



United States
Department of
Agriculture

Forest
Service

National Forests in North Carolina
Pisgah National Forest
Pisgah Ranger District

1001 Pisgah Hwy
Pisgah Forest, NC 27868-7721
828-877-3265

File Code: 1900

Date: June 18, 2008

Dear Interested Members of the Public and Forest Users:

I have signed the Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the Macedonia Environmental Assessment (EA) within the Pisgah Ranger District, Transylvania County. The DN discusses in detail my decision and rationale for reaching it. Copies of the DN and FONSI are enclosed. The November 2007 EA was updated slightly to respond to public comments and the final June 2008 document and Roads Analysis are available upon request or can be downloaded from the Forest's website: www.cs.unca.edu/nfsnc/nepa/nepa.htm.

This decision is subject to appeal pursuant to 36 CFR 215.11. A written appeal, including attachments, must be postmarked or received within 45 days after the date this notice is published in *The Asheville Citizen-Times*. The Appeal shall be sent to National Forests in North Carolina, ATTN: Appeals Deciding Officer, 160-A Zillicoa Street, Asheville, North Carolina, 28801. Appeals may be faxed to (828) 257-4263. Hand-delivered appeals must be received within normal business hours of 8:00 a.m. to 4:30 p.m. Appeals may also be mailed electronically in a common digital format to: **appeals-southern-north-carolina@fs.fed.us**.

Those who provided comments or otherwise expressed interest in a particular proposed action by the close of the comment period may appeal this decision (as per the recent *The Wilderness Society v. Rey* ruling). Appeals must meet content requirements of 36 CFR 215.14. For further information on this decision contact Michael Hutchins, Pisgah National Forest NEPA Coordinator at 828-682-6146.

Sincerely,

/s/ Randall Burgess
RANDALL BURGESS
District Ranger

Enclosure





United States
Department of
Agriculture

Southern Region
Forest Service

June 2008



Macedonia

Decision Notice

And

Finding Of No Significant Impact

Pisgah Ranger District, Pisgah National Forest
Transylvania County, North Carolina

Decision Notice
& Finding of No Significant Impact

Macedonia Project

USDA Forest Service
Pisgah Ranger District, Pisgah National Forest
Transylvania County, North Carolina

Decision and Rationale

Decision

Based upon my review of the alternatives, I have decided to select **Alternative C** (Selected Alternative) of the Macedonia Project Environmental Assessment (EA – see Section 2.2.3, Chapter 2) on the Pisgah Ranger District, Pisgah National Forest and the Project Design Features listed in Section 2.4, Chapter 2 and Appendix F of the Macedonia Project EA. The Selected Alternative will:

- Harvest about 281 acres using the two-age regeneration harvest prescription¹.
- Harvest about 38 acres using the intermediate thinning harvest method².
- Site prepare for natural regeneration with herbicide and hand tools on the 281 acres of two-aged harvest using Triclopyr ester and amine formulations with the cut stump and streamline application methods to ensure establishment of a satisfactory stand within 5 years after final harvest. All regenerated stands will be monitored for desired stocking density and species variety with a stocking survey conducted 3–5 growing seasons following site preparation.
- Release natural regenerated hardwoods on 281 acres with a 20% Triclopyr ester formulation by streamline application method 1–3 years

¹ 15-20 ft² residual basal area per acre. Harvesting would include developing about 13 acres total of log landings and skid roads within harvest units (about 1 acre of log landings and skid roads for each 25 acres harvested). Existing log landings and skid roads would be used where available. Skid roads and log landings would be constructed using North Carolina Forest Practices Guidelines (FPGs) and Forest Plan standards (best management practices or BMPs). Following harvest activities, unsurfaced skid roads and log landings would be disked and seeded with an appropriate seed mix to reduce potential for sedimentation and compaction.

² Treat white pine stumps with Sporex to control/manage annosus root rot

- following site preparation to control stump sprouts and non-native invasive plants.
- Control/manage existing non-native invasive plant species along haul routes and haul routes adjacent to existing and proposed harvest stands with herbicide. Prior to harvest, treat non-native invasive plants along Forest Service Roads (FSR) adjacent to harvest stands with herbicides and/or manual methods.
- Construct approximately 0.7 miles of new system road; reconstruct and align approximately 5.0 miles of existing FSRs; construct 0.8 mile of temporary roads; and improve and add approximately 2.5 miles of existing old “woods” (non-system) roads to the Forest Road System to provide access for timber management within Management Area 3B. These roads added to the transportation system will be improved and maintained to service level D standards (RMO D1 and D5) and will be closed to public vehicular use when management activities are complete. The current access management of the roads to be reconstructed will remain when management activities are completed. The temporary roads will be disked and seeded following management activities.
- Designate stands 111-22, 115-06, 115-19, 116-16, and 117-03, 126-04 as small patch old growth (338 acres).
- Develop approximately 1.2 acres of linear wildlife fields on the access roads to 111-13, and 116-05; access roads will have an RMO D5 and will be closed to motorized vehicle, horses and bicycles following project implementation.
- Perform Timber Stand Improvement (TSI) on 254 acres of natural hardwood regeneration to ensure desired stocking density, species variety and to control nonnative invasive species in 11 stands with hand tools and herbicide using Triclopyr amine and ester formulations applied

with the cut surface and streamline applications to release crop trees.

- Reconstruct approximately 0.3 miles of existing fire line around Stand 111-12 for protection of a white pine progeny test area (young trees) from wildfire.
- Stabilize about ½ mile of stream channel within the Tucker Creek drainage in Stands 111-05 and 111-04.
- Repair and restore bog habitat near Stand 111-09 by pulling the existing and failing earthen dam back far enough to preclude further silt entry into the stream (10' minimum). This task will require hand tools or a small machine (Dingo, Bobcat, etc.) to accomplish. Place several log structures into the lower reach of the stream so that water flow will exit into the wetlands and create improved habitat for present wetland plant species and increase potential for bog turtle (*Clemmys mublenbergii*) utilization.

As stated above, my decision incorporates Project Design Features disclosed in the EA. In addition, the following design feature will be incorporated with this decision:

- Property owners downstream of Tucker Creek will be informed of the stream stabilization, bog restoration, and removal of the earthen dam prior to implementation. All actions will have appropriate erosion control measures in place to reduce potential for erosion and sedimentation.

Rationale

The purpose and need for the proposal is disclosed in Section 1.3, Chapter 1 and summarized below:

- There is a need to develop between 5%-15% early-successional (0-10 year age class) wildlife habitat in the project area because there is currently no 0-10 year wildlife habitat;
- There is a need to thin white pine stands within Compartments 111 and 117 because thinning white pine improves vigor and growth of the residuals so they are less susceptible to the attack of forest pests;
- There is a need to effectively and efficiently control/manage competing vegetation in existing regeneration harvest stands and stands proposed for regeneration harvest with this proposal because competing vegetation reduces vigor and amount of desired tree species;
- There is a need to efficiently and effectively control/manage populations of non-native

invasive plants, especially near Tucker Creek because they have been found in the project area;

- There is a need to improve water quality and fish/wildlife (wetland) habitat along Tucker Creek and a tributary to Tucker Creek because there is a lack of large woody debris, erosion of stream banks, and encroachment of white pine upon a mountain bog;
- There is a need to designate small patch old growth communities in Compartments 111, 115, 116, 117, and 126 because no small patch old growth communities are currently designated in them; and
- There is a need to develop additional acres of permanent grass/forb wildlife habitat in the project area because there are currently three acres of permanent grass/forb wildlife habitat.

I believe this alternative meets the purpose and need while best addressing key issues regarding water quality, wetlands habitat, and cultural resources. The Selected Alternative will provide much needed early successional habitat for turkey and other wildlife species that need these habitat conditions. The Selected Alternative is the only action alternative that will remove the earthen dam on a tributary to Tucker Creek—removing this earthen dam will improve aquatic habitat in the area. The Selected Alternative does not harvest units that had a high occurrence of cultural resources within and near them – as a result, the potential for adverse impacts to cultural resources is reduced from Alternative B (see Alternative B below).

Following review of public comments on the proposal, it became evident some members of the public were concerned about the current and long-term road system in the area. As stated above, my decision will place about 2.5 miles of existing non-system roads onto the Forest Road System after project implementation. Because the Macedonia area is designated as Management Area 3B (timber emphasis) in the Forest Plan, I believe improving and using these roads and adding them to the Forest Road System for future use is necessary to ensure access for sustainable timber management can take place. They would also be closed to vehicular use following implementation of this project. I believe that developing about 0.7 miles of new system road; reconstructing about 5 miles of existing system road; and constructing about 0.8 miles of temporary roads are also necessary for efficient access to implement the Selected Alternative. The 0.7 miles of new system roads would be closed following project

implementation and the 0.8 miles of temporary roads would be ripped, seeded, and closed following project implementation.

In reaching my decision, I began by reviewing the purpose and need for the project and all of the alternatives presented in the Environmental Assessment (EA). I then carefully weighed the effects analyses of the alternatives analyzed in detail and the public comments received on the EA. The Macedonia Project Interdisciplinary Team (IDT) conducted field surveys, database queries, and other localized analysis in order to determine effects the alternatives analyzed in detail could have on the area's ecology, including threatened, endangered, and sensitive species. During their analyses, they took a hard look at past, present, and reasonably foreseeable future actions that could be combined with expected effects from the Macedonia proposal. I believe they provided me sufficient analyses and conclusions to make a reasoned decision.

Other Alternatives Considered

In addition to the Selected Alternative, I considered three other alternatives in detail: Alternative A – No Action, Alternative B – Proposed Action, and Alternative D. A description of these alternatives can be found in Sections 1.2, Chapter 1 and 2.2, Chapter 2.

Alternative A – No Action

Under this alternative current management plans, such as existing wildlife management, wildfire suppression, general road maintenance, and special use permit operations, would continue to guide management of the project area. I did not select this alternative for several reasons. This alternative would not have provided habitat conditions for wildlife species; thinned white pine stands; released natural regenerated hardwoods; performed TSI treatments; designated small patch old growth; developed linear wildlife openings; reconstructed the fireline around stand 111-12; addressed the erosion at the earthen dam; stabilized a reach of Tucker Creek; nor used herbicides to control/manage non-native invasive plants. I believe active management is needed to move the area towards the Forest Plan's desired future condition as described in the Purpose and Need (Section 1.3, Chapter 1).

Alternative B – Proposed Action

Under this alternative about 38 additional acres of two-age harvest; one additional acre of white pine

thinning harvest; 38 additional acres of site preparation/natural hardwoods released; one more acre of white pine stumps treated with Sporang; 0.9 additional acres of linear grass/forb habitat developed; the earthen dam would be repaired but not removed; 0.6 additional miles of non-system roads used and added to the Forest Road System; and 0.2 additional miles of temporary roads would be constructed when compared to the Selected Alternative—all other actions are the same as the Selected Alternative. I did not select this alternative because detailed field surveys identified cultural sites requiring protection and the most feasible way to protect them was to reduce the area/acres treated. In addition, I believe removing the earthen dam under the Selected Alternative will better improve aquatic habitat in the area.

Alternative D

Under this alternative about 103 less acres of two-age harvest; 18 less acre of white pine thinning harvest; 103 less acres of site preparation/natural hardwoods released; 32 less acres of TSI using herbicides; 18 less acres of white pine stumps treated with Sporang; no linear grass/forb habitat developed; the earthen dam would be repaired but not removed; the fireline around 111-12 would not be reconstructed; no non-system roads used and added to the Forest Road System; the earthen dam would be repaired and not removed; no new system roads would be constructed; and 0.3 additional miles of temporary roads would be constructed when compared to the Selected Alternative—all other actions are the same as the Selected Alternative. I did not select this alternative because it does not meet minimum Forest Plan standards for early successional habitat developed at the three geographic levels (Analysis Area, Management Area, and Compartment – See Appendix B, Table B-5).

Other Alternatives Not Considered

Section 2.3 of the EA disclosed three alternatives I considered but eliminated from detailed study. Since they were not considered in detail in the EA, they were not considered in the range of alternatives for my decision.

Public Involvement

The proposal was listed in the January, April, July, and October 2007 editions of the Schedule of Proposed Actions (SOPA). A scoping package explaining the Macedonia Project was mailed to over 149 members of the public on August 21, 2007. An

open house meeting was hosted by USDA Forest Service employees on September 4, 2007, at the Balsam Grove Community Center/Fire Hall to provide information and receive comments from members of the public. Eighteen members of the public provided written comments during scoping. Using comments received from the public, agencies, and organizations during this period as well as internal review, the interdisciplinary team (IDT) developed a list of issues to address.

Pursuant to 36 Code of Federal Regulations (CFR) 215.6(a)(1)(i) and 215.6(a)(1)(iv), the proposal was provided to the public for a 30-day notice and comment period that began on November 30, 2007, and ended on December 31, 2007 (see Appendix H below).

Finding of No Significant Impact

After considering the environmental effects described in the EA, I have determined that these actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared. I base by finding on the following:

1. My finding of no significant environmental effects is not biased by the beneficial effects of the action (Section 2.2.3, Chapter 2, and Appendix E).
2. There will be no significant effects on public health and safety and implementation will be in accordance with project design features (Section 2.4 Chapter 2 and Appendix F).
3. There will be no significant effects on unique characteristics of the area, because there are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas in the project area, nor are there local law or requirements imposed for the protection of the environment (Section 3.11, Chapter 3).
4. The effects on the quality of the human environment are not likely to be highly controversial because there is no known scientific controversy over the impacts of the project (Sections 3.1.2, 3.2.1.2, 3.3.3, 3.4.2, 3.5.3, 3.6.2, 3.7.4, 3.8, 3.9, 3.10.4, and 3.11.2, Chapter 3).
5. We have considerable experience with the types of activities to be implemented. The effects analyses shows the effects are not uncertain, and do not involve unique or unknown risk (Sections 3.1.2, 3.2.1.2, 3.3.3, 3.4.2, 3.5.3, 3.6.2, 3.7.4, 3.8, 3.9, 3.10.4, and 3.11.2, Chapter 3).

6. The action is not likely to establish a precedent for future actions with significant effects, because the project is site specific and effects are expected to remain localized and short-term (Sections 3.1.2, 3.2.1.2, 3.3.3, 3.4.2, 3.5.3, 3.6.2, 3.7.4, 3.8, 3.9, 3.10.4, and 3.11.2, Chapter 3).
7. The cumulative impacts are not significant (Sections 3.1.2.4, 3.2.1.2, 3.3.3, 3.4.2, 3.5.3, 3.6.2, 3.7.4, 3.8, 3.9, 3.10.4, and 3.11.2, Chapter 3; and Appendix A).
8. The action will have no effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (Section 3.6, Chapter 3). The action will also not cause loss or destruction of significant scientific, cultural, or historical resources (Section 3.6, Chapter 3). A heritage report was completed for this project and copies of it were provided to the State Historic Preservation Office (SHPO) and the Eastern Band of the Cherokee Indians Tribal Heritage Protection Office (THPO) in late February 2008. On April 9, 2008, SHPO confirmed with the report's conclusions.
9. A Biological Evaluation (BE) was completed for this project on November 14, 2007, and was included within the EA that was provided to members of the public and the U.S. Fish and Wildlife Service (USFWS) on November 30, 2007. The USFWS concluded on December 13, 2007: *Based on the information provided in the Environmental Assessment and a review of our records, we concur with your assessment that none of the proposed alternatives will affect federally listed endangered species or critical habitat. Thus, the requirements of section 7(c) of the Act are fulfilled.*
10. The action will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA. The action is consistent with the Nantahala and Pisgah National Forests Land and Resource Management Plan Amendment 5 (Sections 1.1.1 and 1.3.1, Chapter 1).

Findings Required by Other Laws and Regulations

My decision to implement the Selected Alternative is consistent with the intent of the long-term goals and objectives listed on pages III-1 and III-2 of Forest Plan Amendment 5. The project was designed to meet land and resource management plan standards

and I believe it incorporates appropriate land and resource management plan guidelines.

Administrative Review and Contacts

This decision is subject to appeal pursuant to 36 CFR 215.11. A written appeal, including attachments, must be postmarked or received within 45 days after the date this notice is published in *The Asheville Citizen-Times*. The Appeal shall be sent to:

National Forests in North Carolina
ATTN: Appeals Deciding Officer
160-A Zillicoa Street
Asheville, North Carolina 28801

Hand-delivered appeals must be received within normal business hours of 8:00 a.m. to 4:30 p.m. Appeals may be faxed to (828) 257-4263 or mailed electronically in a common digital format to: appeals-southern-north-carolina@fs.fed.us.

Those who provided comments or otherwise expressed interest in a particular proposed action by the close of the comment period may appeal this decision (as per the recent *The Wilderness Society v. Rey* ruling). Appeals must meet content requirements of 36 CFR 215.14. For further information on this decision contact Michael Hutchins, Pisgah National Forest NEPA Coordinator at 828-682-6146.

Implementation Date

As per 36 CFR 215.9, if no appeal is received, implementation of this decision may occur on, but not before, the 5th business day following the close of the appeal-filing period (215.15). If an appeal is filed, implementation may occur on, but not before the 15th business day following the date of appeal disposition.

1st Randall Burgess

RANDALL BURGESS
District Ranger
Pisgah Ranger District

6-18-08

Date

APPENDIX H – RESPONSE TO COMMENTS FOR THE MACEDONIA PROJECT ENVIRONMENTAL ASSESSMENT

General Discussion

Pursuant to 36 Code of Federal Regulations (CFR) 215.6(a)(1)(i) and 215.6(a)(1)(iv), a formal 30-day Notice and Comment period for the Macedonia Project Environmental Analysis (EA) began November 30, 2007, and ended on December 31, 2007; six members of the public provided comments or expressed interest in the proposal during the Notice and Comment period.

To meet requirements at 36 CFR 215.6(b), the Agency is listing each respondent and their comments along with the Agency response. The following individuals provided comments on the EA:

- Commenter 1: Dave McHenry, North Carolina Wildlife Resources Commission (NCWRC)
- Commenter 2: Brian Cole, USDI Fish and Wildlife Service (USFWS)
- Commenter 3: Rex Galloway
- Commenter 4: Charles Parris
- Commenter 5: Dianne Riggs
- Commenter 6: H. Gerald Owen

Letter 1 – Dave McHenry, NCWRC

Comment 1-1

The Commission supports this project and would like to see it implemented. Quality early successional habitat is needed on National Forests in western North Carolina and this project would provide some. The Commission supports the proposed site preparation work and timber stand improvement proposals. They should aid with establishment of young oak stands and improve future hard mast production.

Agency Response

Comment is noted. The proposal was designed to meet the project's purpose and need as disclosed in Section 1.3, Chapter 1.

Comment 1-2

There is illegal ATV access in the area and it will likely continue without increases in enforcement efforts. Although the Commission supports establishment of the linear wildlife openings, the agency is also concerned with the possible loss of this habitat type if ATV use on this roads is not controlled. Future maintenance of linear wildlife openings in this area by Commission personnel will be extremely difficult if this activity is not curbed.

Agency Response

Unauthorized ATV use is occurring, mostly due to the highly fragmented nature of National Forest System (NFS) lands and private lands in the area. Agency employees and law enforcement will work diligently to reduce the amount of unauthorized ATV use. Alternative 2 proposed additional early successional habitat, but was eliminated from detailed study because the current level of unauthorized ATV use would reduce the effectiveness of the developed habitat (Section 2.3.2, Chapter 2).

Comment 1-3

Although we are disappointed to see no proposals for prescribed burning in the project area, we appreciate that there may be limited opportunities because of the close interspersed with private property or the lack of suitable sites for fire line establishment.

Agency Response

Prescribed burning was an alternative considered but eliminated from detailed study (Alternative 1). It was eliminated from detailed study because prescribed burning is not necessary to meet the purpose and need for the proposal. A separate analysis could be completed in the future that authorizes prescribed burning (Section 2.3.1, Chapter 2).

Comment 1-4

The stream stabilization work should improve aquatic habitat for trout. However, whenever stream stabilization work is considered, the Commission cautions the USFS to balance the adverse effects of construction work on riparian habitat with the expected, direct improvements to aquatic habitat. In some cases, access to and grading along streams with heavy equipment can cause considerable riparian disturbance and vegetation removal that may harm terrestrial and aquatic habitats more than the long-term improvements anticipated with the stabilization work. Where this may be a concern, low impact approaches and techniques such as hand tool and small machinery use is recommended to limit the riparian damage from construction.

Agency Response

Any short-term fluctuations (a season or less) in sediment would be out weighed by the improvements made with this proposal. Tucker Creek, at the locations of the stream restoration, has a lack of large woody debris. Large woody debris provides habitat for aquatic species and stabilization for stream banks. Stabilization of stream banks prevents on-going sources of erosion from filling in interstitial space which is valuable for aquatic organisms. Reconnection with the floodplain will be another benefit of this project. This is important not only for the hydraulics of a stream but also for the terrestrial organisms that thrive in riparian areas. The Forest Hydrologist designed this proposal to provide maximum benefits with the least amount of disturbance possible. This task will require hand tools or a small machine (Dingo, Bobcat, etc.) to accomplish.

Letter 2 – Brian Cole, USFWS

Comment 2-1

We are pleased to see that the Tucker Creek stream stabilization work is included in all of the action alternatives. As stated in our earlier letter, we believe actions to repair ongoing environmental degradation should be of high priority and should be considered separately from timber sales, recreation improvements, etc. We are also pleased to see that the US Forest Service (USFS) is considering the removal of the impoundment on the tributary to Tucker Creek (Alternative C).

Agency Response

The stream enhancements were included with the timber proposal because resource specialists identified the need during early project preparation. Since they would be surveying the area for the timber proposal, it was more efficient/economical to analyze the stream enhancements with the other proposals.

Comment 2-2

We have some concerns with the conversion of unauthorized (nonsystem) roads to Forest Service Roads (typically Traffic Level D Roads). After reviewing the Roads Analysis Report (RAP) for the Macedonia Project, we believe several unauthorized roads should be permanently closed. Pages 7 and 8 in the RAP detail a list of 12 unauthorized roads (labeled A through L) in the project area but recommended the decommissioning of only 3 of those roads (E, K, and L), despite the problems associated with several of them (illegal ORV use, erosion, placement in riparian habitat, etc.). We agree with the closing of Roads E (because of its proximity to a stream and the illegal ORV use), K, and L, and strongly recommend

decommissioning Roads G and H. Road H should be closed for reasons similar to road E (illegal ORV use and the associated erosion). Because Road G has not been needed previously, is currently unauthorized, and would require construction to meet USFS road standards, we see little need to authorize it.

Agency Response

The RAP identified the current system and non-system roads in the Macedonia area. System and non-system roads were developed many years ago to access the area, primarily for timber harvesting. The area is identified as MA 3B in the Forest Plan, which emphasizes providing a sustainable supply of timber. As the RAP disclosed on pages 15-17, of the 12 non-system roads in the area, nine are needed for long-term timber management and three are not. The three roads are suitable for decommissioning following separate biologic and archaeological reviews.

The Macedonia Church Project Level Roads Analysis Process (RAP) identified classified (system) and unclassified (non-system) roads associated with specific projects identified within in the scope of the environmental analysis. Classified roads identified in the Macedonia Church Project RAP consist of Federal, State, Private and Forest Service System roads. Classified Forest Service Roads are those constructed by the US Forest Service in years past for specific project to access lands suitable for timber management. Unclassified roads within the project area are primarily roads that existed at the time the land was acquired by the US Forest Service. Roads on the Forest's transportation system needed for long-term management would have erosion problems corrected during general road maintenance. Roads closed by gate are seeded following forest management activities.

The Macedonia Church Project Area is located within Management Area 3B (MA 3B) of the Land and Resource Management Plan (Forest Plan) Amendment 5. For MA 3B General Direction for Road Planning Construction and Maintenance on page III-76 specifies: *1. Plan and construct the transportation system to provide access for timber.* General Direction Standards specify: a. *Plan the road system to progressively access all lands suitable for timber production.* b. *Locate all roads on stable locations to protect adjacent resources, and to most cost effectively serve access needs.*

Following direction given in the Forest Plan the Macedonia Church RAP identified unclassified roads that meet the above Forest Plan direction and standards and recommended they be put onto the Forest Road System. Roads that did not meet Forest Plan standards were recommended for decommissioning. This process identified 12 unclassified roads of which nine were found to meet Forest Plan Direction and three that did not. The three roads that did not meet Forest Plan direction were recommended for decommissioning. Although Roads G and H did have some of the same problems associated with the three roads recommended for decommissioning they were minor and could be corrected to meet Forest Road Standards as stated in the Forest Plan.

Road G is needed to access stand C116S05 for harvest this entry. It would also provide future access to stands C116S04, C116S03, C111S06, and C117S05. Current condition of Road G is stable with no erosion or unauthorized use. Only problem needing correction is where Road G intersects with Road F, in a dry, broad ephemeral drain. To bring Road G up to standard the intersection will be rerouted from the ephemeral drain and intersect Road F on a nearby ridge. This minor action would bring Road G up to Forest Plan Standards while providing long-term access for management of the previously listed stands.

Road H was recommended by the Macedonia Church Project RAP to be added to the Forest Road System since it is needed to access stand C115S03 this entry and would provide future access to the following suitable stands: C116S11, C115S03, C115S11, and C115S13. Currently Road H has some unauthorized ORV activity on it emanating from private land along Long Branch. Putting Road H onto the system would allow for legal closure of the road where the unauthorized ORV traffic emanates and would provide for resources to bring the road up to Forest Standards with proper grade, water control and vegetation which will correct any current erosion problems.

Roads H and G would be maintained on a 10 year schedule with funding from future timber sales. Between 10 year entries, the roads would be closed to public vehicular traffic, seeded, and allowed for woody vegetation to grow on the road prism until needed in the future.

Comment 2-3

We have no major objections to the preferred alternative (Alternative C). However, we encourage you to look for ways to minimize the number of roads to be constructed and urge you to decommission roads whenever possible. If the removal of the dam on Tucker Creek were included, Alternative D would be our preferred alternative because it would result in the construction of fewer roads.

Agency Response

As the RAP disclosed in pages 15-17, of the 12 non-system roads in the area, nine are needed for long-term timber management and three are not. The RAP also disclosed the need for developing about 0.7 miles of new system road to ensure adequate access for timber management. The RAP identified three non-system roads (E, K, & L) for decommissioning.

Comment 2-4

Based on the information provided in the Environmental Assessment and a review of our records, we concur with your assessment that none of the proposed alternatives will affect federally listed endangered species or critical habitat. Thus, the requirements of section 7(c) of the Act are fulfilled.

Agency Response

Comment is noted.

Letter 3 – Rex Galloway

Comment 3-1

It seems to me that you all have studied the project area and that you have decided this would be a help to the Forest, wildlife, and our future overall condition of everything involved. My firm belief is that you are the forest expert and that the public should accept your decision. But I think if you have another alternative I think Alternative C because it is the closest to B. But after reading all the information I think B is best.

Agency Response

Preference for Alternative B is noted. The proposal was developed to meet the project's purpose and need (Section 1.3, Chapter 1). Two action alternatives analyzed in detail (Alternatives B & C) meet the purpose and need to varying degrees (Alternative D does not meet Forest Plan standards for early-successional habitat). See Decision and Rationale sections above in the decision notice for the selected alternative, why it was selected, and why other alternatives considered in detail were not selected.

Letter 4 – Charles Parris

Comment 4-1

In reference to the memo regarding the EA for Macedonia Project on the Pisgah Ranger District, I strongly suggest that we stay with the proposed alternate B. Wildlife has not been managed as it should over the past few years and with alternate B there is more wildlife habitat improvements. In reference to plan C, I believe that the roads will help stop the wildfires and for emergency uses only. In the event that plan C is chosen, I do believe that some good would come out of the plan, but the benefits would be of no comparison as plan B. High standards for water quality should remain as a high priority as it has been in the past for either plans.

Agency Response

Preference for Alternative B is noted. The proposal was developed to meet the project's purpose and need (Section 1.3, Chapter 1). Two action alternatives analyzed in detail (Alternatives B & C) meet the purpose and need to varying degrees (Alternative D does not meet Forest Plan standards for early-successional habitat). See Decision and Rationale sections above in the decision notice for the selected alternative, why it was selected, and why other alternatives considered in detail were not selected.

Letter 5 – Dianne Riggs

Comment 5-1

Old Growth Areas: Most of the old growth areas designated in the Macedonia Project proposal C, are adjacent to private land holdings or on steep slopes. Proximity to private land often means disturbance, ability for dispersal of invasive non-native species, noise contamination, contaminated water run-off, and human activity, all of which are injurious to the old growth forest and the animals needing this kind of environment (for instance, black bears). Steep slopes often preclude biodiversity, attracting sameness of species (in the case of old growth designates in 115 and 126 laurel and rhododendron associated species). What are needed in the chain of old growth areas required by law are the inclusion of rich coves, especially those with wide, moist (not wet) areas and soils that would attract species such as beech and its associates not only oaks and hickories, as well as a diverse forest population of understory and plants and fungi, bacteria, etc., which would in turn attract a greater multitude of all forms of animals.

Agency Response

The Macedonia project area is fragmented with private/National Forest System (NFS) lands, especially in Compartments 111 and 117— it is difficult to find areas not bordered by private lands. Small patch old growth proposed in Compartments 116 and 126 do not border private lands. The Forest plan states on page III-26: *The desired future condition for old growth across the forest is to have a network of small, medium, and large sized old growth areas, representative of sites, elevation gradients, and landscapes found in the Southern Appalachians and on the Forests that are well dispersed and interconnected by forested lands.* The Forest Plan also states on page III-27: *The purpose of the small patches is to increase biological diversity and provide structural components or old growth at the stand and landscape levels.* Forest Plan standards were adhered to when designating small patch old growth communities.

Comment 5-2

Invasive Species of Non-native Plants: While many non-native species are very troublesome, especially multi-flora rose, I would like to focus on oriental bittersweet as an extremely vicious and aggressive invader. This plant is a far greater problem than it was 20 years ago in the National Forest. It is much more wide-spread and with a greater number of origination sites available for transport into currently non-infected areas. Vectors of contamination unfortunately include timber harvesting equipment, ATVs, horse hooves, hiker boots as well as local animals. Since its favored area of establishment is open areas, every disturbed road and harvesting site will be a perfect launching pad for additional communities of oriental bittersweet. Unfortunately it does not remain in these areas, but presses into non-disturbed forests, killing mature trees within 10 years or less as well as preventing stump sprouts and young seedlings from growing back. Prevention of this requires aggressive human action including both mechanical and chemical means. It is necessary for all areas designated for harvesting and the roads to accomplish this harvest, be treated before entry and for 5 to 10 years afterwards to prevent new establishment of oriental bittersweet communities on these sites. It would also be advisable to clean (with pressure hoses) logging vehicles before entry into areas to be logged, most especially those that are to be gated off to future vehicular use. I believe that all costs for doing this will be easily off-set, by the saving of standing timber and new seedlings, for future use. Unfortunately, the rapid progression of oriental bittersweet is not a linear increase, but an exceptional one.

Agency Response

The Agency is aware of the damage bittersweet can and is causing on the Pisgah NF. The Macedonia proposal disclosed: *Control/manage populations prior to disturbance on FS lands* (Table 3-7, Chapter 3); and

further disclosed: *Control/manage existing non-native invasive plant species along haul routes and haul routes adjacent to existing and proposed harvest stands with herbicide. Prior to harvest, treat non-native invasive plants along FSRs adjacent to harvest stands with herbicides and/or manual methods* (Table 2-3, Chapter 2). The Agency plans to monitor the specific areas as disclosed in Section 2.4.2, Chapter 2: *Areas would be identified to monitor control efforts as part of our efforts to meet national objectives of reducing impacts from invasive species and improving the effectiveness of treating selected invasive species on the Nation's forests and grasslands. Survey areas would be identified before treatment, checked during treatment, and after treatment. A post-treatment evaluation report would be completed and filed in the project file. Based on the monitoring results, follow-up treatments may be needed to meet objectives.* Pressure washing logging equipment can be a costly requirement that reduces potential for timber companies to bid on a proposal. The need for this requirement has not been determined to be necessary due to the pretreatment proposed and the monitoring planned. The cleaning of logging equipment and vehicles is required in the BT Division of the Timber Sale Contract., under BT 6.35 Equipment Cleaning. This sale contract clause requires that all logging equipment be inspected prior to moving Off-Road Equipment onto the sale area and the Purchaser shall advise the Forest Service of its cleaning measures and make equipment available for visual inspection by the Forest Service prior to entering a sale area.

Comment 5-3

Road Construction. Advise lower road mileage added to the Forest transportation system. Costly to maintain.

Agency Response

The proposal developed and analyzed several alternatives in detail. Alternative A (No-action) did not propose any additional road activities. Alternative B proposed the most road work (5 miles of reconstruction, 0.7 miles of new system construction, 3.1 mile of non-system road added to the Forest transportation system, and 1 mile of temporary road) because it proposed the most harvesting. Alternative C proposed less road work than alternative B (5 miles of reconstruction, 0.7 miles of new system construction, 2.5 miles of non-system road added to the Forest transportation system, and 0.8 miles of temporary road) because it proposed less harvesting. Alternative D proposed the least road work (5 miles of reconstruction, no new system construction, no non-system road added to the Forest transportation system, and 1.1 miles of temporary road) because it proposed the least harvesting. The level of road work proposed is interdependent on the level of timber managed. The Macedonia area is designated as Management Area 3B (timber emphasis) in the Forest Plan (pages III-6, III-55, and III-71) and as such roads are needed to access the area to meet Forest Plan timber objectives.

Comment 5-4

Additional Areas of Old Growth Designation: I would like to recommend, in accordance with what I wrote above under "old growth" that the Pisgah Ranger District add two areas to its old growth designation in the Macedonia Project. These are the entire Spice Cove watershed and the upper end of Long Branch. Both of these are in Compartment 115. Spice Cove would be excellent black bear habitat as it is remote, not next to private lands, has varied terrain, and has multi-directional facing slopes, favoring differing plant communities. Long Branch contains beech communities, which would add another needed dimension to tree/plant/animal diversity. It is up-stream to private lands.

Agency Response

One of the purpose and need items for the project is to designate small patch old growth. The EA stated in Section 1.3, Chapter 1: *There is a need to designate small patch old growth communities in Compartments 111, 115, 116, 117, and 126 because no small patch old growth communities are currently designated in them.* Compartment 115 needs at least 56 acres of small patch old growth designated within it to meet Forest Plan standards, and the proposal (73 acres) exceeds this amount by 17 acres. Within all five compartments the proposal needs to designate at least 268 acres of small patch old growth, and all action alternatives proposed 338 acres, which exceeds the Forest Plan amount by 70 acres. The areas identified for small patch old growth designations (by an interdisciplinary team that included botanical, wildlife, silviculture, scenery,

archaeological, fisheries, and hydrologic expertise) were located where they are because they met old growth Forest Plan standards and they represent the natural communities within the analysis area. Old growth is proposed in the Spice Cove area. The Long Branch area is fragmented with private lands, reducing its suitability for old growth designation. Designating additional acres of small patch old growth in any of the five compartments is not necessary to meet Forest Plan standards (see also Section 2.3.4, Chapter 2 of the EA). The Macedonia project area is within Management Area 3B, which is designated as suitable for timber harvesting while providing early successional habitat for wildlife species such as white-tailed deer, ruffed grouse, and wild turkey. There are other management areas on the Pisgah Ranger District and Pisgah National Forest (MAs 2C, 4C, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, and 17) that are more appropriate and available to provide old growth habitat for species that prefer older-aged forests.

Letter 6 – H. Gerald Owen

Comment 6-1

Having grown up hunting, fishing, biking, and camping in the Macedonia Silverstein area and still own property in the area, I strongly support your proposed Macedonia project.

Agency Response

Comment is noted.