



USDA Forest Service  
Nantahala Ranger District  
90 Sloan Road  
Franklin, North Carolina 28734  
Attn: Mike Wilkins, District Ranger

March 20, 2017

Re: Southside Project scoping comments

Mike,

The Nantahala Ranger District in North Carolina has released a “scoping notice” for a proposed timber sale in the heart of the Chattooga River headwaters, called the Southside Project. The proposed project would involve 352 acres of timber harvesting, extensive herbicide applications, and road-building. The Chattooga Conservancy has examined the details of the proposed Southside Project, and has also visited several of the proposed logging sites in the field.

Here are our scoping comments on the Southside Project.

**General Findings** We are opposed to this project as it is currently designed, for the reasons stated below. We also base this opposition on our opinion that the Forest Service has failed to provide the public with vital information concerning this project, that is necessary to make an informed decision about the proposed action, which includes: information regarding stand age class; the presence of old growth timber within proposed timber harvest areas; the presence of old growth protection patches as designated; and, due consideration of the project’s negative effects on the Ellicott Rock Wilderness Extension Area, proposed North Carolina Natural Heritage Areas, scenic beauty, recreation activities, biodiversity, wildlife and fisheries.

The Southside Project, as currently proposed, would damage the ecological and aesthetic character of public lands in the Highlands-Cashiers area. It would also unfairly/negatively prejudice the ongoing revision of the Land and Resource Management Plan (LRMP) for the Nantahala-Pisgah National Forest. The project should be re-designed to protect special places in the project area and postponed until the new LRMP is in place.

### **Standing**

The Chattooga Conservancy is a non-profit grassroots conservation organization working to protect, promote, and restore the natural ecological integrity of Chattooga River watershed ecosystems; to ensure the viability of native species in harmony with the need for a healthy human environment; and,

to educate and empower communities to practice good stewardship on public and private lands. The Chattooga Conservancy has an organizational interest in the proper and lawful management of public lands within the Chattooga River watershed, including the Sumter, Nantahala-Pisgah and Chattahoochee-Oconee National Forests. Members, staff, and board members participate in a wide range of recreational activities on these national forest lands, including those areas within the Nantahala National Forest that are proposed for management activities in the Southside Project scoping notice. The Chattooga Conservancy represents approximately 600 total members that support our work.

The Chattooga Conservancy claims standing to participate in the public land decision-making process on the grounds that it has been involved in national forest land management issues concerning the Chattooga River watershed since its formation, including the current proposed project. Our members have sought and continue to seek solitude, forested scenery, old-growth stands, and hiking, fishing, hunting, paddling, rafting and photographing experiences within the Nantahala National Forest, including the portion of the project area that would be affected by the Southside Project. Our collective membership includes professional photographers and recreational guides whose livelihoods depend, in part, on the remote and beautiful nature of the Chattooga Wild and Scenic River, including the project area, remaining intact. Other members also rely on the opportunities for solitude and seclusion provided in the headwaters region of the Chattooga River. (A map “Southside Project Special Area Overlay Map” should be used for reference for the following narrative)

#### **Jacks Creek is a Brook Trout Stream & Feeds the Walhalla State Fish Hatchery (Units 40/21 and 40/42)**

The Southside Project calls for logging in the steep terrain around Jacks Creek, near Highway 107. Jacks Creek is one of the few remaining wild brook trout streams in the area. It also feeds into the East Fork of the Chattooga River, which, in turn, feeds the Walhalla State Fish Hatchery. Logging and herbicides could harm brook trout populations in Jacks Creek by diminishing required environmental conditions—namely, cold, clean and clear water. It could also adversely impact the Walhalla State Fish Hatchery. In addition, logging in this area would also have a negative impact on, and be visible from, the Foothills Trail. The Forest Service should not permit logging that could degrade Jacks Creek, and the Foothills Trail.

#### **Old-Growth on Brushy Mountain (Unit 35/41)**

The Southside Project calls for logging and road construction on top of Brushy Mountain. This area is a wildlife corridor connecting Terrapin Mountain with the Ellicott Rock Wilderness, and contains a beautiful, old growth hardwood forest—over 200 years old—exhibiting outstanding diversity. (Note that the Forest Service’s CISC date for unit 35/41 is incorrect.) Old and diverse forests provide excellent habitat for a range of fish and wildlife species, and add to the unique aesthetic character of the Highlands-Cashiers area. The Brushy Mountain area also lies within viewshed of Ravenel Park (Sunrise Rock) and multiple homes on Sagee Ridge. The Forest Service should not log, or build a road, on top of Brushy Mountain. Regarding unit 35/42, the Forest Service’s CISC data indicates that this stand could be well over 100 years old, and therefore we suggest that this area should be managed for old growth restoration, contiguous with the old growth on the summit of Brushy Mountain.

### **Natural Heritage Area and Granite City (Unit 31/18)**

The Southside Project calls for logging within the proposed Blackrock/Granite City NC Natural Heritage Area, within 3,000 feet of Granite City, a popular recreation destination. A Natural Heritage Area is an area of land or water that is important for the conservation of the natural biodiversity of the State of North Carolina. Logging within a Natural Heritage Area would reduce its ability to contribute to ecological diversity. Logging here would also degrade the aesthetic and recreational experiences at Granite City. The Forest Service should not log in Natural Heritage Areas.

### **Designated Old-Growth Near Granite City (Unit 31/18)**

The Southside Project calls for logging near Granite City. In addition to being located within a Natural Heritage Area site, this area is also located within a designated old-growth patch. The Forest Service is required to manage designated old-growth patches for their old-growth characteristics, not for their timber products or early successional habitat. In addition, trees in Unit 31/18 are over 150 years old and should be managed as old growth. The Forest Service should not log in old growth and designated old-growth patches within the project area.

### **Slick Rock and Green Salamander Habitat (Units 29/11 and 29/16)**

The Southside Project calls for logging adjacent to the Slick Rock Natural Heritage Area and habitat for the Green Salamander. The Forest Service's logging activities would negatively impact habitat for the Green Salamander, which is a federally-listed endangered species. The proposed timber harvest near Slick Rock, a known breeding and feeding site for the green salamander, would reduce humidity required by the Green Salamander in breeding sites on Slick Rock, and eliminate feeding areas. The Forest Service should not permit logging that would damage Green Salamander habitat.

**Old Growth near Ammons Branch** Unit 29/17 and Unit 30/16 propose to cut 29 acres of 100-year-old white pine contiguous with a patch of old growth forest identified in the Forest Service old growth study entitled "Carlson Old Growth Study." We request that these unit/stands be withdrawn and managed as old growth restoration areas, to expand the old growth patch at Ammons Branch.

### **Wilderness Implications (Units 30/16 and 29/17)**

The Southside Project proposes logging and road building activity in the Ellicott Rock Extension Area, which is currently being considered for wilderness designation in the new draft LRMP for the Nantahala-Pisgah National Forest. Logging in this area would significantly weaken its potential for wilderness designation. The Forest Service should not log or engage in road construction activities within the Ellicott Rock Wilderness Extension Area.

**Scenery and Recreation (Units 29/16 and 29/17)** Heavy timber harvesting and temporary road construction along the Glade Mountain Trail would destroy scenery, and impact recreation use on the Glade Mountain Trail. The Forest Service should not log around the Glade Mountain Trail.

**Herbicides** We also oppose the heavy use of herbicides in the Southside Project. The long term effects of herbicides on human, biological and aquatic health are unknown.

**Silvicultural Treatments** In general, the Chattooga Conservancy opposes the Southside Project's proposed application of 2-aged regeneration harvests, a variant of even-age timber management. Also in general, we would request un-even age silvicultural prescriptions and/or small group selection (size of the group no larger than twice the height of the tallest tree in the stand), which more closely mimic natural disturbances.

**Whitewater River Sector** We are also concerned about the proposed heavy, 2-age management along the Whitewater River watershed, contiguous with the Chattooga River watershed, and the overlap with the Whitewater River Natural Heritage Area that could cause sedimentation, and harm recreation, scenic and biological values.

For the aforementioned reasons, we strongly request that this project be re-designed to protect special places in the project area, and postponed until the new LRMP is in place. We also request that the Southside Project be re-designed and deferred because of the failure of the Forest Service to provide necessary information for an informed public process. In addition, we feel strongly that the project be withdrawn because it would prejudice the ongoing revision of the Nantahala-Pisgah Land and Resource Management Plan. When finalized, the revised forest plan should contain new and valuable information not contained in the current, outdated plan that was put in place 23 years ago.

Sincerely,



Nicole Hayler