing site managed for the public. It is accessed from the Forest's Panthertown Valley access point.

- Connecting people to the land
 - Goals: Enhancing and restoring resiliency
Add new goal f) to cover peregrine falcon protection; remove from a) under Connecting people to the land: f) *“Continue to support conservation and protection of peregrine falcons through monitoring, seasonal closure orders on rock faces, and collaboration with the climbing and recreation community.”* Add “such as” before peregrine falcon.
 - Add new goal a) *“Maintain and enhance mountain biking, climbing, hunting, hiking, fishing, horseback riding and other recreational resources and experiences.”*
 - Goals: Places within the area that will be managed in consideration of their unique features
Add to first bullet point under Panthertown a) *“Maintain and enhance recreation experiences for visitors engaged in sightseeing, hiking, horseback riding, fishing, climbing and other sustainable recreational activities.”*
 - Goals: Opportunities to partner with others
Change f) to be consistent with similar management goal in Eastern Escarpment and Pisgah Ledge: *(d) Work with recreation groups to maintain the integrity and resiliency of rare plant communities through site specific management, stewardship and education.*
- Wild and Scenic: We support the findings of the USFS May 2017 Wild and Scenic River Summary Evaluations that moved forward 5 fine streams as newly eligible for Wild and Scenic designation, except we feel that the following additional streams should be reconsidered and found eligible: North Fork French Broad River (solely on USFS land, on the reach between Macedonia Church Road and Highway 64), Panthertown, Greenland creek, and East and West fork of Overflow as WS River eligibility

b) MA Map Adjustments

- See Map:
https://www.dropbox.com/s/qxt3kfo7vmcb6mz/NP_Alt201706_Highland%20Domes_GA_20170913.pdf?dl=0
 1. Change Overflow WSA in USFS proposal to Wilderness recommendation, leaving out buffer along FS road 79. (Hugh; TWS; Nicole & Taylor; Chattooga Conservancy) The Overflow Creek area is contiguous with several core areas in the Chattahoochee-Oconee National Forest (CONF) that each possess significant wilderness characteristics, such as a 2,640 acre landmass designated as a “Natural Area,” meaning that it is largely “wild” and has few open roads. Another such

landmass in the CONF is a 1,000 acre portion of the Chattooga Wild and Scenic River Corridor, which contains the West Fork of the Chattooga and the remote “three forks” area.

2. Ellicott Rock Extension in USFS proposal to Wilderness recommendation, leaving out interior road.
3. Area north of Ellicott Rock Extension surrounding Ammons Branch and Holly Branch (also contiguous with Chattooga W&S River Corridor) in USFS proposal as Interface to Backcountry.
4. Terrapin Mtn in USFS proposal to Backcountry.
5. Brushy Mountain area south to Ellicott Rock Wilderness Area in USFS proposal as Backcountry.
6. Panthertown Valley and area around Dismal Falls mapped in Matrix/Interface in USFS proposal to Backcountry

H. Fontana

a) DOGS

- Propose changes in language, in Connecting people to the Land :
 - Currently: The Tsali Recreation Area on Fontana Lake provides access for mountain biking which draws national recognition, as well as and horseback riding, boating, and developed camping.
 - *Change to: The Tsali Recreation Area on Fontana Lake provides access for mountain biking and horseback riding which draws national recognition, as well as boating, and developed camping.*
- The Fontana GA affords numerous opportunities to enhance recreation and consequently take some of the pressure off of other areas that are at risk of being over utilized. We ask that the Forest Service create DOGS that support the following measures:
 - Increased camping opportunities along Lake Santeetlah. Areas for consideration include new opportunities on the Long Hungry Peninsula and increased opportunities on Avey Branch.
 - Continued development of the remaining 12 trail miles proposed around Lake Santeetlah to increase access for horseback riding, bicycling, and hiking enthusiasts via an easy to moderate trail. Improved signage for this area to increase use.
 - Support the USFS in maintaining the existing infrastructure. This is including but not limited to existing restrooms, campsites and trails.
 - Designation of waterfront on both lakes and the Cheoah river as Recreation Priority areas
 - Re-open Meeting House Mountain Road and revitalize multi-use trails the road leads up to.
 - The trail that runs along the northern border of Snowbird be maintained for multi-use and not excluded from the opportunity to be a part of recreation events such as foot races, triathlons, etc. regardless of MA designation.

- Recommend improving and adding recreational access to reservoirs.
- The Cheoah River: In the *Connecting People to the Land* portion of the USFS doc on the Fontana GA, change c) to read: “Support recreation opportunities and access to the Cheoah River, including full and ongoing consideration of requesting additional flow releases”.

b) MA Map Adjustments

- See Map:
https://www.dropbox.com/s/t9zopp8gtvr9tfm/NP_Alt201706_GrahamCounty20170905.pdf?dl=0
 1. Change Yellow Creek Mtn area within Matrix/Interface in USFS proposal to Ecological Restoration.

I. Hiwassee

a) MA Map Adjustments:

- See map:
https://www.dropbox.com/s/97nti28i4yez9a5/NP_Alt201706_UnicoiMtn_HiwasseeGA_20170913.pdf?dl=0
 1. Unicoi Mountain area within Wilderness Inventory in USFS proposal as Matrix/Interface to Wilderness recommendation, in recognition of contiguous Wilderness in TN.

J. Bald Mountains

a) DOGS

- Edit GA language to add greater recognition of the unique winter-based recreation opportunities needed in this area, including ice climbing, and related winter camping, cross country ski and snowshoe recreation. Add addition to sentence in second paragraph of Bald Mountains GA Description: A prominent tourist destination since the 19th century, the Roan Highlands remain one of the most visited sites in the region, *and also offer unique winter-based recreation opportunities such as cross-country skiing, snowshoeing, ice climbing and winter camping.*
- GA Goals: Roan Mountain goal should include globally rare grassy balds : *Maintain and restore high quality grassy balds, alder balds, and high elevation rocky summits.*

b) MA Map Adjustments

- See Map:
https://www.dropbox.com/s/vl0v9ey8m0ibst/NP_Alt201706_BaldMtn_GA_20170913.pdf?dl=0
 1. Bluff Mountain within Wilderness Inventory Area in USFS proposal as Matrix/Interface to Backcountry/Ecological Restoration.
 2. Pigeon River Gorge within Wilderness Inventory Area in USFS proposal as Matrix/Interface to Ecological Restoration.
 3. Nolichucky Gorge within Wilderness Inventory Area in USFS proposal as Matrix/Interface to Backcountry/Ecological Restoration.
 4. Bald Mountain Inventory Roadless Area change from Backcountry to recommend for Wilderness designation.

K. Great Balsam

a) DOGS

- Resiliency Goal modification, goal A: Conserve and restore mesic oak (instead of northern hardwoods), high elevation red oak, and spruce fir forests with emphasis on desired conditions within these ecozones.
- Wild and Scenic Rivers We support the findings of the USFS May 2017 Wild and Scenic River Summary Evaluations that moved forward 10 fine streams as newly eligible for Wild and Scenic designation (zero in this GA), except we feel that Tanasee Creek should be reconsidered and found eligible.

b) MA Map Adjustments

- See Map:
https://www.dropbox.com/s/x3agubbx8am4j5l/NP_Alt201706_GreatBalsam_GA_20170913.pdf?dl=0
 1. Alarka Laurel area mapped in USFS management proposal as Matrix/Interface change to SIA/Ecological Restoration

L. North Slope

a) DOGS

- Recommend addition to Resiliency goal A: Restore diverse forest structure and age classes in areas outside of designated wilderness areas to improve forest resilience “and to trend towards the natural range of variability” and to....

b) MA Map Adjustments

- See Map:
https://www.dropbox.com/s/bvbse6envdyxodd/NP_Alt201706_PisgahLedge_NSlope_GA_20170913.pdf?dl=1
- 1. Middle Prong Wilderness Extension within Wilderness Inventory Area in USFS proposal as Backcountry recommend for Wilderness.
- 2. Middle Prong Wilderness Extension within Wilderness Inventory Area in USFS proposal as Matrix/Interface (Lickstone Ridge) change to Backcountry.

CHAPTER 2-PROPOSALS THAT HAVE CONSENSUS BY DELEGATES BUT NOT PARENT ORGANIZATION APPROVAL DUE TO TIME RESTRAINTS

I. Methodology for Spatial Allocations for Specific Agreements (See MA Maps-Ch 1)

A. Old Growth:

1. **NEW:** Allocate and manage areas consistent with the long term desired condition of steadily moving over time toward the predicted NRV of old growth, distributed in a network of large, medium, and small patches that account for natural disturbance with ongoing recruitment and loss of old growth.
2. **NEW:** Core unfragmented blocks or protected ecosystems are planned and managed to accommodate natural disturbances and dynamics to stay on track to allow forest to mature into old growth conditions.
3. **NEW:** Trade offs from other objectives that would preclude reaching old growth and unfragmented forest objectives and desired conditions would be analyzed as plan level and project level tradeoffs.
4. **NEW:** Limited ecological restoration in areas around core unfragmented blocks that are needed to move toward old growth and unfragmented forest desired conditions that has existing access are prioritized for enhancing old growth conditions.

B. Special Interest Areas

NC NHP Natural Areas with top Representational or Collective ratings of 1-3 (Exceptional, Very High, and High) that do not otherwise fall within Backcountry (or wilderness recommendations) incorporate into SIA management or Ecological Restoration (or Special Biological Management Area) management along with any existing old growth or large or medium old growth patches.

II. Management Area DOGS

A. Condition Based Objectives

The Partnership proposes that condition based objectives (such as the one below) be developed for forested ecozones and other resource interests.....

Restore XXXX acres annually of shortleaf pine-oak habitat that is ecologically departed from desired conditions. Maintain existing high quality shortleaf pine-oak forests by annually treating XXXX acres.

Management efforts will prioritize the reduction of shrub-midstory density to favor oak and southern pine regeneration as well as herbaceous growth, including grasses, towards the Natural Range of Variation. Management efforts will also focus on restoring all elements of the native biodiversity. Silvicultural strategies will be site-specific with the overall goal of restoring composition and structure to enhance resilience to current and future stressors, including drought

and pest-disease outbreaks. Thus, shortleaf pine-oak management goals should include creating and maintaining open forest canopy using fire, generally low-severity every 3-5 years, but also incorporating mixed severity where possible, as well as timber stand improvement that mimics natural gap disturbance. Focus management on increasing young forests and opening up middle-aged to reduce stressors and increase resiliency.

III. Geographic Area Specific Proposals

A. Harper Creek and Lost Cove:

a) Management Recommendation:

The Partnership recognizes that Harper Creek and Lost Cove WSAs have strong wilderness character and could meet important wilderness needs, but we also recognize that they can remedy the unmet need for trail mileage and connectivity to satisfy multiple user groups including mountain bikers who are currently banned from this area. We recommend that the Forest Service address this unmet need by providing adequate opportunities in the Eastern Escarpment. If the Forest Service recommends HC/LC as wilderness, we suggest that the recommendation be made provisional, subject to the following milestones: (1) between 15 and 20 additional miles of class 2 or 3 sustainable multi-use trails. (2) network connectivity providing loop options of varying length and commitment levels within the Upper Wilson Creek/Harper Creek/Lost Cove/Sugar Knob complex and (3) a broadly supported plan in place in 3 years to meet these goals and within the next 3 year cycle, at least 2 identified projects will have completed the NEPA process. Any new trail construction would need to be sustainable and accessible for all non-motorized users. The Partnership recognizes their responsibility in the development of a plan for the area and stands ready to work towards that goal.

(Agreed in principal but due to verbiage change at the meeting, BCHA/BCH NC & NCHC need to review)

IV. Appendix E (TO ALTERNATIVES PROPOSAL- CH 2) : Roads and Access

Three related factors make roads and access a difficult issue for the plan revision:

1. The NPNF lacks the funding to maintain the vast majority of its current road system, resulting in chronic and acute harm to aquatic ecosystems;
2. Forest roads are the greatest source of sediment to waters and barriers to aquatic ecosystem connectivity on the NPNF; and
3. Restoring and maintaining access to locally important areas is a high priority for many stakeholders.

Current draft direction for transportation and access in the Matrix (and Interface) MAs includes a Desired Condition to “retain” access, combined with standards to reduce access if needed for a variety of reasons. These components are in tension, and as a result they are not likely to either restore access or protect water quality and aquatic ecosystem connectivity.

MA-level direction: We propose that the Forest Service change Matrix MA direction to “restore and maintain” access based on GA-specific criteria. Backcountry MA direction should emphasize elimination of unneeded roads.

GA-level direction: We also propose that the Forest Service develop specific criteria for each GA. For example, road access in the Fontana Lake GA should emphasize restoring access to shoreline sites to increase recreational opportunities. Road access in the Unicoi Mountains GA should emphasize restoring access for traditional plant harvesting (e.g., ramps) and hunting/fishing.

Forest-Wide direction: Finally, because the plan cannot add access without simultaneously addressing forest-wide failures to protect water quality from road impacts, we propose that the Forest Service add a desired condition to fully maintain the road system to protect water quality, add a forest-wide objective to reduce the maintenance backlog as a proxy for reducing risk to waters and add objectives for replacing culverts that are barriers to aquatic connectivity.

In order to balance the potentially beneficial impacts of roads to some wildlife species against the potentially negative impacts to other species, we propose a management approach that promotes daylighting and seeding of some roads in appropriate ecozones coupled with a guideline that roads should not create barriers for relevant aquatic or terrestrial species.

Together, we believe these components will help guide project decisions to restore locally important roaded access while improving forest-wide protection for aquatic ecosystems.

CHAPTER 3- NEPA ALTERNATIVES & ECOLOGICAL RESTORATION MANAGEMENT AREA

I. Context for new proposal for NEPA Alternatives

Over the past month several work groups have been digging into the toughest issues that we have identified in the Partnership room, specifically how we glue all of these pieces together and get as many of our proposals from orange and pink to green. Several partnership members proposed solutions, but we realized that we couldn't necessarily answer the question of which strategy was the best. As a result, we are proposing that the NEPA process be used to answer the toughest questions for plan revision. This proposal brings together all of the conversations of those work groups, summarized as best we can.

The primary proposal is for NEPA alternatives, which are different strategies we think could all be win/win. Each alternative that we present will require further mapping. The EIS process should answer whether the mapped alternatives provide adequate room for our "stretch goals."

In order to make these alternative strategies work, we have had a number of spin off conversations to discuss stretch goals, road access, and to define ecological restoration. After some very productive conversations, we have recorded our agreements in the appendices to this proposal.

II. Proposal

The Partnership proposes that NEPA alternatives are used to compare different win/win solutions for all interests. For example, some have proposed an emphasis on ecological restoration, while others have proposed more emphasis on backcountry values or creation of shifting mosaics of habitat. We propose that the NEPA alternatives look at different ways of combining these management strategies, and that **each alternative in the plan be designed to minimize conflict and maximize progress towards the desired conditions that reflect each of our values**. Instead of several win/lose alternatives, we propose that the alternatives attempt to compare different stakeholder ideas for win/win solutions.

We realize that this means that none of us will see his or her ideal, 100% perfect alternative analyzed in full detail. But we also recognize that none of us will ever see that personal ideal plan *implemented*, because the Forest Service's job is to balance many uses. We would therefore rather see a set of fully analyzed alternatives, all of which attempt to make the greatest possible

progress from the status quo, and all of which are implementable based on their collaborative support.

Instead of assuming that our various interests are in tension with each other, we propose that the Forest Service show how they can be complementary. We believe we can make progress towards all our many goals by working together, which was the idea that brought us together as stakeholders in the first place. We would like to see the NEPA process reflect that premise.

If our interests were mutually exclusive (if, for example, protecting old growth would always result in less young forest habitat), then it would make sense to include “win/lose” alternatives, such as an alternative with lots of old growth and less young forest, and another alternative with lots of young forest and less old growth. Instead, we propose that each alternative use tiered objectives to show how we can do both, and emphasize recreation and clean water too.

A. Our discussions

As we understand it, the Forest Service has been expecting to come up with a single, evolving plan alternative, and that the NEPA process will look at “bookends” for analysis, each of which will favor some interests over others. A small group of us got together because we were worried that these win/lose alternatives would inevitably move us away from consensus, and drive us towards singular positions.

After talking with the planning team, we realized that the Forest Service understands these potential problems, and that they have been hoping the stakeholders can help to solve them by narrowing the range of disagreement through collaboration. But what happens if the range of general public opinion is still very broad compared to the collaborative group? The full range of disagreement will still need to be reflected in the alternatives, and the bookend alternatives could still be very far apart.

We observed that the use of bookend alternatives is based on theoretical tradeoffs, and on an assumption, that there’s not enough room on the forest for any of our interests to grow unless we take away from another interest(s). However, we do not believe this assumption is true. While it is true that, at some point, increasing levels of backcountry and/or wilderness would interfere with our ability to increase the pace and scale of restoration, and vice versa, we are far below that point now. This reality allows us to make progress towards all our goals without working at odds with our colleagues.

Instead of theoretical tradeoffs based on land allocations, the real tradeoffs we have noticed in Partnership (and Forum) discussions are between:

- predictable flow of young forest habitat/forest products and ecological need
- economic efficiency and distribution of management activities
- restoration at landscape and fine scales
- scheduled/managed succession and restoration/mimicking of natural disturbance processes.

These are critical tradeoffs to analyze, but none of them inherently prevents us from moving incrementally toward many goals at the same time.

B. Our Proposal

First, we propose that extreme win/lose alternatives be eliminated from detailed consideration in the NEPA process. To be clear, we do not believe that either “custodial management” or “no wilderness” alternatives meet the multiple use mandate or the “givens” for the planning process. The “givens” should serve as the screening criteria to determine whether an alternative should be considered in detail.

Second, we propose that the NEPA alternatives examine different ways that management can be sensitive to place-based contexts in the plan. Some areas of the forest have less sensitive contexts--i.e. great opportunity for management but are not crowded with natural values or recreation uses. Other areas are more crowded with countervailing values. This proposal is based on our assumption that prioritizing work in ways that are sensitive to contexts, and therefore are in zones of agreement, will allow for the most progress from the status quo.

We believe that the Partnership has identified several large zones of agreement already. Areas outside the “overlap” between the wildlife alternative and natural area priorities have been broadly supported for their respective management emphases. We propose that these agreements be reflected in all the alternatives that receive detailed consideration.

With respect to the overlap areas, where there is still some potential conflict, we are aware of multiple options for allowing management that is sensitive to context. We have drafted three alternatives to provide concrete examples of how this might work and have included them with this document as Appendix A. In Appendix B we have addressed how the example alternatives meet the NEPA requirements as we understand them.

Third, we also propose that each NEPA alternative use the concept of tiered objectives and adaptive management triggers to ensure that progress is made on multiple goals simultaneously. A base tier of management objectives and wilderness recommendations would be set at a level where we are confident they will both be achievable without interfering with each other, and a

second tier would provide for sustained progress toward management goals for habitat and recreation before additional wilderness recommendations become effective. In other words, wilderness recommendations that create substantial uncertainty about our ability to sustainably meet other management goals would be made provisional, while recommendations that do not create uncertainty would be made in the first tier. This approach is spelled out in Appendix D.

In summary, we are proposing an innovative use of alternative development to achieve a collaborative plan that furthers our dialogue. We hope that you will strongly consider this proposal to support the collaborative process that we have all invested so much time and effort in.

III. Appendix A. Alternatives to be considered.

Below are three proposed alternatives for the NEPA process. The goal with each alternative is to create “win/win” solutions. We expect that each interest involved will see their values reflected in each alternative. In other words, there won’t be a single alternative that is necessarily “best” for recreation interests, sportsmen, environmental groups, or forest products representatives.

While these alternatives utilize different strategies, all have the same goal--making the greatest possible progress from the status quo. Each interest group should weigh the pros and cons of these different landscape strategies. We believe each of these strategies is conceptually workable, but the EIS analysis should provide detailed answers to questions not addressed in this proposal.

A. Alternative A. Ecological restoration on a large landscape - the “granular” approach

This alternative would ensure that we can meet ecological restoration needs wherever we find them, subject to accessibility, and as such would result in broader geographical distribution of habitat diversity. The portion of the landscape open to active management would be the largest, and all of it would be in an Ecological Restoration Management Area. (See Appendix C for a definition of ecological restoration, a menu of potential projects, and a description of this management area.) Stand-level need would determine treatment. The need for balancing age classes at the landscape scale would not drive stand-level prescriptions in this MA; however, ecological restoration would still result in a mix of young and open habitats of various sizes and configurations. Top priorities would be to treat stands with uncharacteristic vegetation and to provide underrepresented conditions by manipulating overrepresented conditions, focusing on conditions that can also provide the greatest benefit for wildlife habitat and local economies. Old growth and state natural areas would be managed, if at all, to enhance or restore the unique contributions to ecological integrity for which they have been identified. Old growth restoration

would be preferentially located where it would provide connectivity or permeability between existing patches or natural areas.

Below is a summary of the pros and cons of this approach:

Wildlife Habitat and Restoration: This alternative would make the most rapid progress toward restoring ecological integrity at the fine and landscape scale and would have the widest geographical distribution and variety of habitat diversity, but it would have a somewhat less predictable flow of large-patch young forest habitat. The “menu” of ecological restoration priorities would emphasize condition-based objectives that will also provide the greatest wildlife habitat benefits (as well as wood products for local economies). The total amount of work would be addressed using tiered objectives (aka “stretch goals”) and adaptive management triggers, as explained in Appendix D.

Recreation: Forest visitors would experience active management of a wide variety of types and intensities distributed across the Forest, but less frequently large stand-replacing cuts. There would be fewer areas where visitors could predictably experience the solace and sanctity of forests lacking recent disturbance (such as backcountry). Scenery impacts would be less noticeable but more broadly distributed. Hunters would have relatively more and more dispersed canopy openings to attract game, but opening sizes would have more variation. Long term, this emphasis would help to restore natural settings in which visitors enjoy a more diverse forest. Interpretation and online mapping could help visitors accept, appreciate, avoid, or take advantage of restoration-related disturbances. Coordination with a Recreation User Council and standards/guidelines for recreation impacts could further protect and enhance recreation experience. Lower value timber receipts combined with greater road maintenance costs could result in lower overall receipts available for other needs such as recreation infrastructure and facilities.

NAPs and designations: Areas identified as NAPs because they contain state natural heritage areas or existing old growth would be addressed through forest-wide components allowing management to maintain or enhance their current ecological trajectory, but not to “reset” areas to an earlier seral stage in order to meet landscape-level objectives. Other areas identified as NAPs (wilderness inventory areas outside of SNHAs and old growth) would be mapped into MAs other than Matrix. Specifically, inaccessible areas with low restoration need or opportunity would be mapped as Backcountry, but roaded or lightly roaded areas would be mapped into the Ecological Restoration MA. Overall, this alternative would have less backcountry than the others; however, management in the NAPs would be context sensitive. Recommendations for wilderness designation would be addressed through the use of tiered objectives and adaptive management triggers, as shown in Appendix D.

Forest Products: This alternative would provide for sustainable growth of the local forest products industry. Local purchasers would be seen as partners to other stakeholders, strengthening local support for a working forest over time. Projects would not be developed for timber production, but the menu of restoration objectives would provide diverse opportunities to plan projects that would make progress toward restoration and wildlife goals while also providing the products needed by purchasers. Smaller or more widely distributed units would likely favor small, local purchasers. A likely shift in emphasis toward thinning or other intermediate harvest techniques would be offset by the lack of limitations on unit size (i.e., no 40-acre cap on harvest), to ensure commercial viability. Because projects would be focused on context-sensitive restoration goals, locally important values would be less likely to create project-level controversy or necessitate project modification.

Access: Because management would be occurring on the largest portion of the landscape, this alternative would require the most extensive road system. Less frequent entry using individual roads might also increase maintenance needs between entries. Additional partner investments would be needed to keep these roads open, but many could be placed into storage if not expected to be open to the public, freeing up funds to maintain open roads. At the project level, the Forest Service would restore and maintain access based on GA-specific factors while simultaneously making progress to protect aquatic ecosystems, as described in Appendix E.

The charts below provide summary information that may be helpful.

Alternative A	Land Allocated to Matrix	To Ecological Restoration	To Backcountry
Granular	None	Largest	Smallest

Alternative A	Portion of landscape open to all tools	Flow of large patch ESH	Intensity of stand-level treatment	Sunlight on the ground / Timber volume	Total number of acres treated
Granular	Largest	Least predictable	Mixed, but lower on average	Same or nearly same in all alternatives	Highest

B. Alternative B. Backcountry and balanced age classes - the “spatial” approach

This alternative would shift areas with high biodiversity and sensitive contexts, including areas with high relative proportions of old growth and state natural areas, from matrix (and interface) into backcountry. This would result in some accessible areas being placed into backcountry, but the backcountry MA would allow the use of existing roads for ecological restoration to restore natural processes. In the matrix MA, plan components would provide for restoration *and* balancing of age classes. The vegetation projects being implemented would emphasize regeneration harvests and high value hardwoods rather than restoring degraded ecozones.

Below is a summary of the pros and cons of this approach:

Wildlife Habitat and Restoration: This alternative would make some progress toward restoring ecological integrity in both the Matrix MA and the roaded portions of the Backcountry MA. It would also have a higher and more predictable rate of large-patch young forest habitat creation in the Matrix MA. Less accessible or less commercially viable ecological restoration needs would, however, be less of a priority (compared to more efficient regeneration harvest in areas with greater accessibility). For that reason, habitat would be distributed on a smaller overall landscape. Particular species like Golden Winged Warbler would benefit from larger openings at various elevations. While more of the landscape would be in the Backcountry MA, some mechanical treatments would occur and habitat would also be provided by managed fire. The decision whether to keep areas in backcountry management would be re-evaluated in future planning cycles. The pace and scale of work would be addressed using tiered objectives (aka “stretch goals”) and adaptive management triggers, as explained in Appendix D.

Recreation: Forest visitors would experience a relatively binary forest, with large tracts of land where forests would predictably lack recent disturbance (Backcountry), and other tracts with intensive timber harvest activity (Matrix). Recreation resources like trails, rivers, and climbing areas would exist in both MAs. Scenic impacts could be more intense, but would be less broadly distributed. Hikers, anglers, paddlers, and other recreationists would enjoy large protected areas. Hunters would have fewer but bigger canopy openings to attract game. This alternative could result in greater timber receipts that could go towards enhancements of recreation resources. Coordination with a Recreation User Council and Forest-wide DOGS would help to protect recreational experiences in Matrix, because more intensive management could lead to area closures and trail impacts.

NAPs and designations: This alternative would have the most backcountry. A greater percentage of SNHAs and existing old growth would be within the Backcountry MA. While backcountry management would be compatible with these NAP values, it is possible that some may be in

need of management to improve their ecological trajectories, but they would be unlikely to receive attention unless they have existing road access. Wilderness Inventory Areas would be mapped into the Backcountry MA or captured in Special Interest Areas, which would address intact forest connectivity at the landscape level. Small patches of old growth encountered in the Matrix MA in specified dry-site ecozones (ecozones in which old growth is more common at the landscape level) could be harvested, because greater progress toward large patch restoration would be made in the Backcountry MA. Recommendations for wilderness designation would be addressed through the use of tiered objectives and adaptive management triggers, as shown in Appendix D.

Forest Products: In this alternative, timber production would be a driver for project development. As a result, this alternative would have the greatest level of predictability with respect to regeneration harvest, including harvest of mature hardwood forest. On the other hand, the shift toward timber production could result in less support for working forests (within some communities). Locally important values attached to specific places in the Matrix MA could result in minor controversies or project modifications.

Access: This alternative would provide for more frequent maintenance of system roads in the Matrix MA, because there would be more frequent entry using those roads. Although roads would be more likely to meet maintenance standards, area closures could impact open roads more frequently during project implementation. Roads that access less intensively managed areas of the forest would require partner investment to restore and maintain access. Closed roads could be placed into storage if not expected to be open to the public, freeing up funds for maintenance of open roads. At the project level, the Forest Service would restore and maintain access based on GA-specific factors while simultaneously making progress to protect aquatic ecosystems, as described in Appendix E.

The charts below provide summary information that may be helpful.

Alternative B	Land Allocated to Matrix	To Ecological Restoration	To Backcountry
Spatial	Largest	None	Largest

Alternative B	Portion of landscape open to all tools	Flow of large patch ESH	Intensity of stand-level treatment	Sunlight on the ground / Timber volume	Total number of acres treated
Spatial	Smallest	Most predictable	Mixed, but higher on average	Same or nearly same in all alternatives	Lowest

C. Alternative C. Ecological Restoration and balanced age classes - the “blended” approach

This alternative would attempt to blend ideas from the other two. By fine tuning MA allocations, it would likely support the quickest increase in the pace and scale of active management, but it would also require the greatest amount of place-based collaborative discussion.

- A large majority of the current interface and matrix would provide for both ecological restoration and balancing age classes, as in the “spatial” alternative above.
- Portions of the current interface and matrix that provide important natural area values (old growth, rare and exemplary communities, and WIA cores) and provide for natural recreation experiences would be mapped into an ecological restoration MA. The ecological restoration MA would have components like the “granular” alternative above, and it would emphasize restoration of natural settings in the long term and interpretation for active and recent projects in the short term. These areas would typically border backcountry “cores.”
- Exceptional recreation areas would be placed into the Ecological Restoration MA and would include interpretation for visitors.
- The least accessible parts of the current interface and matrix (including WRC recommended backcountry, semi-primitive non-motorized cores, and contiguous old growth and state natural areas) would move into the backcountry MA.

Below is a summary of the pros and cons of this approach:

Wildlife Habitat and Restoration: This alternative would make a medium level of progress toward restoring ecological integrity, and it would also have a moderately high and predictable flow of large-patch young forest habitat. (I.e., there would be more predictability than the granular approach and less than the spatial approach with respect to large patch ESH.) Habitat

would be distributed across a moderately large landscape. The pace and scale of work would be addressed using tiered objectives (aka “stretch goals”) and adaptive management triggers, as explained in Appendix D.

Recreation: Forest visitors would experience a mix of undisturbed areas, diverse restoration-related disturbances, and heavier timber harvest. The restoration MA would be defined with recreation as an important consideration and serve as a buffer between matrix and significant recreation resources. This could be a good fit for important recreation areas that might otherwise be appropriate for the Matrix MA. Backcountry areas would continue to offer desirable opportunities for many visitors. Hunters would have a mix of canopy opening sizes to attract game in matrix and restoration MAs. Conflicts with other multiple uses could be minimized up front by fine-tuning MA allocation. Widely distributed projects would impact recreation and scenic values in the short term, but would educate users through interpretation and would attempt to restore natural settings in the Ecological Restoration MA in the long term. In addition, receipts would be available to meet goals for recreation, access, and facilities.

NAPs and designations: This alternative would have a moderate amount of backcountry. While some NAPs would be open to active management, the focus would be management to restore ecological function, mimic natural processes, and restore natural settings. Also, while much of the forest would be open to timber production, projects in the Matrix could help to pay for treatments in the Ecological Restoration MA that would otherwise not be viable. Because many old growth and natural heritage areas would not be included in the backcountry, there is a need to identify more of those areas in the Matrix and Ecological Restoration MAs as Special Interest Areas (SIAs). Recommendations for wilderness designation would be addressed through the use of tiered objectives and adaptive management triggers, as shown in Appendix D.

Forest Products: This alternative would provide a moderate level of predictability for harvest of mature hardwood forest. There would be a large diversity of wood products, but less high-value hardwood than the spatial approach. By using commercial harvest to accomplish ecological restoration on a portion of the landscape, this alternative would help to build community support for the timber industry as partners in conservation, albeit at a slower pace than the granular approach. Local controversies and project modifications caused by locally important values attached to specific places would be infrequent but possible. The mix of harvest types would benefit both small and large purchasers.

Access: This alternative would reflect a spectrum of access, from the Matrix MA where frequent entry would provide more frequent maintenance, to the Ecological Restoration MA where a combination of harvest receipts and partner investment would take care of more remote roads, to the Backcountry MA where few roads would be found. For the few roads found in Backcountry, partner monitoring and contributions would be needed to minimize impacts to aquatic

ecosystems. At the project level, the Forest Service would restore and maintain access based on GA-specific factors while simultaneously making progress to protect aquatic ecosystems, as described in Appendix E.

The charts below provide summary information that may be helpful.

Alternative C	Land Allocated to Matrix	To Ecological Restoration	To Backcountry
Blended	Medium	Medium	Medium

Alternative C	Portion of landscape open to all tools	Flow of large patch ESH	Intensity of stand-level treatment	Sunlight on the ground / Timber volume	Total number of acres treated
Blended	Medium	Moderate predictability	Mixed	Same or nearly same in all alternatives	Moderate

D. No-Action Alternative

This alternative is required by NEPA, and not something we are proposing for consideration. However, this will provide a good baseline to compare the different ways we can improve on the status quo. We know the results of our current plan already, and they're not working for many stakeholders.

E. Summary

To summarize, as shown in the tables below, the “granular” approach (Alternative A) would emphasize context-sensitive ecological restoration over the largest total area. The “spatial” approach (Alternative B) would favor predictability and efficiency of young forest creation over context-sensitivity but would limit the distribution to avoid areas of disagreement. The “blended” approach (Alternative C) would have the second widest distribution of activities, and it would ensure predictability, efficiency, and a moderate rate of progress toward ecological restoration. We expect the total sunlight on the ground or volume of timber would be the same or nearly the same for all alternatives, but the spatial distribution, intensity, and number of total acres treated would vary. The economics of each of these options could also vary considerably.

The charts below can be used to compare and contrast these three alternatives.

Alternative	Land Allocated to Matrix	To Ecological Restoration	To Backcountry
Granular (A)	None	Largest	Smallest
Spatial (B)	Largest	None	Largest
Blended (C)	Medium	Medium	Medium

Alternative	Portion of landscape open to all tools	Flow of large patch ESH	Intensity of stand-level treatment	Sunlight on the ground / Timber volume	Total number of acres treated
Granular (A)	Largest	Least predictable	Mixed, but lower on average	Same or nearly same in all alternatives	Highest
Spatial (B)	Smallest	Most predictable	Mixed, but higher on average	Same or nearly same in all alternatives	Lowest
Blended (C)	Medium	Moderate predictability	Mixed	Same or nearly same in all alternatives	Moderate

IV. Appendix B. Meeting NEPA Requirements

It is our understanding that NEPA alternatives must meet a number of policy requirements, and we think these proposed alternatives will satisfy each of them.

First, the range of alternatives must resolve tradeoffs. The example alternatives included in Appendix A are options that would consider tradeoffs between predictability, economic efficiency, and ecological need at multiple scales without creating artificial tradeoffs between stakeholders' interests.

Second, each alternative must address one or more significant issues. The issues that the agency has identified for our planning process are wildlife habitat, designations, access, and recreation (from April 2014). Each of our example alternatives addresses these issues from a different angle, showing pros and cons of various strategies for each issue (Appendix A).

Third, the alternatives must cover the full range of reasonable public perspectives. For example, some members of the public may ask for high levels of wilderness, while others may ask for high levels of wildlife habitat creation. Instead of creating alternatives that capture the range of perspective *between different alternatives* (e.g., a low habitat alternative and a high habitat alternative), we are proposing to analyze the range of reasonable management outputs *within each alternative* using tiered objectives. In other words, each alternative would include both a lower (tier 1) and higher (tier 2) output for management goals. This would allow for progress toward multiple user interests at the same time.

Fourth, alternatives must compare “apples to apples.” This means that all plan alternatives will use the same set of management area “buckets.” We recognize that this is a challenge and in our proposed alternatives we have used three primary Management Areas: Ecological Restoration, Balancing Age Classes (Matrix), and Backcountry (see Appendix C.) In these examples, Ecological Restoration and Matrix would differ by the purpose and long-term goal of management, but not by the tools available to accomplish it. Backcountry would allow ecological restoration, but would not allow new road construction.

Note: The interface would no longer be mapped as a spatial MA, but the unique needs of open road corridors would be considered instead using forest-wide components. This would allow changes to the road system to be made more easily during implementation. Areas currently mapped as interface where the primary recreational use is hunting or wildlife related (seasonal road corridors) would not be subject to the same scenery limitations or buffers as other open roads.

V. Appendix C. Summary of Management Area Descriptions

Backcountry Management Area description needs to be changed to incorporate:

- Large blocks of remote and unroaded forest are primarily shaped by natural processes except where active management is needed and utilized to restore ecosystem structure and function.
- Mechanical treatment activities encourage and/or restore natural processes, with the goal of eliminating the need for future mechanical management (meaning that a contiguous forest canopy will be evident but in density and openness referenced in overall desired conditions).
- Where fire does not pose threats to values at risk and is naturally occurring, then it may be managed to meet desired ecological objectives.
- As in the current building blocks, existing roads can be utilized for ecological restoration; however, new road construction is not permitted.

Matrix Management Area description needs to be changed to incorporate:

- Within identified old growth communities: Permit only activities which would enhance or restore trajectory of the stand, but not reset seral stage. Restoration of composition and structure will be in accordance with the community type descriptions described in the Region 8 Old Growth guidance.
- Within natural heritage areas: Permit only those activities which would enhance or restore the composition and structure for which the natural area was designated. Restoration of composition will be in accordance with the natural community description within the most recent "Guide to the Natural Communities of North Carolina" document. Restoration of structure will be in accordance with the forest-wide goals and desired conditions derived from NRV. Landscape-level structural goals will not be the primary driver for stand-level prescriptions.
- Focus on increased implementation of prescribed fire as a habitat management tool across all seral stages. (Avoid and or safeguard areas where fire will have deleterious effects on the native community composition).
- Timber production and economic efficiency is an explicit and transparent consideration for project development.

Ecological Restoration Management Area needs to be created such that:

- Ecological Restoration is defined as a treatment that addresses all four dimensions of ecological integrity: plant and animal species composition, forest structure, connectivity/pattern, and ecosystem function/processes.
- Ecological restoration includes wildlife habitat creation where the treatment is likely to improve (or at least reasonably certain not to degrade) the stand's ecological trajectory and contribution to landscape level ecological integrity and includes working to connect young forests for disturbance dependent animals.

- Without necessarily excluding other activities, we propose that the Ecological Restoration Management Area include numerical, condition-based objectives for the following: restoration of fire dependent/adapted forested ecosystems, restoration of diversity in low diversity stands (i.e. treating uncharacteristic white pine and poplar dominated stands), restoring degraded oak-hickory forests, golden winged warbler restoration, restoring oak woodlands outside of sensitive areas, restoring aquatic organism passage through bridges and culverts, red spruce plantings, stream restoration, maintaining grassy and heath balds and adjacent ecotones, restoration of hemlock stands, American chestnut restoration, bog and wetland restoration, and non-native invasive species treatments. For example, an appropriate objective might be to move XXX acres of white pine dominated forest to young forest with appropriate species regenerating on the site.

VI. Appendix D. Summary of Collaboratively agreed upon Tiered Objectives

We recognize that the draft objectives were developed based on anticipated capacity and budgets as directed in the 2012 Planning Rule and Directives; however, we would like to see tiered objectives that provide a base level and objective growth if additional resources are secured, public-private cooperatives are realized, or innovative and efficient tools are used.

Early seral / young forest habitats*

Treatment	Base Tier (Fiscally Constrained)		Stretch Tier (w/additional resources)	
	Annual	Per Decade	Annual	Per Decade
Regeneration Harvest	1,200 - 1,600 acres	12,000-16,000 acres	1,600 to 3,200 acres	16,000-32,000 acres
Severe controlled burns	250 - 750 acres	2,500-7,500 acres	750 - 1,500 acres	7,500-15,000 acres
TOTAL	1,450-2,350 acres	14,500-23,500 acres	2,350-4,700 acres	23,500-47,000 acres

***Graham County share of this acreage would be the following:**

Graham County Early seral / young forest habitats

Treatment	Base Tier (Fiscally Constrained)		Stretch Tier (w/additional resources)	
	Annual	Per Decade	Annual	Per Decade
Regeneration Harvest	153 – 204 acres	1,532-2,043 acres	204 to 409 acres	2,043-4,090 acres
Severe controlled burns	32 - 96 acres	319-960 acres	96 - 192 acres	960-1,920 acres
TOTAL	185-300 acres	1,851-3,003 acres	300-601 acres	3,003-6,010 acres

Woodland/Savanna habitat*

Treatment	Base Tier (Fiscally Constrained)		Stretch Tier (w/additional resources)	
	Annual	Per Decade	Annual	Per Decade
Commercial and non-commercial thinning	500 - 1,000 acres	5,000-10,000 acres	1,000 - 3,300 acres	10,000-33,000 acres
Controlled burns	500 - 1,500 acres	5,000-15,000 acres	1,500 - 3,000 acres	15,000-30,000 acres
TOTAL	1,000-2,500 acres	10,000-25,000 acres	2,500-6,300 acres	25,000-63,000 acres

***Graham County share of this acreage would be the following:**

Graham County Woodland/Savanna habitat

Treatment	Base Tier (Fiscally Constrained)		Stretch Tier (w/additional resources)	
	Annual	Per Decade	Annual	Per Decade
Commercial and non-commercial thinning	64 - 128 acres	639-1,277 acres	128 - 421 acres	1,280-4210 acres
Controlled burns	64 - 192 acres	639-1,916 acres	192 - 383 acres	1,916-3,831 acres
TOTAL	128-320 acres	1,278-3,193 acres	320-804 acres	3,196-8,041 acres

Wilderness Recommendations

Base Tier	Stretch Tier (Provisional)
58,000 acres	Additional 50,000 acres

VII. Appendix E: Roads and Access- (Included in Chapter 2)