



United States
Department of
Agriculture

Forest
Service

National Forests in North Carolina
Pisgah National Forest
Appalachian Ranger District

PO Box 128
Burnsville, NC 28714-0128
828-682-6146

File Code: 1950-1

Date: August 7, 2008

Dear Interested Citizen:

I have signed the Decision Notice (DN) and Finding of No Significant Impact (FONSI) for the Shinwhite Environmental Assessment (EA) within the Appalachian Ranger District, Mitchell and Yancey Counties. The DN discusses in detail my decision and rationale for reaching it. Copies of the DN and FONSI are enclosed.

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/ Tina R. Tilley
TINA R. TILLEY
District Ranger

Enclosure





United States
Department of
Agriculture

Southern Region
Forest Service

August
2008



Shinwhite

Decision Notice

And

Finding Of No Significant Impact

Appalachian Ranger District, Pisgah National Forest
Mitchell and Yancey Counties, North Carolina

Decision Notice
& Finding of No Significant Impact

Shinwhite Project

USDA Forest Service
Appalachian Ranger District, Pisgah National Forest
Mitchell and Yancey Counties, North Carolina

Decision and Rationale

Decision

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

- Harvest about 74 acres using the two-age regeneration harvest prescription (20-25 ft² basal area retained per acre). Harvesting will include developing about 3 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 will be used where available. Skid roads and log landings will 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 will be disked and seeded with an appropriate seed mix to reduce potential for sedimentation and compaction (including the partially harvested portion of Stand 65-6). Skid trails will be used where appropriate, but are different than skid roads because they do not have a blade used to cut into the soil – see definitions at end of Appendix A of the EA.
- Site prepare and the subsequently release, if needed with herbicide (Triclopyr) in all two-age stands harvested;
- Designate 70 acres of small patch old growth in compartment 65 and 54 acres of small patch old growth in compartment 68 (both designations are from the initial old growth inventory);
- Use Imazapic herbicide to eradicate fescue component within existing wildlife fields containing fescue, then refurbish the fields by using a clover/warm season grass mix, lime, and fertilizer. Within all existing fields, control other non-native invasive plants and daylight around existing fields to develop a brushy interface. Existing fruit trees in wildlife openings will be “released” and autumn olive will be eliminated in all existing fields and replaced with native soft mast species (i.e., spicebush, serviceberry, and/or dogwood). All landings constructed for harvest activities will be seeded following harvest with a clover and wildflower seed mix and on smaller landings, an old variety species of apple or other fruit trees will be planted.
- Improve wildlife habitat: (1) Develop two new wildlife fields near Beauty Spot (about 4 acres) that meet scenery standards. (2) Within existing wildlife fields containing fescue, use Imazapic herbicide to eradicate fescue component then refurbish the fields by using a clover/warm season grass mix, lime, and fertilizer. (3) In addition within existing fields control/manage non-native invasive plants with herbicides (Triclopyr and Glyphosate). Existing fruit trees in wildlife openings will be “released” and autumn olive will be eliminated in all existing fields and replaced with native soft mast species (i.e., spicebush, serviceberry, and/or dogwood). (4) All landings constructed for harvest activities will be seeded following harvest with a clover and wildflower seed mix and on smaller landings, an old variety species of apple or other fruit trees will be planted. (5) Daylight an average of 30 feet either side of Forest Service Road (FSR) 5572, and Lewis Trail for about 3.5 miles (about 25 acres) to develop a brushy interface. (6) Daylight the following existing wildlife fields: Bearwoods (only eastern ½), Lewis Trail (USFS landscape architect to review during leaf-off), Devil’s Creek Gap (USFS landscape architect to review during

leaf-off), White Oak Creek, Annie's Cove, Beauty Spot (NCWRC), and Chestnut Mountain. (7) Daylighting will not occur along the first $\sim\frac{1}{2}$ mile of FSR 5506 and on the west side of the last $\sim\frac{1}{4}$ mile to ensure the visual integrity of the corridor is protected. Daylighting will occur 30 feet along either side between these two sections and 10-30 feet along the east side of the road on the last $\sim\frac{1}{4}$ mile section (see 6/9/08 scenery simulations, project record). An USFS landscape architect will review and/or assist in the marking of timber along this road. Daylighting will not occur within existing harvest units and stream protection zones;

- Use herbicides (Triclopyr and Glyphosate) to control non-native invasive plants along Forest Service roads, trails, and historic routes within the analysis area (AA). Prior to harvest, treat non-native invasive plants within harvest stands with herbicides (Triclopyr and/or Glyphosate) or manually as appropriate; and
- Implement a soil and water improvement project near Indian Grave Gap to rehabilitate existing impacts to resources caused by equestrian use.

My decision is based on a review of the record that shows a thorough analysis of relevant scientific information and a consideration of responsible opposing views.

Modification to Alternative C

Following initial implementation of the timber contract in fall 2007 it became evident that a scenery buffer along the existing easement road through Stand 65-6 would be necessary. This scenery buffer would not facilitate harvest activities in the remaining approximately 24 acres of the stand and access to the remaining acreage would have to occur outside of the stand. In reviewing potential access, it was clear that the only suitable access was south of the stand; however, there is an important archaeological site that could be damaged by using this access as well as potential impacts to a perennial stream that would need to be crossed. As a result, I have decided to drop Stand 65-6 from harvesting at this time to ensure resources in the area are protected. My decision to drop this stand from harvesting at this time was reached after review of the comments received during the Notice and Comment period, a review of the effects analyses and surveys completed by the interdisciplinary team members, and a thorough review of the stand in the field. The

existing skid road, trails, and log landing within this stand developed last year will be rehabilitated consistent with all other post-harvest activities (see Section 2.2.3, Chapter 2).

Rationale

The purpose and need for the proposal is disclosed in Section 1.4, Chapter 1 and listed below:

- Balancing age-class distribution. Forest Plan standards provide for developing up to 15% early successional habitat (0-10 year age-class) in compartments with Management Area 3B lands designated within them (Forest Plan, page III-31). Currently, the percent of 0-10 age-class is 0% in Compartment 65; 10% in Compartment 68; 3% in Compartment 69; and 7% in Compartment 70.
- Improving timber stand conditions and providing for a continuous supply of timber. The last appreciable entry in the project area was about eight years ago (Sunshine Timber Sale, 98 acres).
- Reducing competition and improving species composition in proposed harvest units through herbicide use.
- Controlling non-native invasive species through herbicide use along existing roads and trails, and historical routes. Currently non-native invasive species are established in the project area.
- Improving conditions for wildlife by creating a diversity of habitat and maintaining and enhancing existing fields. Currently, there is about 1% grass/forb in the 9,709 analysis area and Forest Plan standards state to use a desired density of 3% for permanent grass and forb openings (Forest Plan, page III-84).
- Improving water quality by rehabilitating or relocating away from areas of resource damage caused by equestrian use. Currently, existing equestrian use is impairing water quality. Forest Plan direction is to emphasize the protection of all developed stream channels and to protect the integrity of intermittent and ephemeral stream channels, including their banks and beds (Forest Plan, page III-40).

I believe the Selected Alternative will move resources in the project area towards the desired future condition, better achieving the purpose and need for the project while addressing public concerns (see Appendix G below).

In reaching my decision, I began by once again reviewing the purpose and need for the project and

all of the alternatives presented in the EA. I then carefully weighed the effects analyses of the alternatives analyzed in detail and the public comments received on the EA. The Shinwhite 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 Shinwhite proposal. I believe they provided me sufficient analyses and conclusions to make a reasoned decision.

My decision will eliminate autumn olive (a non-native invasive plant) established within current wildlife fields and will plant a suitable native species in its place (i.e., spicebush, serviceberry, and/or dogwood). I believe it is important to take efforts that reduce further potential for non-native invasive species to become and remain established on National Forest System lands—removing Autumn olive in the Shinwhite project area is an important way to move forward in this direction.

I believe my decision adequately addresses public safety in relation to access management in the White Oaks area. Concerns have been raised by residents in the White Oaks area that Forest Service Road 5570 was unsafe for year-round travel and could be made impassable during harvest operations. The Forest Engineer reviewed the road and determined it was properly designed for its intended use. I anticipate there may be reasonable delays caused during harvest operations, but with proper application of timber sale contract clauses, access will be maintained (see also Section 3.10.3, Chapter 3; Appendix F; and project record).

My decision does not authorize a land exchange between the USDA Forest Service and private landowners because this was outside the scope of this project. A proposal for a land exchange was provided during the Notice and Comment period; the Agency is currently reviewing this proposal and will make a determination under a separate analysis.

Other Alternatives Considered

In addition to the Selected Alternative, I considered two other alternatives in detail: Alternative A – No

Action and Alternative B – Proposed Action. A comparison of these alternatives can be found in Section 2.5, Chapter 2.

Alternative A – No Action

Under Alternative A, current management plans, such as existing wildlife management, wildfire suppression, general road maintenance, and special use authorization operations, would continue to guide management of the project area (see Section 2.2.1, Chapter 2). I did not select this alternative for several reasons. This alternative would not have provided habitat conditions for wildlife species; improved stand conditions and provided a continuous supply of timber; designated small patch old growth, nor used herbicides to control/manage pest populations. I believe active management is needed to move the area towards the Forest Plan's desired future condition.

Alternative B – Proposed Action

Under this alternative about 83 additional acres of two-age harvest and site preparation, and about 0.1 miles of temporary road construction would have occurred when compared to the Selected Alternative—all other actions are the same as the Selected Alternative. I did not select this alternative because I believe the project's objectives can still be achieved without harvesting the additional 107 acres of two-age harvest and the temporary road construction. Potential adverse impacts to resources in the area are reduced under the Selected Alternative when compared to the Alternative B.

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 2006 and January 2007 editions of the Schedule of Proposed Actions (SOPA). The proposal was provided to the public, agencies, and organizations for comment during scoping from December 9, 2005, thru January 9, 2006—fourteen individual comments were received during scoping and a petition was submitted by 32 local residents

opposed to the proposal. On February 21, 2006, members of the Appalachian Trail Conservancy and the Tennessee Eastman Hiking Club met in the field with Forest Service employees to discuss the proposal and potential effects to the Appalachian Trail. On June 19, 2006, Forest Service employees met with landowner's who own property adjacent to the project area to discuss aspects of the proposal. A formal 30-day Notice and Comment period for the Shinwhite Project EA began July 21, 2006, and ended on August 21, 2006. Eight timely letters or e-mails were submitted by members of the public during this comment period.

On September 28, 2006, District Ranger Paul Bradley signed a decision notice (DN) to implement Alternative C; the DN was mailed to those who commented during the 2006 30-day Notice and Comment period. On November 20, 2007, District Ranger Tina Tilley withdrew the September 28, 2006, DN to ensure concerns related to harvesting were adequately addressed. At that time, about four acres of Stand 65-6 was harvested and about 700 feet of skid road was completed. On March 17, 2008, a scoping notice was mailed to interested members of the public outlining a new proposal for Shinwhite with a formal 30-day Notice and Comment period being initiated on April 1, 2008. This comment period was completed on May 1, 2008, with seven members of the public providing timely comments.

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 my 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 3 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; Sections 3.4 and 3.10 Chapter 3; 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, 3.2.2, 3.3, 3.4.2, 3.5.2, 3.6.2, 3.7.3, 3.8, 3.9, and 3.10.4, Chapter 3).
5. We have considerable experience with the types of activities to be implemented. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk (Sections 3.1.2, 3.2.2, 3.3, 3.4.2, 3.5.2, 3.6.2, 3.7.3, 3.8, 3.9, and 3.10.4, 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, 3.2.2, 3.3, 3.4.2, 3.5.2, 3.6.2, 3.7.3, 3.8, 3.9, and 3.10.4, Chapter 3).
7. The cumulative impacts are not significant (Sections 3.1.2.5, 3.2.2, 3.3, 3.4.2, 3.5.2.2, 3.6.2, 3.7.3.3, 3.8, 3.9, and 3.10.4 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 3.7, Chapter 3). A heritage report was completed for this project and mailed to the State Historic Preservation Office (SHPO) on August 24, 2006. No concerns have been identified.
9. The 2006 Biological Evaluation (BE, Appendix A) was updated for this project on June 12, 2008, that concluded: *No T&E species or their habitat is known to occur in or near enough the proposed activities to be affected by this proposal. There is no occupied or unoccupied habitat recognized as essential for listed or proposed species recovery, or to meet Forest Service objectives for S [sensitive] species. Formal consultation with the USDI Fish and Wildlife Service is not required.*
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, 1.2, and 1.4, 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 incorporates appropriate land and resource management plan guidelines (Sections 1.1, 1.2, and 1.4, Chapter 1).

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 formal notice and 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 Ted Oprean, Project Leader, at 828-877-3350 or Michael Hutchins, Team Leader 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.

/s/ Tina R. Tilley

TINA R. TILLEY
District Ranger
Appalachian Ranger District

8/7/08

Date

**APPENDIX G – RESPONSE TO COMMENTS
FOR THE
SHINWHITE PROJECT
30-DAY NOTICE & COMMENT PERIOD**

General Discussion

The 30-day Notice and Comment period for the Shinwhite proposal was initiated on April 1, 2008, and was completed on May 1, 2008—seven members of the public provided timely comments during this period. The comments received and Agency responses are listed below.

COMMENT TRACKING SHEET

Proposal

Shinwhite

Date:

6/11/08

Comment Specific comment raised by members of the public	Source(s) of Issue Who raised it?	Agency Response
1-1: In your letter of March 17, 2008, you requested our comments on the subject project. We previously commented on this project in letters dated January 4, 2006, and August 16, 2006. Those comments were provided in accordance with the provisions of the National Environmental Policy Act; Fish and Wildlife Coordination Act, as amended (16 U.S.C. 661-667e) and section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543). We have no further comments beyond those provided in our earlier letters.	Brian Cole (USFWS)	Comment is noted.
1-1a: (From 1/4/06 USFWS letter) Because so many federally listed and rare species are known to occur near the proposed project areas, we recommend surveying the areas for these species prior to any on-the-ground activities to ensure that no populations of rare species are inadvertently lost. Of particular concern are any impacts to the Nolichucky River or its tributaries. The federally threatened Virginia spiraea and endangered Appalachian elktoe are both found within the Analysis Area. Enclosed is a list of species for Mitchell and Yancey Counties that are on the Federal List of Endangered and Threatened Wildlife Plants and federal species of concern that may occur in the project impact area. Federal species of concern are not legally protected under the Act and are not subject to any of its provisions, including section 7, unless they are formally proposed or listed as endangered or threatened.	USFWS	Comment is noted. Adequate surveys for TES and other species would be completed prior to implementation and regardless of alternative. Federal species of concern are considered under the Forest Plan.
1-1b: (From 1/4/06 USFWS letter) The environmental document prepared for this project should contain the following information, if pertinent: 1. A complete analysis and comparison of the available alternatives. 2. A description of the fishery and wildlife resources within the project area, including any additional rights-of-way and any areas, such as borrow areas, that may be affected directly or indirectly by the proposed project. 3. The extent (linear feet as well as discharge) of any water courses that will be impacted as a result of the proposed project. A description of any streams should include the classification (Rosgen 1995, 1996) and a description of the biotic resources. 4. The acreage of upland habitat, by cover type, that will be eliminated or altered because of the proposed project. 5. A description of all expected secondary and cumulative environmental impacts associated with the proposed work. 6. An analysis of any crossing structure considered (i.e., spanning structure,	USFWS	Comment is noted. These analyses would be completed prior to implementation and regardless of alternative.

Comment Specific comment raised by members of the public	Source(s) of Issue Who raised it?	Agency Response
culvert) and the rationale for choosing the preferred structure(s). We prefer stream crossings that span the bank-full width of streams and wetlands and that do not impeded natural stream functions or fish passage.		
2-1: ATC participated earlier in comments and a field review of the project. However, it appears that we may have missed an important potential visual impact as seen from the A.T. in our earlier evaluation of the Shinwhite Project, i.e. the daylighting of FS5506, which is located on the west side of Flattop Mountain. This road is roughly parallel to the A.T. on the opposite side of the Devils Creek valley, within and just outside foreground as viewed from the A.T. and visible from a couple of open viewpoints along that stretch of the A.T. Any portion of FS5506 which is in the A.T. foreground, i.e. the A.T. management area, should not be daylighted, and any portion of daylighting visible in the A.T. middleground should meet a Visual Quality Objective of at least Partial Retention. This will be quite difficult to achieve as the tree canopy in this area is fairly uniform. We request that a visual analysis of the proposed daylighting of FS5506, as seen from the A.T. across Devils Creek Valley, be performed to assess the impacts of this proposal and determine if there is any mitigation which would allow your meeting the prescribed VQO.	Morgan Sommerville (ATC)	Daylighting will not occur along the first ~½ mile of FSR 5506 and on the west side of the last ~¼ mile to ensure the visual integrity of corridor is protected. Daylighting will occur 30 feet along either side between these two sections and 10-30 feet along the east side of the road on the last ~¼ mile section (see 6/9/08 scenery simulations completed by Landscape Architect Erik Crews). An USFS landscape architect will review and/or assist in the marking of timber along this road.
2-2: Assuming that the mitigations we agreed upon for the new wildlife openings near Beauty Spot are met, other aspects of the proposed Shinwhite Project should have no significant impact on the Appalachian National Scenic Trail or its users.	ATC	Comment is noted.
3-1: This letter on behalf of the Tennessee Eastman Hiking & Canoeing Club is in response to the revised Shinwhite project proposal described in a scoping letter dated March 17, 2008. We did not receive this scoping memo, but learned of it from Morgan Sommerville at ATC. This may have been due to our comments on the initial proposal in 2006 arriving a few days later than the due date at that time. Thanks to Michael Hutchins for pointing me to the information describing the proposal on the National Forests in North Carolina web site.	Joe DeLoach (TEHC)	Comment is noted. Mr. DeLoach and TEHC have been added to the mailing list to receive future information.
3-2: I noticed in Morgan's comments concerns about the daylighting of Forest Service Road 5506 and the visibility that could result from the AT Trail north of Devils Creek Gap. We share those concerns to the extent that we'd suggest a field trip soon, before the leaves come on the trees, to this area and view the proposed actions. I do not know whether Morgan's request for a visual analysis is a computer exercise in lieu of a field trip, but we do agree that this part of the proposal should be further investigated to ensure preservation of the Visual Quality Objective.	TEHC	See Comment 2-1 and Agency Response above. The Landscape Architect's scenery simulations were reviewed by Morgan Sommerville on June 9, 2008.

<p>Comment Specific comment raised by members of the public</p>	<p>Source(s) of Issue Who raised it?</p>	<p>Agency Response</p>
<p>There are some pretty evident viewpoints in the vicinity of where the A. T. crosses that road, Devils Creek Gap, and Trail north of Devils Creek Gap in Tennessee which would not take long to reach and which should provide confirmation of any potential visual impact. We can make volunteers available for such a trip as convenient with USFS and ATC personnel.</p>		
<p>3-3: There is also mention in the proposal about daylighting several wildlife fields. Two mentioned and shown on the maps as being close to the A. T. are the Lewis Trail and Devil's Fork Gap. The latter must be Devils Creek Gap, as depicted on the map while the memo states Devil's Fork Gap. The map indicates that this is an open area along Forest Service Road 278, very close to the Trail crossing of that road (and FSR5506). I hope that is the case, as we are not aware that Devils Creek Gap itself has been managed as a wildlife opening and do not believe that it should be. The Lewis Trail wildlife field appears to be smaller and not directly adjacent to the A. T. If these openings are where we think they are (nice to confirm on the field trip), we'd have no concerns about daylighting them.</p>	<p>TEHC</p>	<p>Comment is noted. The wildlife field is indeed the Devil's Creek Gap field not the Devil's Fork Gap and is an existing wildlife field. See Rationale under Shinwhite Decision Notice above.</p>
<p>3-4: With the prior comments from ATC and TEHCC on mitigating measures for the proposed actions near Beauty Spot, we have no concerns about other aspects of this proposal.</p>	<p>TEHC</p>	<p>Comment is noted.</p>
<p>4-1: The NCWRC is concerned about the lack of early successional habitat (ESF) on National Forest lands in western North Carolina and supports timber harvest to create this habitat type. Therefore, the NCWRC supported the original proposal to harvest about 180 acres in the project area. It is discouraging to see that Alternative C or a modified version is now being considered because it would only involve about half as much harvest as Alternative B. While, this project alternative would meet Forest Plan requirements for a minimum of 5% ESF within the compartments, it is important to note that on a regional and certainly Forest-wide basis this habitat represents much less than 5% (probably about 1%) of the Forest overall. Considering this and the high importance of ESF to game and non-game wildlife alike, the NCWRC encourages the USFS to maximize harvest opportunities during management activities.</p>	<p>David McHenry (NCWRC)</p>	<p>The proposal addresses this comment.</p>
<p>4-2: The timber thinning and release efforts will presumably promote oak and other hard mast producing trees. Like ESF, these trees are critically important to wildlife and should be actively managed for throughout the Forest.</p>	<p>NCWRC</p>	<p>Comment is noted. Thinning is not proposed; regeneration harvesting (two-age method) is.</p>

<p>Comment</p> <p>Specific comment raised by members of the public</p>	<p>Source(s) of Issue</p> <p>Who raised it?</p>	<p>Agency Response</p>
<p>4-3: The NCWRC supports the release and establishment of old variety of apple trees and control of most of the non-native invasive species listed, but remains opposed to the elimination of autumn olive as outlined in the project plan. Many hunting clubs were solicited several years ago by the NCWRC and the USFS to aid with planting autumn olive. It has proven especially attractive to bear, deer, and turkey and many hunters and bird watchers use these plantings to locate wildlife during early autumn. Its removal would reduce an already limited soft mast food source in the region. Moreover, all the tree/shrub species listed for replacing the olives are common throughout the Forest and will not prove as attractive to wildlife. And, if desired, the value of these species could be enhanced if they are released where they are presently growing.</p>	<p>NCWRC</p>	<p>Allowing a non-native invasive plant species to remain established on National Forest System (NFS) lands is inconsistent with restoring damaged ecosystems. As stated by the national headquarters for the USDA Forest Service: <i>Healthy forests make for a healthy nation. Keeping America's forests and grasslands healthy requires restoring and rehabilitating damaged areas to: (1) prevent severe wildfires, (2) stop the introduction, establishment, and spread of invasive species, (3) reduce the conversion of forest and grasslands that leads to fragmentation of rural landscapes through subdivision, and (4) manage impacts of motorized recreation vehicles by restricting use to designated roads and trails. Over the next few years, the Forest Service will restore and rehabilitate damaged lands and will actively manage critical resources. The Forest Service Strategic Plan provides a new framework for accomplishing the Agency's mission and incorporates actions to resolve four major threats to America's forests and grasslands. Forest Service leadership is committed to removing the "Four Threats" from the national landscape. This is a necessary action in order to achieve long-term outcomes: clean air, clean water, conserving wildlife, and protecting communities from wildfire. Forest Service actions to achieve these outcomes are important contributions to enhancing the quality of life for Americans: Actions needed to address the Four Threats include: Fire and fuels—Restore healthy, disturbance-resilient ecosystems on lands at risk from catastrophic fire, improving the condition and function of critically important watersheds, and sustaining critical wildlife habitat nationwide. Invasive species—Protect forest and rangeland ecosystems by preventing the release of non-native species and by controlling the spread, or eradicating, invasive species. Loss of open space—Conserve the nation's forests and rangelands most at risk due to subdivision and land conversion by working with partners, communities and landowners to balance development with sustaining ecosystem services and viable working landscapes. Unmanaged recreation—Work with partners to develop travel management plans that regulate the use of OHVs on designated roads, trails, and parks in an appropriate manner.</i> In addition, allowing a non-native invasive plant species to remain established on NFS lands is inconsistent with two Executive Orders (EO) specific to management of non-native exotic species, EO 11987 and EO 13112: Executive Order 11987: Exotic Organisms Signed May 24, 1977, <i>this Executive Order requires Federal agencies, to the extent permitted by law, to: restrict the introduction of exotic species into the natural ecosystems on lands and waters owned or leased by the United States; encourage States, local governments, and private citizens to prevent the introduction of exotic species into natural ecosystems of the U.S.; restrict the importation and introduction of exotic species into any natural U.S. ecosystems as a result of activities they undertake, fund, or authorize; and restrict the use of Federal funds, programs, or authorities to export native species for introduction into ecosystems outside the U.S. where they do not occur naturally. The Secretaries of Agriculture and Interior authorized to allow the importation of exotics and the export of native species if natural ecosystems will not be adversely affected. The Secretary of the Interior, in consultation with the Secretary of</i></p>

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		<p><i>Agriculture and the heads of other agencies, is to develop and implement regulations pursuant to the Executive Order. Executive Order 13112 of February 3, 1999 Invasive Species (Section 2. Federal Agency Duties) (a) Each Federal agency whose actions may affect the status of invasive species shall, to the extent practicable and permitted by law, (1) identify such actions; (2) subject to the availability of appropriations, and within Administration budgetary limits, use relevant programs and authorities to: (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; (v) conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and (vi) promote public education on invasive species and the means to address them; and (3) not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless, pursuant to guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions. As stated in the EA, spicebush, serviceberry, and/or dogwood would be used to replace autumn olive. The decision further explains rational for eliminating autumn olive. An alternative was considered but eliminated from detailed study that proposed to retain autumn olive. Autumn olive is an invasive species and is not proposed for retention. The NCWRC needs to identify a suitable native non-invasive species to replace Autumn olive. Alternative A meets a portion of this comment</i></p>
<p>4-4: Autumn olive tends to spread in riparian/wet sites and relatively low elevations, which is not typical of much of the project area. Containment of autumn olive has been successful in the fields where it was originally planted through annual mowing and regular field maintenance. There may be isolated areas where it has spread; those areas may need action. But, the cost and effort in removing the plant entirely would be better spent on other management efforts which would be of greater benefit to wildlife and/or focused on other exotics that are far more invasive. Moreover, elimination would result confusion by forest cooperators and in negative public relations for the USFS and NCWRC. In summary, full scale elimination of this very valuable wildlife food producing plant is not justified, reasonable, or wise with regard to potential negative impacts to wildlife and likely negative responses from sportsmen.</p>	<p>NCWRC</p>	<p>See Comment 4-3 and Agency Response above.</p>
<p>4-5: Staff supports alignment of trails outside of riparian areas and using to the extent possible bridges for stream crossings, particularly on any horse/bike trails. The Nolichucky River, which flows through the project area, supports Appalachian elktoe mussels and a diversity of other rare</p>	<p>NCWRC</p>	<p>Comment is noted.</p>

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aquatic species. Therefore, management activities and practices that improve and protect water quality in watersheds draining to the river are particularly important here.		
4-6: There is one burn unit in the project area, but prescribed burning is not included. The NCWRC recommends that this unit continue to be burned to promote ESH and herbaceous understory vegetation. Other areas where suitable fire lines exist or can be established, particularly in stands of rhododendron and mountain laurel, should be repeatedly burned as well. Incorporation of a rotating burn schedule in the project area becomes particularly important to wildlife habitat if the timber harvest is reduced.	NCWRC	Comment is noted. The Beauty Spot and Joe Berry prescribed burns would be implemented under separate NEPA analyses and decisions. They would be burned on a rotational basis.
5-1: We strongly support the proposed activities outlined in your March 17 letter as they will vastly improve this area for wildlife, provide a more balanced age-class distribution of forest structure, and provide needed wood fiber for local forest product industries. It is clear that there are opportunities through regeneration harvesting, thinning and wildlife opening development to achieve the desired conditions described in the proposal.	Steve Henson (SAMUC)	Comment is noted.
5-2: It is imperative to maintain a leave basal area at or below 20 sq.ft./acre in the two-age regeneration areas to allow for the development of quality early successional habitats for wildlife and promote a better mix of natural regeneration for future stands. We note that your target leave basal area ranges from 20-25. We encourage you to drop your target to below 20 to ensure proper stand regeneration and stem density to provide quality habitat for early succession species.	SAMUC	An alternative was considered but not in detail that proposed to reduce basal area retention below 20 ft ² per acre. Basal area retention below 20 ft ² is not necessary to meet the purpose and need. The Forest Plan provides direction on basal area retention: <i>To provide for regeneration of desired tree species, enough light must be available over a period of time for the newly developing stand. If only one entry is planned, optimum regeneration would be achieved by establishing a residual basal area as low as 15 to 20 square feet per acre, depending on the average diameter of the residual trees. In order to meet wildlife or visual quality objectives, residual basal area will be higher, as much as 50 square feet per acre</i> (Forest Plan, Appendix E).
5-3: We support efforts to develop new wildlife openings as they are very important for wildlife in the analysis area. Clearly, there is a desperate need to have wildlife openings in this area, perhaps more should be considered. We strongly urge you to also consider an early successional edge (at least 100 feet deep around the openings) that will provide cover for numerous wildlife species that could take advantage of the opening's browsing and bugging opportunities. This improvement has been applied in other areas of the Pisgah and Nantahala national forests and promoted by wildlife biologists from the NC WRC and conservation organizations. We also support daylighting all the roads in the project area, like to establish early successional/shrubby strips along the roads to allow protection for numerous wildlife species that will take advantage of the protection for access to the wildlife seeded roads (linear wildlife openings).	SAMUC	An alternative was considered but not in detail that proposed to daylight 100 feet around fields. The action alternatives have been designed to meet wildlife and scenery objectives – additional daylighting would likely have adverse impacts to the scenic resources.

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5-4: We have no problems with the construction and reconstruction of the roads necessary to carry out the proposed actions. They are assets for all management activities and provide access for many recreation activities, forest health manipulations, wildlife habitat work, etc.	SAMUC	Comment is noted.
5-5: We also support the use of herbicides in pre/post harvest, TSI activities, exotic invasive species control and other management activities. From our perspective, using herbicides on post harvest treatments is much preferred to mechanical treatments – it leaves the stems standing at least for a couple of years providing more dense cover for wildlife purposes.	SAMUC	The proposal addresses comment.
5-6: We support the proposed use of prescribed burning as a wildlife management tool. It is widely recognized by wildlife specialists the benefits of regular prescribed burning to a number of important wildlife species across the landscape. We encourage you to consider a recurring burning plan for the area.	SAMUC	See Comment 4-6 and Agency Response above.
5-7: We would also encourage you to consider clearly designating/restricting road uses (linear wildlife openings, bike riding, horseback riding, etc.) after the project is complete to reduce future conflicts.	SAMUC	The project does not propose to change existing uses of National Forest System roads. This is better addressed at the Forest-level. The proposal is consistent with Forest Plan direction for this management area (page III-55 and III-71).
5-8: In summary, we support the proposed actions but we are disappointed somewhat because of missed opportunities, such as dramatically increasing much needed early successional habitats, more wildlife openings and early succession buffers around linear wildlife openings that would create an improved proposal for the benefit of forest health and wildlife.	SAMUC	Comment is noted – see Comment 5-3 and Agency Response above.
6-1: We have conducted a review of the proposed undertaking and are aware of no historic resources that would be affected by the project. Therefore, we have no comment on the undertaking as proposed. The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation’s Regulations for Compliance with Section 106 codified at 36 CFR Part 800.	Peter Sandbeck (NCSHPO)	Comment is noted.
7-1: For reasons set out in detail below, we continue to have serious concerns about the effects this project will have on public safety, private land values, and on the environment. We therefore propose below a land exchange of certain United States Forest Service [Forest Service] lands involved in this project, for more environmentally critical waterfront lands we currently own. We believe the public interest will be better served by this proposal than the current timber proposal.	Dr Charles & Ms Charlene Thomas (CCT)	A proposed land exchange is outside the scope of the proposal and does not meet the purpose and need as described in the 3/17/08 scoping letter: balancing age-class distribution, improving timber stand conditions and providing for a continuous supply of timber; reducing competition and improving species composition in proposed harvest units through herbicide use; controlling non-native invasive species through herbicide use along existing roads and trails, and historical routes; improving conditions for wildlife by creating a diversity of habitat and maintaining and enhancing existing fields; and improving water quality by rehabilitating or relocating away from areas of resource damage caused by equestrian use. Harvesting at this time and in this area is necessary to meet the purpose and need. A separate analysis that

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		proposes a land exchange could be reviewed in the future.
7-2: The treatment area designated 65-6 on the proposed project plans is adjacent to a portion of our private property, and is burdened by the primary easement serving our property. In addition, Forest Service Road 5570 [FSR 5570], in which our easement terminates, is located in close proximity to our property. We hereby propose an exchange of those lands designated as 65-6, along with those Forest Service lands to the North of 65-6 and to the East of FSR 5570, totaling approximately 55 acres, for more valuable nearby lands owned by us along the Nolichucky River.	CCT	See Comment 7-1 and Agency Response above. Any future proposed land exchanges would require an appraisal to ensure property values exchanged were equal in property values. The decision notice has eliminated stand 65-6 from further harvesting at this time.
7-3: Specifically, we propose an exchange of those above-mentioned Forest Service lands for Milton Bennett Island, which is approximately 6.5 acres +/-, and a northern portion of the adjoining 35.80 acre tract equal in value the approximate 55 acre tract aforementioned, all being located nearby to the North of said treatment area. Our referenced lands adjoin Forest Service lands and the Nolichucky River and are shown on a plat prepared by Miller's Surveying titled "A TRANSFER OF PROPERTY FROM W.B. SHELLHORN TO DR. CHARLES C THOMAS, II", dated November 12, 1996, a copy of which will follow by mail addressed to you. We have caused an environmental report to be prepared addressing relevant ecological aspects of the lands we propose to exchange, which report is attached hereto as Exhibit B and incorporated by reference herein as if fully set forth, and which includes an aerial depiction of the property in question. The exact boundaries of such northern portion would be determined after consultation with the Forest Service and after appropriate appraisals and inspections of the properties in question are completed.	CCT	See Comments 7-1 & 7-2 and Agency Responses above.
7-4: This proposal meets the criteria established for Forest Service land exchanges in that the proposed land to be conveyed to the Forest Service would benefit the Forest Service and public in the following ways: 1. The property lies within a riparian zone on the Nolichucky River and Milton Bennett Island is surrounded by water, all as shown in Exhibit B attached hereto; 2. The Nolichucky River is a proposed Wild and Scenic River, as recommended by the Forest Service, and as such this land primarily has value for outdoor recreation purposes and needs protection for aesthetic purposes; 3. The Nolichucky River is classified as a Significant Natural Heritage Area by the North Carolina Natural Heritage Program; 4. Acquisition would serve to protect and preserve for the public those aspects of biologic, geologic, and archaeologic value detailed in the accompanying environmental report, which include the Quillback and the	CCT	See Comments 7-1 & 7-2 and Agency Responses above.

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<p>Smallmouth Buffalo, both North Carolina Natural Heritage program Significantly Rare Species, and the Wavy-rayed Lamp mussel, a Species of Concern; 5. Acquisition would prevent future development along the Nolichucky River; 6. Acquisition would protect visual quality for boaters along the Nolichucky River and users of the Poplar Boat launch; 7. Acquisition would enable fire-fighting access to Forest Service property in the area; during a forest fire in the area in May of 2007 that consumed approximately 200 acres of woodland, access was necessary across this property for fire-fighting activities; 8. A risk of fire to Forest Service property in proximity to the Appalachian Trail would be thereby reduced; and 9. This parcel shares its Western boundary with Forest Service property and the exchange would therefore create an efficient boundary line for the Forest Service to maintain.</p>		
<p>7-5: In addition, the divestment of the above-described Forest Service lands would: 1. Consolidate Forest Service property into more easily managed units by divesting a narrow portion of property to the East of and isolated by FSR 5570; 2. Divest property bisected and burdened by a private easement of right of way; 3. Reduce the linear feet of boundary line which must be maintained by the Forest Service, eliminate an irregular boundary line, and create more efficient property boundaries to be maintained by the Forest Service; 4. Resolve an ongoing dispute between the Forest Service and the undersigned and other nearby landowners concerning the uses of that property and easement; 5. Resolve an ongoing dispute between the Forest Service and the undersigned concerning access to their gate and easement and the uses thereof; 6. Resolve an ongoing boundary line dispute between the Forest Service and the undersigned; and 7. Resolve or reduce ongoing problems with trespassers and vandals coming from those Forest Service lands desired to be exchanged, which include the following: a. Repeated instances of trespassing by numerous armed individuals on 4- wheeler vehicles; b. An assault on Gabriele Bryant, a neighboring property owner, by a trespasser; c. Two instances of breaking and entering of the house on our property; d. The driveway gate has been torn down approximately 4 to 5 times; e. The driveway gate has been blocked by logs on approximately 3-4 occasions and the lock jammed approximately 2 twice; f. Trespassers planted marijuana plants on the property of the undersigned; g. And other such and similar instances of trespass and property damage.</p>	<p>CCT</p>	<p>See Comments 7-1 & 7-2 and Agency Responses above. Trespass-related issues are always a concern of the Agency. Federal law enforcement officials have been made aware of your specific concerns and reports of unlawful activity and will continue to patrol the area appropriately. Please note, however, that the Appalachian District covers several counties and over 150,000 acres and, generally, patrols are commensurate with available personnel and areas assigned.</p>
<p>7-6: As noted above, we possess a twenty-foot wide easement of right of way [hereinafter “easement”] that benefits our property, which runs across the treatment area designated 65-6 on the map attached to your comment solicitation. When logging activity began last year on and about</p>	<p>CCT</p>	<p>The decision notice has eliminated Stand 65-6 from further harvesting at this time. No timber harvesting or site preparation related activities will occur on the easement since 65-6 will not be harvested at this time (see decision notice). There will be some activity on the road/landing in 65-6 related to mitigation activities called for in Section</p>

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<p>our easement, at the request, direction, and supervision of the Forest Service, that activity: caused severe damage to the surface of the road constructed on our easement; damaged trees adjacent to that road and thereby created a danger to anyone making use of our easement; blocked the road with trees, logs, and equipment making passage impossible for periods of time; created a log landing next to and adjacent to our gate at the entrance to our easement that invited unauthorized access to our private property adjoining the Forest Service property; and otherwise unreasonably interfered with the use and enjoyment of our easement. Such Forest Service activity was stopped at our request and under threat of legal action. We find no modification in the plans under consideration to prevent the re-occurrence of such interference, aside from a proposed "seen-area buffer" of uncertain area and effect, to be developed in the future by the Forest Service. Noticeably, in the current version of the project proposal, no mention is made of preventing further unreasonable use of our easement by logging equipment, by felled trees and logs, or as a skid trail or log landing area.</p>		<p>2.2.3, Chapter 2 of the EA (seeding and planting of trees), but the Agency does not anticipate impacts to ingress and egress rights.</p>
<p>7-7: Based on our experience of last year during the initial stages of logging in connection with this project and on a review of the materials provided to us, we conclude that the planned uses of the single-lane portion of White Oak Flats Road and our easement and road will cause, for extended periods of time, interruptions in emergency services, including fire and ambulance, to the properties served by those roads and prevent access to such properties. Such uses will also prevent egress along those roads, for equally extended periods of time, for access to hospitals, places of employment, grocery stores, daycare centers, and all other critical and non-critical places to which people need and require access. In addition, during periods in which access is permitted to and from those properties served by those roads, ingress and egress thereon may be made unreasonably hazardous by reason of nearby trees damaged by logging operations. No measures have been proposed to date to reduce or eliminate these concerns.</p>	<p>CCT</p>	<p>Comment is noted. While there may be temporary and reasonable delays due to harvest-related activity, no public roads will be indefinitely blocked due to the activity and public safety along public roads will always be appropriately considered. Harvesting and timber hauling have occurred on the road in the past.</p>
<p>7-8: The use of logging trucks on that single-lane portion of White Oak Flats Road beyond its intersection with Harmiller Gap Road is likely to dangerously degrade the road surface and supporting soil, in addition to causing road blockages and extended delays in traveling that portion of White Oak Flats Road.</p>	<p>CCT</p>	<p>Comment is noted. Forest Service Road (FSR) 5570 that connects to White Oak Flats Road near Harmiller Gap is an unpaved, single lane road with turnouts that provides access to NFS lands in the White Oak Creek area. The road was constructed in the late 1980s to replace an old, entrenched road that was in a poor location. The Forest Engineer reviewed the road on August 23, 2006, and determined it [i]s in excellent condition with little if any deferred maintenance. Generally the aggregate surface is 14 feet wide with an additional 1 to 2 foot shoulder. In most places the road varies between 2 and 3% outslope which is optimum. Since the road follows the contour of the slope the grades are less than 8% along most of the length. Again, this is ideal for construction of an outsloped road. Drainage is functioning as designed. This road</p>

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		<i>was designed for use by log and dump trucks. These types of truck will not have any trouble utilizing this road safely while loaded. The aggregate surfacing is adequate too support loaded trucks during the normal operating season. There are enough turnouts on the road to allow for good traffic flow even during logging operations. Reconstructing this road to add a ditch would be a major project. It would involve widening the road into the cut bank by a minimum of 5 feet. In addition, a number of culverts will need to be installed to provide cross drainage. The action would also create a significant volume of excess excavation, would require significant clearing, and disturb stable slopes. The existing road is adequate to harvest the timber from this proposed project. Trucks and light vehicles can safely drive on this road.</i>
7-9: The project proposal calls for daylighting an average of 30 feet around FSR 5570, which adjoins and intersects with our easement, but also calls for the aforementioned “seen-area buffer” along our easement. Although the proposal states that “[d]aylighting would not occur within existing harvest units . . .” “harvest units” is an undefined term. Therefore, it cannot be determined from the text of that proposal whether the harvesting of trees and consequent damage to the environment and aesthetic beauty of the forest on and around our easement is being specifically proposed. Daylighting would negatively impact the aesthetic beauty of the forest and property values in that area, including our property values.	CCT	Comment is noted but not accurate – the 3/17/08 scoping letter stated: <i>Daylight an average of 30 feet either side of Forest Service Roads (FSRs) 5572 and 5506 [emphasis added], and Lewis Trail for about 3.5 miles (about 25 acres). Daylight the following existing wildlife fields: Bearwoods, Lewis Trail, Devil’s Fork Gap, White Oak Creek, Annie’s Cove, Beauty Spot (NCWRC), and Chestnut Mountain. Daylighting would not occur within existing harvest units and stream protection zones. FSR 5570 is not proposed for daylighting. Harvest units are specifically identified by stand in the first bullet on page two of the 3/18/08 scoping letter.</i>
7-10: Furthermore, the planned use of herbicides in proximity to private property, our easement, and other roadways in the area exposes persons and private property to such chemicals. This will negatively impact private property values and cause potential health risks for those exposed persons.	CCT	An alternative was considered but eliminated from detailed study that did not propose herbicide use. Herbicides are necessary to safely, effectively and efficiently meet project objectives.
7-11: Under the circumstances outlined above, it is not in the public’s interest or in the best interest of the Forest Service to proceed with a project that seeks to harvest timber to generate revenue at the expense of the public safety, including our own, at the expense of private property values in the area, and at the expense of the reasonable use and enjoyment of our easement. This is particularly true in light of the land exchange proposal set forth above that is so much more beneficial to the public’s interest and to the interest Forest Service. However, the above land exchange proposal cannot remain effective if the currently planned timber activities are carried out on the ground.	CCT	See Comments 7-1 and 7-2 and Agency Response above. Alternative A addresses a portion of this comment. The Agency anticipates no depreciation in value of the property proposed to be conveyed to the Thomas’ as a result of implementing the Shinwhite project. The boundary of the nearest cutting unit (65-1) is not directly adjacent to the proposed exchange area (it is separated by Whiteoak Creek). Therefore, implementation of the project will not adversely impact the ability of the Agency and the Thomas’ to further consider the proposed land exchange.
7-12: In conclusion, we request that all proposed timber activities in and about the 65-6 treatment area and the associated roadways in that area be abandoned. We also request that the Forest Service properly investigate and evaluate the proposed exchange, which is more desirable and beneficial to the public and the Forest Service than the currently proposed timber activities. We request that a road analysis be prepared in	CCT	See Comments 7-1 and 7-2 and Agency Response above. The Forest Service will appropriately review the proposed land exchange. A roads analysis is necessary when: <i>[p]roposed road management activities (road construction, reconstruction, and decommissioning) would result in changes in access, such as changes in current use, traffic patterns, and road standards, or where there may be adverse effects on soil and water resources, ecological processes, or biological communities, those decisions</i>

