

## **Revising the Nantahala and Pisgah Land Management Plan – Need to Change the Existing Land Management Plan**

### **Throughout the Plan**

1. There is a need to revise the plan so that it complies with the direction in the 2012 Planning Rule (36 CFR 219). Revision of the plan should also take into account applicable provisions of the Agriculture Act of 2014 (“2014 Farm Bill”) and the Tribal Forest Protection Act (2004). This may include consideration of collaborative proposals for forest management that can promote agreement during plan implementation.
2. There is a need for the revised plan to address how forest management in all resource areas should be prioritized given varying levels of money and personnel likely to be available over the course of the planning cycle. Plans have historically overpromised what could be accomplished, with limited regard for fiscal realities. Yet there is also a desire to keep options open in case unexpected funds and/or capacity become available.
3. There is a need to review the overall management area (MA) framework used in the 1987 Plan to determine if the current framework works or may have resulted in unintended obstacles to implementation of plan objectives.
  - a. The 21 MAs and their arrangement, boundaries, and plan direction need to be modified to reduce complexity and increase flexibility for restoration and creation of wildlife habitat.
  - b. Physical and biological land characteristics and resource management needs should drive the management area delineations. Delineation of assessment areas for integrated project planning could be considered, possibly based on watersheds.
  - c. Management area objectives need to reflect realistic expectations regarding the amount of work that can be achieved within a planning cycle.
4. There is a need to recognize and include plan components to guide and potentially enhance the role of the Nantahala and Pisgah NFs contribution to social and economic sustainability by supporting local cultures and economies through commodity production, including timber and other multiple-use products, and the service-based economy that includes recreation and tourism.
5. There is a need to include plan direction regarding potential climate change impacts such as increases in storm events, flooding, and other extreme weather. The 2012 Planning Rule requires monitoring for measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area. Effective measures for monitoring these stressors will need to be identified.

6. There is a need to incorporate opportunities for working across boundaries to manage landscapes with adjacent land managers such as state and federal partners, Tribes and other land management entities. Management across state lines on adjacent national forests should be taken into account.

### **Lands and Boundaries of the National Forest**

7. There is a need to ensure the revised plan direction accurately reflects the essence of the 2008 Land Adjustment Strategy, aiming for contiguity of the land base and reduction of small unmanageable tracts. There is a need for tracts acquired in the past 20 years to be assigned to the appropriate management area, and to provide plan direction for how to assign future land acquisitions.
8. Complete up-to-date marking of national forest boundaries appears unattainable; a situation that can result in problems such as timber trespasses or encroachments. There is a need to provide plan direction for boundary line maintenance that recognizes some areas are at greater risk for trespass and encroachment than others.

### **Geology, Minerals and Energy**

9. There is a need to clarify plan direction regarding recreational metal detecting, mineral collection, and gold panning.
10. There is a need to ensure adequate direction exists for management in areas with acidic rock and other geologic hazards; including direction regarding management-related risks associated with geologic hazards.
11. There is a need to coordinate with the USDI Bureau of Land Management and update plan direction to address potential commercial oil, gas, and hardrock mineral leases, taking into account other compatible and incompatible multiple-use objectives and desired conditions.
12. There is a need to include plan direction in anticipation of potential proposals for transmission corridors and renewable energy generation, including biomass, taking into account other compatible and incompatible multiple-use objectives and desired conditions.

### **Timber Production and Non-timber Forest Products**

13. There is a need to reconsider which areas of the national forests are available for timber management and potentially set different priorities for when and where timber harvest may occur, facilitating an appropriate level of sustainable timber production. This includes clarifying and accounting for the difference between suitability and operability, with

consideration for prioritizing timber harvest on areas supported by the existing road infrastructure as well as wildlife habitat restoration needs. The Plan will have an upper limit for the quantity of timber sold (36 CFR 219.11).

14. To support the traditions and culture of American Indian Tribes and other residents of western North Carolina, there is a need for the plan to provide direction for management and possible enhancement of non-timber forest products – plants used for food, fuel, medicine, crafts, etc.

### **Maintenance and Restoration of Ecosystems, Rare Habitats and Rare Species**

15. Plan components to maintain and restore terrestrial ecosystems will be included. There is a need to restore rare plant and animal communities. Some rare habitats are being impacted by trampling, digging, and other activities. There is a need to provide direction to proactively manage rare habitats such as southern Appalachian bogs, high elevation grassy balds, and spruce-fir forests. There is a need to consider if connectivity corridors, buffer zones and/or refugia are needed for some rare habitats and species.
16. There is a need to provide direction for restoring plant and animal communities with altered or changing species composition and structure, including those that are fire-dependent or fire-adapted, so they will be resilient over time and meet the habitat needs for a diversity of native plant and animal species, including suitable habitat for rare species. Ecosystem diversity is provided by maintaining or restoring key ecosystem characteristics and ecological conditions needed to maintain rare species.
17. There is a need to provide plan direction to better control the introduction and spread of non-native invasive species on the national forest, including direction that would minimize the spread of non-native plants that may increase as a result of some activities.
18. There is a need to enhance plan flexibility to address current and future forest health impacts including insect pests, diseases, and pathogens.
19. There is a need to include plan direction for prescribed fire management by incorporating direction established by plan amendment #26 in 2011 that directs an integrated resource approach to prescribed fire activities and includes direction that allows flexibility for restoration and maintenance of ecosystems while addressing public safety and health concerns.
20. There is a need to provide for the possibility of reintroducing fungus-resistant American chestnuts.

## **Maintaining and Restoring Watersheds**

21. There is a need to ensure that the plan contains direction to protect soil and water quality. Plan components to maintain and restore the ecological integrity of aquatic ecosystems and watersheds will be included. Direction for addressing declining riparian habitat conditions due to loss of hemlock to hemlock woolly adelgids should be considered.
22. There is a need to identify priority watersheds for restoration (36 CFR 217.7(f)(I)(i)). There is a need to ensure that direction is appropriate for addressing sedimentation concerns from all sources, and impacts from acidic deposition. Direction should be included to support restoration of impaired waters and soils (including from acidification) in or adjacent to NFS land.
23. There is a need to reconsider the 1987 Plan's Riparian Management Area concept and possibly move toward greater integration of state best management practices guidelines which take into account factors such as stream order and slope while still giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes. Some areas may benefit from certain types of vegetation management not accounted for in the 1987 Plan, such as when streamsides are occupied by non-native invasive species or experiencing low diversity as is the case when rhododendron takes over after the loss of hemlocks. Other areas, such as known occurrences of rare species, unique habitats, or specific geologic features, may benefit from additional monitoring and possible limitations on use.
24. There is a need for management direction regarding municipal watersheds and groundwater; considering current and anticipated uses, and the anticipated ecological impacts.

## **Wildlife and Fish Habitat**

25. There is a need to provide for diversity of plant and animal communities based on the suitability and capability of land areas and to meet multiple use plan objectives.
26. There is a need to restore declining wildlife habitat and to consider species in decline, including game and non-game species appreciated by wildlife enthusiasts such as hunters, anglers, birders, etc. New tools such as remote sensing may expand options for wildlife habitat management; incorporating more information about ecosystems and spatial and structural features, including open and closed canopy conditions and connectivity.
27. There is a need to take into account the goals and objectives of the State Wildlife Action Plan, considering the potential for integrating desired outcomes and thereby leveraging effectiveness.

28. Young forest, also known as early successional habitat, is an essential habitat component for many wildlife species. The best available scientific information indicates it is in short supply across the forests of western North Carolina, especially on national forest system lands. While the 1987 Plan directs creation of a certain amount of young forest, various limiting factors have constrained that creation. There is a need to provide direction that will increase the amount of young forest across the landscape.
29. In addition to young forest, there is a need to provide direction to restore habitat components such as tree species composition and canopy structure in a variety of ecosystems. Ensuring a realistic amount of oak regeneration to provide hard mast in appropriate ecozones and improving tree species diversity in low diversity stands are important components.
30. There is a need to retain a diversity of management options including timber harvest, prescribed burning, and other vegetation management techniques to provide wildlife habitat for species that need a variety of forest habitats such as interior, edge, young, and old forest. The plan should facilitate an integrated approach for all projects to leverage opportunities for enhancing wildlife habitat.
31. Elk introduced to the Great Smoky Mountains National Park are multiplying and expanding their range. National Forest System lands adjacent to the park provide some of the best opportunities for range expansion where appropriate habitat is available. There is a need to include plan direction for managing elk habitat in anticipation of their expanding range.
32. There is a need to ensure that the plan includes direction to protect aquatic habitats.
33. There is a need to consider restoring aquatic communities by reintroducing species such as native mussels.
34. There is a need to include direction for improving aquatic organism passage in streams where it is compromised. Direction should be included for restoring and expanding the range of native aquatic species and connectivity of fragmented populations, with extra consideration of areas with high aquatic biological diversity.

## **Scenery**

35. There is a need to fully integrate scenery management as a part of ecosystem management for the national forests, allowing for activities that support ecological health and that create and enhance diverse wildlife habitats, while retaining and enhancing pleasant and interesting scenery that supports tourism. The plan should recognize that scenery management can be

integrated with restoration, habitat diversity and timber management to further positive outcomes for all resources.

## **Designated Areas**

36. There is a need to clarify and update plan direction regarding designated areas including Special Interest Areas, Roan Mountain, the Appalachian Trail, Experimental Forests, and old growth areas. As well, there is a need to update the current list of Special Interest Areas and consider other proposals for special designations.
37. There is a need to conduct an inventory and evaluation of potential additions to wilderness and identify the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System (36 CFR 219.10). There is a need to reconsider recommendations for wilderness and update plan direction regarding management of wilderness study areas.
38. There is a need to update plan direction for managing wilderness. Particular issues to consider include overuse, special use permitting, the use of prescribed fire, and control of non-native species.
39. There is a need to clarify management direction for the congressionally designated Cradle of Forestry in America, in light of its original intent to demonstrate and provide education about multiple use forest management.
40. For Bent Creek Experimental Forest, there is a need to clarify management for continued recreation while ensuring research objectives are met. There is a need for the plan to recognize the North Carolina Arboretum, established as a long term special use within Bent Creek Experimental Forest.
41. There is a need include plan direction for Inventoried Roadless Areas, including opportunities for ecosystem restoration while maintaining their backcountry character.

## **Roads**

42. There is a need for new approaches for managing roads given the reality of limited maintenance funds combined with the public's desire for motorized access to the forest. This may include considering partnerships for road maintenance, establishing priorities for maintenance to minimize or mitigate resource damage, and promoting public safety. This could involve reducing service levels on little-used roads while retaining access for non-motorized uses. Direction could be reconsidered for when and in what circumstances roads are opened and direction ensuring adequate drainage features in light of increasing storm events.
43. There is a need to update the plan to reduce the amount of anticipated road construction and reconstruction and include direction for closing out unneeded roads, including temporary roads

and roads in environmentally or geologically hazardous locations. Priority for decommissioning could be given to legacy roads in locations with an increased risk of landslides.

44. There is a need for plan direction that acknowledges the public's desire to access the national forest, including hunter and angler access and access for those with disabilities, and forest managers need for access for restoration activities. At the same time, access needs must be balanced with fiscal realities.

## **Cultural Resources**

45. Plan direction needs to support evaluation of cultural resource sites after they are located, as well as sustainability of significant sites. When sites are located but not evaluated, ground disturbing activities or uses must be avoided. However, if evaluation indicates the site is not significant, activities and uses may be able to proceed unimpeded. Creative approaches are needed in light of limited capacity for evaluating sites.
46. There is a need for plan direction for acknowledgement and management of traditional cultural properties and sacred sites, such as the Trail of Tears.
47. There is a need to consider landscapes of cultural value in management area delineation, including former Cherokee town sites, historic trail corridors, and high elevation balds.

## **Conservation Education**

48. To foster sustainable use and conservation, there is a need to enhance public understanding and appreciation for natural and cultural resources and their management.
49. There is a need for the plan to promote conservation education opportunities and connecting people with nature through volunteers and partners regarding national forest management, sustainability of non-timber forest products, wildlife viewing, recreation and other multiple uses. As well, there is a need to encourage participation by Tribes, youth, low income, and minority populations (36 CFR 219(a)(1)(ii)).

## **Recreation**

50. There is a need for plan direction that addresses how to transition recreational facilities to a sustainable level.
  - a. Plan direction for infrastructure maintenance, design and improvement could support the intended use and long-term sustainability; for example, trails that permit equestrian use should have trailhead parking that accommodates horse trailers.
  - b. Plan direction could address opportunities to expand the roles of volunteer and partners.

- c. Plan direction could provide guidance to help determine and prioritize the kinds of recreation opportunities to provide and where.
51. There is a need to be responsive to changing trends in services, activities and types of facilities desired by the public, while balancing those trends with fiscal reality. Trends include:
- a. Demographic expectations for an older and more ethnically diverse population,
  - b. The desire for barrier-free accessibility ,
  - c. Promoting outdoor physical activities, especially among youth ,
  - d. Increasing demand for day use and decreasing demand for developed overnight use, and
  - e. Increasing interest in wildlife viewing.
52. There is a need for the plan to continue to incorporate hunting and fishing in planning for outdoor recreation as examples of activities that help in educating new generations to the values and benefits of forest land and outdoor recreation. This provides an opportunity for melding Executive Order 13443 – Facilitation of Hunting Heritage with Wildlife Conservation and Presidential Memorandum – America’s Great Outdoors.
53. There is a need for plan direction to address public safety, including geologic and hydrologic concerns; potential user conflicts; issues with adjacent landowners; conservation of natural resources; riparian area protection and how recreation activities affect priority watersheds; and maximizing effective use of available funds.

## **Trails**

54. There is a need for the plan to better address the sustainability of the trail systems, and consider the recommendations in the Nantahala and Pisgah Trail Strategy. Plan direction could address:
- a. New approaches to trail maintenance given the reality of limited maintenance funds; focusing priority on trails that are financially, environmentally, and socially sustainable;
  - b. Ways to address the supply and demand for mountain biking and equestrian use, while not diminishing the opportunities or experiences for hikers. In some areas it may be appropriate for hiking, equestrian, and mountain bike use to occur on the same trails, while in other areas a separation of uses may be more appropriate. In some locations, restricting equestrian and mountain bike use to designated routes or areas may need to be considered;
  - c. Working with local communities that wish to promote certain trail systems and special events – such as for mountain biking –to support the community while not compromising other recreation users or other multiple-use objectives;
  - d. The use of partnerships, volunteers, and user councils to assist with maintenance issues and to recommend solutions to user conflicts; and
  - e. Assessment and management of unauthorized trails.



## **Special Uses**

55. Elements of the special use permitting process are the subject of law, regulation and policy that is not amenable to a Forest Plan decision. At same time, there is a need to update plan direction regarding special uses. Direction should be reexamined to determine if it conveys support for appropriate special uses of the national forest that provide public benefits, including economic and other community benefits. In addition, the direction should ensure forest resource impacts are minimized and the discretion of Forest Service decision makers is maintained. Among the areas where specific guidance may be needed are:

- a. Permitting for large and/or recurring events, including seasonal limitations;
- b. Permitting associated with the Appalachian National Scenic Trail and other nationally designated trails and corridors;
- c. Screening criteria for consideration of special use permits;
- d. Carrying capacity of areas versus the number of outfitters desiring permits;
- e. Clarifying resource protections associated with special use permitting such as road maintenance requirements for private easements; and
- f. Clarifying use of the national forests for research activities.