United States Department of Agriculture
Forest Service
National Forests in North Carolina
Pisgah National Forest
Appalachian Ranger District
Burnsville Station
PO Box 128
US 19 Bypass
Burnsville, NC 28714-0128
828-682-6146

File Code: 1950
Date: June 22, 2007

Dear Interested Members of the Public and Forest Users:

On April 19, 2007, I initiated a 30-day Notice and Comment period for the Shope Creek project, located approximately six miles northeast of Asheville, North Carolina in Buncombe County. During the Notice and Comment period, I also hosted an open house meeting at the Riceville Community Center on the evening of April 26, 2007. Since then, I have received comments and interest in the proposal from about 270 members of the public, including state and federal agencies. I and members of the interdisciplinary team reviewed each comment carefully and determined there are about 45 categories (themes) the comments fit within.

I began our public involvement for this proposal with a commitment to you that the process would be one of open dialogue and that you would be kept informed of our progress throughout the environmental analysis. With that in mind, our written response to the comments is enclosed for your review. After reviewing the enclosure, if you believe we have misunderstood your concerns or not responded adequately, I would appreciate hearing back from you.

Based on the comments we received, I tentatively have identified a range of alternatives that will be evaluated; the results of the evaluation will be reported in the environmental assessment (EA). These include; the No Action Alternative; the Proposed Action as described in my April 19th letter; an alternative that proposes burning within the white pine stands (23-12A & 23-12B); an alternative that does not propose herbicide use; an alternative that only harvests the white pine stands; an alternative that does not harvest older aged stands (stands averaging greater than 100 years in age); an alternative that does not harvest by regeneration methods (two-age); and an alternative that creates additional early-successional habitat.

I understand the Southern Appalachian Biodiversity Project (SABP) is coordinating the formulation of an alternative and is taking an on-line survey of anyone interested in the development of the alternative. I expect to hear from SABP on the specifics of this alternative during the first week of July.

If you have any questions about the status of the project or the information contained in the enclosure, please contact team leader Michael Hutchins or myself at (828) 682-6146.

Sincerely,

/s/Anthony Matthews
ANTHONY MATTHEWS
Acting District Ranger

Enclosure

RESPONSE TO COMMENTS RECEIVED DURING THE SHOPE CREEK PROJECT 30-DAY NOTICE & COMMENT PERIOD

General Discussion

On March 29, 2007, the Appalachian Ranger District placed a legal notice in *The Asheville Citizen-Times* newspaper requesting public input on a roads and access management analysis in the Shope Creek area; 11 members of the public provided comments. Following consideration of those comments. evaluation of forest plan direction, and a meeting with the adjacent landowner concerning the road right-of-way, his gate, and public parking issues, the District developed a specific project proposal (the Shope Creek Proposed Action).

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 Shope Creek Proposed Action began April 22, 2007, and ended on May 21, 2007. Pursuant to 36 CFR 215.5, the legal notice initiating the 30-day Notice and Comment period was placed in April 21, 2007, edition of *The Asheville Citizen-Times*, the Appalachian Ranger District's newspaper of record; 270 members of the public provided comments or expressed interest in the proposal during the Notice and Comment period. On April 26, 2007, Acting District Ranger Anthony Matthews and members of his staff hosted an open house at the Riceville Community Center; 129 members of the public signed in at the meeting (which are included in the 270 members of the public). Based on careful review and content analysis, the comments were grouped into the following 45 "themes:"

Air Quality	Alcohol/Shooting Restrictions	Alternatives	Archaeology
Basal Area Retention	Bridge Constructed on Shope Creek	Categorical Exclusions	Comment Period/Commenting
Day Use	Do Not Move Gate or Develop Turnaround	Drug/Alcohol Use	Economics
Environmental Education	Fires/Fuels	Firewood Removal	Garbage Dumping
Haul Routes	Herbicide Use	Increased Use/Traffic	Insects/Disease
Invasives	Law Enforcement/Patrolling	Long-term Uses	Meeting
Move the Gate	No Action	No Harvesting	No Harvesting Hardwoods
Old Growth	Post-logging Rehabilitation	Provide Access	Provide Parking
Rare Plants List	Recreation Access/ Development (trails)	Road Construction/ Reconstruction	Roads Analysis Process
Scenery	Stream Buffers	Support for Proposal	Thin Without Regeneration
Timber Stand Improvement	Unauthorized Roads	Water Quality/Sedimentation	Wilderness Potential
Wildlife Habitat/Populations			

To meet requirements at 36 CFR 215.6(b), the Agency listed each "theme" with the comment received on it (or if more than one comment was received, a representative group of comments for that theme are listed) followed by the Agency's response.

Air Quality

Comment Received

A): "*The prospects of logging leads me to expect significant burn offs as well which raises the question of air quality as well as in our already pollution ridden valley.*"

Agency Response

A): The proposal does not include prescribed burning due in part to the limited amount of National Forests System (NFS) lands and the difficulty in controlling prescribed fire within the project area given the Blue Ridge Parkway, private lands, and the Asheville watershed bordering NFS lands. The proposed harvest and road management operations are small enough and the expected amount of time to complete the project is short such that air quality is not expected to adversely change as a result of the project.

Alcohol/Shooting Restrictions

Comment Received

A): "*If the area should be open, it would be my desire for it to be alcohol free and no shooting around houses.*"

Agency Response

A): In discussions with adjacent land owners as well as the written comments, the District realizes that many people are very concerned about the potential for alcohol and other drug-related disturbances to occur in the Shope Creek area. This problem has occurred in the past and folks were concerned about the appropriate level of law enforcement available. The District has confirmed that local law enforcement officials as well as our own law enforcement officers can take legal actions and cite violators on forest service lands. Furthermore, the District is discussing with the Forest Supervisor the possibility of prohibiting the use of alcohol in the Shope Creek area as well as limiting it to day-use only.

On lands open to hunting such as Shope Creek, the hunters are required to comply with the State's hunting regulations and any local laws that may be in place for Buncombe County. For example, local laws typically prohibit or restrict hunting or shooting from public roads.

Alternatives

Representative Group of Comments Received

A): "*The designation of 50 acres of old growth is necessary, but not sufficient. I have hiked the entire drainage from the bottom to the summit of Lane Pinnacle and have found much more extensive areas of late successional species. I believe that the best approach to land stewardship in the Shope Creek area is to identify and help perpetuate areas of mature high quality forest, help to ameliorate the effects of previous logging activities (there are many areas with very dense tulip poplar and red maple saplings with eroded soils and essentially absent herbaceous understory that could be thinned), identify and protect threatened and endangered plant and animal populations and their habitats, and actively manage introduced pests (hemlock woolly adelgid, e.g) and exotic invasive plant species.*"

B): "*This proposal asks the National Forests in North Carolina (NFNC) to initiate a major and continuing program of active management through integrated stewardship projects emphasizing the creation of game and non-game wildlife habitat and improving forest health though timber management. The proposal also requests that the NFNC use the new authorities and revenues generated by the timber activities to fund better access, trail and campsite development, coldwater fisheries improvement, prescribed burning, invasive species control and other needed management activities on the Pisgah and Nantahala National Forests.*"

C): *"Where are the alternative actions? Scoping notices typically contain at least three alternative actions."*

D): "*To that end the public will need an opportunity to comment on any range of alternatives developed for the Shope Creek area. The current proposal does not give enough specific information for the public to submit informed comments on the proposal. NEPA regulations clearly intend for the citizens of the United States to participate in management decisions based on all available information. To provide the information, the USFS will need to produce an accurate age-class map of the area along with a detailed history of any agency visits and actions to the compartments within the project area. The road labeled C, leading to stand 24-10 crosses many feeder springs to the east branch of Shope Creek and should never have been included in the proposal. Said inclusion indicates that there has been very poor decision making on the part of the USFS to this point. As a citizen residing in the neighborhood of the project, I insist on an opportunity to comment on the full range of alternatives required under NEPA.*"

Agency Responses

A): The District recognizes that some folks would prefer to see a great deal more of the area designated and managed as old growth. However, to meet the goals and objectives of the forest plan and respond to other resource needs in the area, specific management actions are necessary. The proposal would designate at least 100 acres of small patch old growth communities – at least 50 acres in Compartment 23 and at least 50 acres in Compartment 24. This complies with forest plan direction for providing small patch old growth areas in conjunction with established medium and large size patches. Given that we are proposing to treat about 68 acres out of 1500 acres results in the majority of the area retaining a future option of managing for older timber over time if that becomes a goal for the area.

Regarding the preference for managing for mature, high quality forest and ameliorate effects of previous harvests, our proposal is designed to respond to a wider range of resource needs. A primary focus is improving the diversity of wildlife habitats for species such as black bear. The project would result in managing treated areas to increase the amount of oak and hickory dominated stands of trees. This will improve the diversity of species and habitat age-classes within the area, thus improving the quality of the forest for wildlife.

The proposal has been designed to reduce potential for adverse impacts to resources in the project area and anticipated effects to these resources would be analyzed and disclosed in the environmental assessment (EA). The project is designed to protect threatened and endangered plant and animal populations and their habitats. As part of our analysis, the ID Team surveys the area for threatened, endangered, sensitive, and forest concern species (plants and animals). We will determine what effect the proposal may have on any identified species and take appropriate measures to protect them.

Our proposed action also takes into account the existing invasive species problems of the area and includes measures to monitor and treat invasive exotics. For example, the purpose of the herbicide treatment of Japanese spirea, multi-floral rose, and other invasive/exotic plants prior to harvesting is to reduce potential for spread of them in the project area. We will continue to monitor and treat if necessary these and other exotic invasives.

B): The commenter proposes more stewardship contracting across the forest. Once we have completed the environmental analysis and a decision is made on the specific actions to take, implementation of projects can be part of the forest's stewardship contracting.

C): Alternatives are developed following public input. The Shope Creek proposal was submitted under a 30-day Notice and Comment period as per 36 Code of Federal Regulation (CFR) 215.3 and 215.6. The proposal was designed to achieve the project's purpose and need. The public is asked for any comments or concerns so the District can determine whether there are issues that need to be addressed. If issues are identified, then alternatives may be developed in response to those issues. Once we have completed the review of comments and determined whether alternatives are needed to respond to the issues, the public will be informed of the results.

D): The Agency provided a very detailed proposal to achieve stated objectives in a scoping letter that was made available for a 30-day Notice and Comment period. Holding the Notice and Comment period early in the NEPA process allows for meaningful input on the proposal and allows the District to incorporate those comments into its development of potential alternatives and to determine whether key issues need to be addressed. The Agency has developed an age-class map of the Shope Creek area which will be used in determining the effects of the proposed action. We also will be looking at past actions and reasonably foreseeable actions as part of our cumulative effects analysis.

As stated at the public open house, we will keep the public informed as we move through the environmental analysis and continue to share information about the analysis, including the development of alternatives. If anyone feels that they have additional comments to offer, those comments will be welcome and evaluated as part of our continuing scoping during the entire process.

Archaeology

Comment Received

A): "*There are Indian artifacts and sacred sites in this proposed area.*"

Agency Response

A): Zone Archaeologists have surveyed the project area and archaeological properties that need protection would be avoided during project implementation.

Basal Area Retention

Comment Received

A): "*I would like to see proposed track 24-11 left to have more trees in that area from the 15 tree limit to 60 tree limit per acre.*"

Agency Response

A): The proposal actually refers to retention in terms of square feet of basal area; specifically, the proposal refers to retaining between 15 and 20 ft^2/acre in stand 24-11. Basal area retention over 30 ft^2/acre throughout a stand does not provide enough regeneration to achieve early successional habitat objectives. Leaving as many as 60 trees per acre as requested also would not allow us to achieve the objectives for creating early succession habitats. However, we will be analyzing the effects of the proposed retention levels to insure that our visual quality objectives are met. As such, the actual level of retained basal area may vary.

Bridge Constructed on Shope Creek

Representative Group of Comments Received

A): *"If the "present" gate is pushed back ½ mile, which I think is a good idea a bridge needs to be built over the river that will be crossed in order to get to the parking area. I say this due to the environmental impact to the water quality that could come from petroleum and sediment from cars. I do not think that gravel on each side of the river will help."*

B): "*Shope Creek is currently protected from frequent vehicular crossings. Beyond the private gate is a concrete sluice-way that allows easy crossing but does not prevent pollution and sediment from entering the water. The forest side of the concrete is soil and grass and will quickly erode under the weight of vehicles. If this crossing of Shope Creek, by way of an easement through private property, is to be used for public access to the National Forest, then the Forest Service must consider building a bridge over the creek at the crossing point to meet the standards of the Clean Water Act of 1977."*

Agency Responses

A and B): The ID Team (including a fisheries biologist, hydrologist, and engineer) is evaluating potential risks and effects associated with vehicles crossing at the current concrete low-water crossing. We are looking to determine whether additional mitigations (such as a bridge, erosion control measures, etc.) are necessary to protect water quality. If additional mitigations are determined necessary, they can be added to the proposal before the decision is made.

Categorical Exclusions

Comment Received

A): "*I would hope that you allow comments on the proposed areas rather than using categorical exclusion."*

Agency Response

A): Comments were requested on the proposal pursuant to 36 CFR 215 beginning April 21, 2007, and completion of an EA is expected prior to project initiation. At this time, there are no proposals for categorically excluded projects within the area.

Comment Period/Commenting

Representative Group of Comments Received

A): "*I also think that it is of eminent importance to have a second commenting period after the environmental assessment."*

B): "*I request that a second public comment period be held following the environmental assessment."*

C): *"Why is this meeting happening before the environmental assessment? Why is there no promise of a public comment period after the EA comes out?"*

Agency Responses

A, B, and C): The reason for holding the comment period early in the process is for the District to hear and consider meaningful input during the project design and analysis to insure that issues are fully identified and appropriate alternatives considered. As stated several times during our open house meeting, the public will be kept informed as we move through the analysis so there are no surprises and so the public can evaluate whether their comments have been heard and given careful consideration. We held the open house meeting during the 30-day comment period to insure the public had the opportunity to discuss with us personally any questions they may have about the proposal and insure there was a clear understanding about the proposed action and to provide any comments at that point. The public open house was another means the District offered for individuals to develop their comments and understanding of the proposal.

However, should the responsible official determine that it is warranted, a second notice and comment period under 36 CFR 215 regulations could be initiated. While the option for a second comment period under 36 CFR 215 remains available, the decision on whether it is needed will be made later in the environmental analysis process.

Day Use

Comment Received

A): "*Need to block access in evenings to prevent what a long-term resident of 64 years here calls "rednecks" who trash the place, get drunk, drive the roads in a degraded state, etc. Likely that a neighborhood association or individuals would support and help control the gate."*

Agency Response

A): Should the proposal or another action alternative be selected, the operations would occur behind a locked gate. Each time a contractor's vehicle passes through the gate, it would be locked. As mentioned earlier, the District Ranger is working with the Forest Supervisor to evaluate whether any specific closures should be put into place after the project is completed.

Do Not Move Gate or Develop Turnaround

Representative Group of Comments Received

A): "*I oppose moving the gate and making a turn-around at the end of Shope Creek. It would open up public access and there has been many violent crimes and camping of vagrants, I believe making the access easier would also increase problems."*

B): (phone conversation with a resident of the Shope Creek area) The individual stated their opposition to moving the gate to NFS lands. The individual likes the gate where it is because moving it to NFS lands would increase access for other users such as mountain bikers.

C): "*The need to provide public access does not require any road work. There is currently a road of sufficient size to allow access to the area with ample room for parking. The area should be open for foot traffic only as it will be the closest National Forest access point to the city of Asheville and will be heavily used."*

Agency Responses

A, B and C): The no action alternative would result in the gate not being moved from the current location. That alternative will receive equal consideration to any action alternative considered, including the proposed action. Opposition to moving the gate is noted; however, we received a lot of comments from people (many who live in the Shope Creek area) expressing support for moving the gate and resolving the issues of access and parking. Many members of the public disagree there is currently adequate parking to access the Shope Creek area. The current gate location and space provide parking for one vehicle. The area is currently designated as non-motorized and the gate (whether moved or not) would remain closed.

Drug/Alcohol Use

Comment Received

A): "*If too many outsiders are in there we will be back to drunks and drugs. I got tired of picking beer cans out of my yard. Years ago someone grew a drug patch up there to the left."*

Agency Response

A): In visiting with adjacent property owners and talking with folks at the open house, we heard about these concerns many times. We recognize the problems that occurred in the past and the public's concern over whether there are enough law enforcement agents available to monitor and respond to problems. The Forest Service has a responsibility to provide equal access to NFS lands to everyone; that is the reason we are proposing to move the gate. We will monitor activity in the area and take appropriate actions if problems occur. We have confirmed that local law enforcement (i.e., the Sheriff's Department) has full enforcement jurisdiction in the area in addition to the enforcement provided by USFS Law Enforcement. See Alcohol/Shooting Restrictions and Day Use sections above and Law Enforcement/Patrolling section below.

Economics

Representative Group of Comments Received

A): "*I do not think this plan is economically viable to harvest 68 acres to cover the gate move and put more roads in."*

B): "*The Forest Service must consider the economics of this project as it relates to the impact on local tourism and recreational opportunities. The protection of these valuable resources far exceeds the value of logging and road building."*

Agency Responses

A and B): No new roads would be constructed with the proposal; only certain roads will be reconstructed and one road will be decommissioned. Forest Service policy requires a financial efficiency analysis be prepared for timber sale proposals expected to exceed $100,000 in value (Forest Service Manual 2432.12). The Shope Creek analysis will complete a financial efficiency analysis.

An analysis comparing the value of tourism and recreation to timber operations is beyond the scope of the analysis for the proposed action. This level of economic analysis was completed for the Final Supplement to the Final Environmental Impact Statement for the Nantahala and Pisgah National Forests and the Final Environmental Impact Statement for the Vegetation Management in the Appalachian Mountains that analyzed socio and biologic-related impacts.

Environmental Education

Representative Group of Comments Received

A): "*This area is incredibly biodiverse and the Shope Creek area's proximity to town merits it a wonderful opportunity to be a center for environmental education about the Southern Appalachian forests. I feel the USFS does FAR TOO LITTLE environmental education and a bit too much managing for already over abundant species."*

B): "*As a teacher and field botanist, I particularly value access to high quality natural areas in close proximity to UNCA. Although there are many areas in our region that offer opportunities for educating our biology and environmental studies students about ecology and field biology, Shope Creek is one of the very few that are within a very short drive from campus. Our laboratories are scheduled to last three hours, so one-way driving times of more than one-half hour severely limit the time available for students in the field."*

Agency Responses

A): The proposal was designed to achieve the purpose and need; however, there would still be opportunities for environmental education when any of the alternatives considered in detail (including Alternative A) are implemented. There are other areas on NFS lands where environmental education is the primary purpose, including The Cradle of Forestry in America.

B): The Agency recognizes the importance many members have for access and study of NFS lands – these opportunities would continue under any of the alternatives analyzed in detail (including Alternative A).

Fires/Fuels

Representative Group of Comments Received

A): "*I am in favor of logging to help clear the undergrowth which will help prevent fires, etc."*

B): *"*[I] *wonder if it might be effective to run fire through the white pine stands in particular following herbicide."*

C): *"We both think that managed forests (we live on a dead end away from everything on a cul-de-sac in Shope Creek) can be good for fire management. However, this proposal does not sound like good forest management. When you clear in this way, all you get is undergrowth scrub."*

Agency Responses

A): Comment noted.

B): An alternative that prescribe burns within the white pine stands following herbicide will be evaluated to determine if it is feasible and meets the project's objectives.

C): Post-harvest there would be additional biomass left on the ground from current conditions. However, after a season or two it begins to breakdown and become less of a wildfire threat; at this time, we do not anticipate any increased risk of wildfire due to the proposed action. In terms of increased undergrowth shrubs, the proposed action includes site preparation and release activities using herbicides and hand tools to manage the levels of undergrowth shrubs in harvested stands.

Firewood Removal

Comment Received

A): "*Let me know if it will be possible to come in and take any dead trees on the ground when the cutting begins."*

Agency Response

A): During project implementation, the area would remain closed to vehicle access. Following implementation, this may be an administrative action approved if there is determined to be an excess level of dead trees on the ground and cutting and extraction would not cause resource damage.

Garbage Dumping

Representative Group of Comments Received

A): "*Also with that access people will make that access to the gate a dumping ground for their trash."*

B): *"When I first moved to Shope Creek in 1984 the forest was open to the fork in the road which attracted a great deal of illegal activity and provided a free trash dump to much of Buncombe County. Please do not open the forest to vehicles very far up from the present gate and do not allow space for more than 4 or 5 cars."*

Agency Responses

A): As stated in the April 19, 2007, scoping letter: Forest Service would work closely with state, county, and municipal law enforcement agencies to manage/control use in the area. Should a recurring problem develop, appropriate actions will be considered.

B): The proposal would open the road another couple hundred feet from the current gate and the small turnaround would allow about 3-5 vehicles to park. The proposed gate location is as close to the current location while providing some parking for people wishing to access the national forest lands.

Haul Routes

Representative Group of Comments Received

A): "*Loggers sunk the first bridge hauling too much out on each load. We had to drive on boards for two months until they rebuilt the bridge. The second bridge can't take allot or it will break. It's turned at the wrong angle any way for that type of traffic."*

B): "*I am concerned about log trucks and heavy equipment using the State roads and bridges. The bridges are not rated for very heavy loads and the asphalt is not very thick. Who would be responsible for repairing any damage that may occur?"*

Agency Responses

A and B): We have visited the bridges on site and determined they are posted as follows:

> The Shope Creek Road bridge closest to the project area has weight limits of 12 tons for single vehicles and 20 tons for tractor/trailers. The next bridge on Shope Creek Road has weight limits of 23 tons for single vehicles and 29 tons for tractor/trailers. The bridge out on the Riceville Road has a weight limit for tractor/trailers of 39 tons.

The bridge of most concern is the one closest to the project area on Shope Creek Road (12 and 20 ton limits). Given the short span on these bridges, there should only be one axle crossing the span at a time for log trucks. The State limit per axle for log trucks is 10 tons; the bridges should sustain the weight.

We are scheduling a meeting with the North Carolina Department of Transportation to verify the bridges and the pavement along the Shope Creek and Riceville Roads can hold up under the weight of the log trucks and associated equipment.

Herbicide Use

Representative Group of Comments Received

A): "*Also, the spraying on the lower two tracks next to the water – is it really safe to streams, branches?"*

B): *"I do understand the goals of fighting invasive species. I won't be convinced the possible consequences of herbicides leaching into our streams, ground water, and soil are worth the risks."*

C): *"Besides the herbicide treatment – no matter how safe manufacturers say their product is – will have deleterious effects on water quality and Shope Creek is considered highest quality water and top wild trout habitat. This should not be sacrificed or risked by use of toxic herbicides."*

D): "*I think we need to forget any use of herbicide, especially by sprayer. The side effects on birds, insects, humans, are not really known. Why take a chance?"*

E): "*While I strongly agree with your proposal to eradicate various invasive exotic plant species, I have misgivings about the use of triclopyr/glyphosate to do the job. Studies do show this herbicide to be relatively benign, but I remain skeptical, preferring instead to use non-chemical means. I need some assurances that this particular chemical will damage neither animal species in the spray area nor those who do the spraying, and that it will quickly dissipate completely once the job is done."*

Agency Responses

A): Herbicides are applied under strict project design features that would be disclosed in the EA. For use near water the following project design features are applied: No herbicide is ground-applied within 30 horizontal feet of lakes, wetlands, or perennial or intermittent springs and streams. No herbicide is applied within 100 horizontal feet of any public or domestic water source. Selective treatments (which require added site-specific analysis and use of aquatic-labeled herbicides) may occur within these buffers only to prevent significant environmental damage such as noxious weed infestations. Buffers are clearly marked before treatment so applicators can easily see and avoid them. Herbicide mixing, loading, or cleaning areas in the field are not located

within 200 feet of private land, open water or wells, or other sensitive areas. Herbicide use within either the 30 foot or 100 foot horizontal buffers is not proposed with the Shope Creek project. Herbicide use would also adhere to Requirements for Vegetation Management in the Appalachian Mountains listed in Appendix I of the Forest Plan (pages I-10 – I-14).

B): Use of herbicides on NFS lands occurs based on environmental analysis disclosed in the Vegetation Management in the Appalachian Mountains (VMAM) FEIS, issued July 1989 and risk assessments completed by Syracuse Environmental Research Associates, Inc. (see the following web site for the risk assessments completed for Triclopyr and Glyphosate http://www.fs.fed.us/foresthealth/pesticide/index.shtml). See also Comment A and Agency Response above.

C): Adverse impacts to water quality and aquatic habitat are not expected because herbicides would not be applied on streams, nor within 30 feet of them (see also Comments A & B and Agency Responses above).

D): As required by the Pisgah Forest Plan, as amended by the record of decision for the FEIS of the Vegetation Management in the Appalachian Mountains, an alternative that does not propose herbicide use would be examined.

E): See Comments A & D and Agency Responses above.

Increased Use/Traffic

Comment Received

A): "*I've lived on Shope Creek my entire life. When it was open to the public it was an utter nuisance! Parties, stabbings our main entertainment was watching the police going up and down the road. The gate feels illegal, but stopped the problem."*

Agency Response

A): The no action alternative would not move the gate; this alternative will be analyzed fully. The Agency is aware of the past problems that occurred when access was provided further up the drainage; however as stated in the April 19, 2007, scoping letter: *Forest Service personnel would work closely with state, county, and municipal law enforcement agencies to manage/control use in the area*. See also Alcohol/Shooting Restrictions and Day Use sections above and Law Enforcement/Patrolling section below.

Insects/Disease

Representative Group of Comments Received

A): "*What are the diseases/insects the pines are susceptible to?"*

B): *"Might be possible to include hemlock wooly adelgid treatments in Shope Creek area – lots of Carolina hemlock."*

Agency Responses

A): White pine is susceptible to southern pine beetles and annosum root disease (*Heterobasidion annosum*). However, managing for oaks and hickory following removal of white pines is a stated purpose of this treatment also.

B): On January 14, 2005, the Regional Forester signed a decision notice that approved the release of predator beetles and allowed chemical treatments to hemlocks in certain areas on the Forest – the Shope Creek area was not included in the decision. That said, it is possible that an amendment to the decision could be completed that added new release/injection areas, such as Shope Creek. This would be dependent on additional funding as the Forest does not currently have sufficient funds/personnel to carry out the analysis and release/injections.

Invasives

Representative Group of Comments Received

A): "*Old growth forests promote a bio-diverse forest by building resources that keep out invasive species. So by cutting in stand 23-13, the cut would fragment this ability to naturally keep out invasives that harbor disease to tree species. Stands 23-11, 23-12, 24-11, 24-10 do not need to be thinned anymore because more light would promote more invasive species entering these areas."*

B): *"I would encourage you to be especially aware of invasive species before harvest."*

C): *"Entering the forest for any type of operation will also aggravate the invasive problems already existing at the site. Machinery will carry in seeds of invasives and spread them despite the herbicide treatment this project will result in an increased invasive problem. An intact, undisturbed forest is the best approach to invasives."*

D): "*Two-age harvest in compart-stand numbers 23-13, 23-11, 24-11, and 24-10 will expose the understory of stands in the core of the Shope Creek area to a high light environment that will encourage the establishment and spread of exotic invasive species."*

E): "*I am not necessarily opposed to use of pesticides for controlling exotic invasives, but see nothing in the proposal that emphasizes these chemicals being used in an integrated plan of pest management. For exotic invasives, IPM includes mechanical*

approaches to exotic invasive removal that occur prior to and after herbicide application. Most importantly, these chemicals must be applied during the winter to prevent the elimination of remnants of native herbaceous species that are very important for reestablishing a native, herbaceous plant community. The species to be planted on the road is not stated, but if those species are non-native grasses, then those species have the potential to become invasive. Native grass species such as the red fescue (Festuca rubra) are available, but I have not seen them used by the Forest Service."

F): "*Currently, the timber stands slated for two-age harvest are relatively free of infestation. Roads and sunlight will change their condition for the worse and in a few years the areas will need to be treated for invasives. There is no example that the USFS can produce of a timber sale that was not over-run with undesirable invasives afterwards. The only way to prevent it would be constant cultivation, a type of practice the agency can not afford and will not perform."*

Agency Responses

A and B): Invasives are established in the area and would continue to spread even without harvesting. As stated in the April 19, 2007, scoping letter the proposal would: *Control/manage known populations of invasive exotic plant species in the analysis area* ***prior to entry*** (emphasis added). *Primary control method would be herbicide (Triclopyr/Glyphosate). Application would be by backpack sprayer*. There would be opportunity for invasives to become established in the project area following harvest activities, and a post-treatment evaluation report would be completed and filed in the project file according to direction in the Forest Service Handbook 2109.14 Chapter 70 paragraph 72 – POST-TREATMENT EVALUATION. Based on the post-treatment evaluation reports, additional treatments may be necessary to reach objectives.

C): The project area is currently disturbed and has been for more than a century. That said, invasive species would continue to spread within the area with our without the timber sale and related activities. The Agency recognizes the potential for the spread of invasives to increase with timber harvesting and road work without control treatments, thus the reason the proposal would treat them prior to harvesting (see also Comment A and Agency Response above).

D): See Comment A and Agency Response above.

E): Treatment with herbicides would be the primary method for managing/controlling herbicide spread—manual and mechanical methods would also be used where appropriate. The Agency Response to Comment C of Unauthorized Roads Section below addresses seed mixes. An alternative that does not propose herbicide use will be examined.

F): Hardwood timber sales harvested in the past 25 years in the Shope Creek area are not overrun by invasives. There are invasives within the white pine stands and along existing roads; the proposal would treat these infestations.

Law Enforcement/Patrolling

Representative Group of Comments Received

A): "*If the gate is moved back could a strong emphasis be placed on patrolling on the weekends? Because there will be allot of trouble to be started back up."*

B): "*The Forest Service's budget has been drastically cut. How are you going to afford more officers to protect and DEFEND this proposed site?"*

C): *"There seems to be no management plan about how to deal with increased uses except the gate will always be locked unless trucks/US Forest staff are accessing back country."*

D): "*Contractors must be overseen by USFS employees while work is being conducted to ensure care is taken in all stages of prescribed work."*

Agency Responses

A): As stated in the April 19, 2007, scoping letter: *Forest Service personnel would work closely with state, county, and municipal law enforcement agencies to manage/control use in the area*. The Agency is aware that most of the previous adverse activities occurred on weekends. Our law enforcement officers adjust their work schedules so weekend patrols can be covered.

B): As stated in the proposed action, our agency works in cooperation with local law enforcement agencies. (see Comment A and Agency Response above).

C): See Comment A and Agency Response above.

D): During harvest-related activities, a Forest Service Sale Administrator would oversee the timber sale contract and ensure compliance.

Long-term Uses

Representative Group of Comments Received

A): "*What is the intended long-term use of Shope Creek?"*

B): "*This parking lot and the gate is a band-aid that will not cover a gaping wound that will result from the impact on this small piece of land. Given the experience with Bent Creek (and the mess there from lack of a plan), this area deserves careful consideration of how to protect it and allow recreational use. A poor plan results in a damaged forest – a loss for all of us."*

Agency Responses

A): The intended long-term use of the area (desired future condition) is established in the Forest Plan and was summarized in the April 19, 2007, scoping letter, which stated in part: [p]*roviding high quality wildlife habitat, particularly for black bear. The preferred habitat for black bear includes freedom from the disturbance of motorized vehicles, some areas of older forest, a sustained supply of hard mast (such as acorns from oaks) and den trees, and small, widely dispersed openings providing the soft mast (fruits and berries) typically found in very young forest. Timber management activities should be designed to provide these conditions. The variety of wildlife likely to be present in management areas include ovenbird, black bear, and cerulean warbler* (Forest Plan, page III-77). [e]*mphasize high quality habitats for wildlife requiring older forests and freedom from disturbance from motorized vehicles. Allow small widely dispersed openings throughout the management area. Close most roads to private motorized vehicles. Early successional habitat is provided in conjunction with managing suitable timber land in these areas* (Forest Plan, page III-78). [s]*chedule to revisit each compartment at 10 to 15 year intervals* (Forest Plan, page III-85). [d]*isperse early successional habitat (0-10 year age class) within compartments and analysis areas* [n]*ot to exceed 10%* (Forest Plan, page III-31).

B): We recognize the potential pressures that could develop for the small area of Shope Creek. As a result, the District has begun discussions with the Forest Recreation Staff Officer to consider development of a recreation management plan for Shope Creek. For the current proposed action, we are limiting the size of the planned parking area to 3-5 vehicles.

Meeting

Representative Group of Comments Received

A): "*Thank you for public hearing."*

B): *"First, I have concerns with the set up of this meeting. Most public comment meetings I have been to are forum style where everyone gets a chance to ask questions about the plan after it is presented. Then people get to speak for a few minutes and voice their feelings in it. In this type of set up, no one can hear what the others have to say. Even though there is opportunity to ask questions of the F.S. people, I can't hear their responses due to everyone talking around me."*

Agency Responses

A): Comment is noted. The meeting hosted by the US Forest Service at the Riceville Community Center on April 26, 2007, from 4 pm to 7 pm was an open house format. Attendees were able to provide written comments at the open house.

B): The format for the meeting was established by the Responsible Official. The purpose of the open house was to allow the public to ask specific questions about the proposed action to insure they had a clear understanding and be able to provide meaningful comments early in the process of the environmental analysis. This type of meeting is an effective format for ensuring Agency representatives receive specific comments/concerns from members of the public. The Appalachian Ranger District has hosted similar meeting formats in 2004 and 2005 on similar proposals in Madison County.

Move the Gate

Representative Group of Comments Received

A): "*Moving the gate with a parking area in the front would be fine."*

B): "*One gate should be enough at the original entrance. Hunters must get game land use permit to hunt and there is no place to park (there are no parking signs on side of road and no room to park)."*

Agency Responses

A): The proposed action addresses this comment.

B): The original location of the gate was at the junction of Forest Service Roads 220 and 220A. The area was large and provided too much opportunity for unauthorized recreation and garbage dumping. The proposed action was designed to provide increased access over the current situation, while limiting the opportunity for past adverse impacts to occur.

No Action

Representative Group of Comments Received

A): "*The public will not stand for <u>any</u> logging of Federal lands. Our lawmakers are <u>systematically</u> pushing locals out of our native habitat."*

B): *"The area needs to be preserved not destroyed. We don't need more roads in the forest. We don't need logging and additional traffic on these residential roads used by runners and cyclists and children."*

C): *"I am personally skeptical as to how cutting down trees and spraying poisons across the mountainside could help anything."*

D): *"Save the forest, if not for you and me for our children and grandchildren. Save it for the bears and ecosystems."*

E): "*With increasing population pressures, the best approaches to land stewardship and land management for the Shope Creek area must be realigned with activities such as outdoor recreation and education that are compatible with maintenance of a high quality natural area and must turn away from activities such as road building and timber harvesting that are fundamentally inimical to the future of this area as an example of the high quality habitats of the Craggy Mountains."*

<u>Agency Responses</u>

A): The harvest proposal was developed to meet Forest Plan objectives for the area and would not push locals out. Even though some folks are opposed to the harvesting of timber, we received comments from many folks who are very supportive of this type of management.

B): The proposal would not destroy the area and would not construct new roads. The No Action alternative will be evaluated. We are conducting an environmental analysis and field surveys to insure we understand the effects of the proposed action. Through this analysis, we will verify whether we can implement the action while protecting the quality of the environment. There may be effects, but they should remain non-significant.

C): To achieve the goals of the forest plan (including the creation of more diverse wildlife habitats) requires action in areas such as Shope Creek. Our environmental analysis should disclose how the project fulfills the purpose and need of improving these habitats in the area. Also see Herbicide Use and Invasives sections above and Wildlife Habitat/Populations section below.

D): Our proposed action shows that we are working to provide a variety of quality forest conditions in the area (including old growth, a variety of wildlife habitats, quality hardwoods and hard mast production, protecting water quality, and improving access for people to enjoy the area). The proposal should be beneficial for wildlife, particularly bears, while protecting the health of the forest overall.

E): As stated above, the proposed action was designed to implement the goals, objectives, and direction of the Pisgah Forest Plan. It is through the forest plan where land management direction such as proposed by the comment are developed and decided on. The proposed action would not prohibit a future option of changing overall management direction for Shope Creek during revision of the forest plan.

No Harvesting

<u>Representative Group of Comments Received</u>

A): "*I grew up playing along side and within the contested forest and know of many beautiful areas. What makes them so beautiful to me is they're untouched pristine old growth beauty. Any areas that we can keep as untouched areas that has been left to grow and develop as nature intended the better."*

B): "*I know a man who has offered to use his own equipment to help move the gate and make the 3 to 5 vehicle parking access area free of charge or for very cheap maybe $100 at the most. If you go with my proposal NO trees would have to be cut and harvested."*

C): *"I whole-heartedly oppose the logging of Shope Creek Forest for the following reasons: (1) The Forest Management Plan that is dictating the harvest does not reflect the current needs of our community – neither ecological, recreational, nor economic; (2) The wildlife in Shope Creek Forest is some of the healthiest I have seen and does not need help; (3) This is the only piece of N.F. available to the booming Swannanoa Valley; (4) These mountains are under assault from development and what is in the public domain should be left alone until we see the full wildlife effect of the boom; (5) The USFS uses tax dollars to subsidize logging, the profit of which our community will never see; (6) Shope Creek is a healthy watershed that is connected to two other watersheds, the BRP N.P. and is part of the U.N. Biosphere Preserve of the Black Mountains; (7) The USFS, especially under the current administration is failing to provide the stewardship of our public lands."*

D): *"In my view there should be no clearcutting on Shope Creek. Most of the good timber was cut years and years ago."*

E): *"Further, I have seen many of such two-age harvests in the forests of Western North Carolina and find that they rarely generate anything more than tulip poplar and red maple, two wind-dispersed species that are much more successful at colonizing highly disturbed, open habitats than animal-dispersed oaks and hickories, two species that are more desirable from both a hard mast and timber quality standpoint. These two-age harvests must be recognized as a failure in obtaining the desired future conditions of forest management plans."*

Agency Responses

A): The Shope Creek area has been logged in the past (from 1880 to 1991) and the lower portion of the NFS lands were farmed prior to Forest Service acquisition – they are not pristine (untouched or unmanaged). About half of the NFS lands in western North Carolina are unsuitable to harvesting (47%) while about half are suitable for harvesting (53%, Forest Plan, pages III-54 – III-56). The Shope Creek area is within Management Area 4D, which is suitable for harvesting (Forest Plan, page III-78). See also Old Growth Section below.

B): While we appreciate the offer, moving the gate would address only one part of the stated purpose and need for the project. To create the early successional habitats for wildlife requires timber harvest and management of the vegetation.

C): (1) The Forest Plan provides the guiding rationale behind the proposal and it was developed under extensive public involvement in the 1980s and 1990s. The Forest Plan is scheduled for revision in the next few years and any changes in the future management direction for Shope Creek would be made through that process. We are required by law to manage an area to comply with current forest plan direction unless that direction is changed through revision or plan amendment. (2) See Wildlife Habitat/Populations Section below. (3) While the Shope Creek area is the closest NFS lands to Swannanoa, it is certainly not the only NFS lands available to residents of Swannanoa. (4) See Comment A and Agency Response above. (5) The action is not proposed in the interest of making money or subsidizing logging operations. This project is designed to respond to very specific resource needs in the Shope Creek area. Given that the actions may require removal of timber and some road reconstruction work, our most appropriate source of getting that work done is through contractors, such as timber harvesting contractors. We complete an appraisal of the work to determine the appropriate base price for the work. Keep in mind that many folks working in the timber industry live in our local communities; their income goes into the economy of the community. (6) We are aware of the proximity of Shope Creek to the Asheville watershed and the Blue Ridge Parkway; we have contacted the representatives of both to determine their concerns with the proposal. The Agency is unaware of the Shope Creek area being added to the U.N. Biosphere Preserve of the Black Mountains. The proposal would not convert forested land to agriculture or development – post harvest, the area would remain forested. (7) The Agency respectfully disagrees and believes the proposal is a sound management option for meeting Forest Plan objectives.

D): The proposal does not clearcut– the two-age regeneration stands would leave at least 15-20 ft^2 of basal area per acre and likely more in some stands to meet partial retention visual quality objectives.

E): Generally, hardwood tree regeneration after harvest depends primarily on what sources of regeneration existed in the stand at the time of harvest. This is determined by preharvest overstory species composition, site quality, and disturbance history. Oak/hickory regeneration is often distributed unevenly within stands. There are many instances on the National Forests in North Carolina where oaks and hickories have been successfully regenerated in portions of stands regenerated by a two-aged regeneration method. One cannot judge the success or failure of any regeneration method without knowing what the preharvest stand conditions were. For example, a stand located at the lower one-third of the slope and consisting primarily of yellow-poplar in the overstory would most certainly be naturally regenerated to yellow-poplar under most regeneration methods. The proposal also includes follow-up timber stand improvement (TSI) treatments to promote oak and hickory.

No Harvesting Hardwoods

Representative Group of Comments Received

A): "*I hate to see the timber cut out. I understand about berry bushes and such. But you should only take out the pines that are infested with bugs.*"

B): *"I feel less strongly about the white pine stands since they are closer to the existing maintained roads and they are not native. Thank you for planting apple and hardwood trees in place of the pines."*

C): "*The oaks and hickory in the proposed areas need to be left alone.*"

Agency Responses

A & B): An alternative that harvests only the white pine stands will be evaluated.

C): Our goal with the proposed action is to continue promoting the growth of oaks and hickory in the treated areas. This will help achieve the production of hard mast for wildlife.

Old Growth

Representative Group of Comments Received

A): "*I feel that there should be more than 50 acres of designated old growth; this is not a sufficient amount to promote even adequate biodiversity.*"

B): *"Leave all old and mature stands."*

C): *"The areas that were previously logged should be where the Forest Service cleans up and creates revenue. Leave the old growth alone."*

D): *"I advocate for the least removal of forest and no removal of older growth forest."*

E): "*I would like to address a key assertion in this proposal, viz. that there is not enough early successional habitat within the area under consideration. I believe that it is important to consider the scale under which human activities occur in our area and recognize that a landscape-level approach is critical in maintain the health and resiliency of our national forests. In this case, one must understand that early successional habitats dominate the land area outside of the national forests and therefore the national forests should be managed to contain a preponderance of late successional habitats to compensate for the nearly complete absence of late successional habitats outside the national forest. This is a particularly important principle of land stewardship in the Craggy Mountains because 1) it is under the control of many disparate agencies (Mt. Mitchell State Park; Asheville, Woodfin and Montreat municipal watersheds; Blue Ridge Parkway; the private hunting reserve in the Cane River; National Forest; and other small private landholders) all of which have divergent concepts and capacities regarding land management and stewardship and 2) these mountains are being increasingly encroached by urban and suburban development that bring with it the disruption of wildlife habitats and the spread of exotic pests and exotic invasive plants. I believe that, particularly in the Craggy Mountains, the national forest lands should be predominantly late successional habitats that offer greater resilience to exotic invasive species, among other benefits."*

F): "*Designating stands cut 20 years ago as "old growth" while taking existing "undesignated" old growth is misleading – at least."*

Agency Responses

A): The proposal would designate 50 acres of small patch old growth communities in Compartment 23 and 50 acres in Compartment 24 (100 acres total). This was stated in the April 19, 2007, scoping letter.

B, C, and D): Stands in the Shope Creek area have been previously logged – some as recent as about 15 years ago, some over a 100 years ago. The oldest average stand proposed for harvesting is about 80 years. There are more than 200 acres of stands greater than 80 years not proposed for harvesting. The proposal also includes 100 acres of small patch old growth designation. An alternative that eliminates harvest of any older or mature stands will be evaluated.

E): The Forest Plan strategy of designating large, medium, and small patch old growth areas was designed to meet the needs of old growth dependent species and other old growth related attributes. The project complies with the forest plan direction for providing that level of old growth. If this forest-level strategy should be changed to include more or less old growth across the landscapes, that would be determined through the forest plan revision process. For the proposed action, we follow current Forest Plan standards, which state: *schedule to revisit each compartment at 10 to 15 year intervals* (Forest Plan, page III-85) and to disperse early successional habitat (0-10 year age class) within compartments and analysis areas *not to exceed 10%* (Forest Plan, page III-31). There is currently no 0-10 year age class habitat on NFS lands in the Shope Creek area and the last entry that established even-aged habitat was in about 1982. See also Invasives Section above.

F): Stands harvested 20 years ago are not proposed for designation as small patch old growth communities. Stands proposed for designation in Compartments 23 and 24 average 105 and 73 years in age respectively as identified in the Forest Service's Continuous Inventory of Stand Conditions (CISC) database.

Post-logging Rehabilitation

Comment Received

A): "*What are guarantees/insurances that logging company will harvest in a sustainable manner, remove slash, return roads in a natural condition, restore culverts, stream beds, etc.?"*

Agency Response

A): Prior to harvest-related activities, the logging company that receives the high bid is required to sign a contract that outlines specific actions required by the Forest Service, such as erosion control measures, protection of trees identified for retention, and performing no operations at certain times of the year or weather conditions. The Forest Service Timber Sale contract is a time tested document that can be modified to fit each sale environment and all requirements contained in the decision document developed via this NEPA process. The contract is enforced by a Sale Administration team, consisting of a Contracting Officer, Forest Service Representative, Sale Administrator, Harvest Inspector, and if there is road work an Engineering Representative. Each of these positions require training, years of experience and certifications prior to taking an active roll in administering a timber sale. Sale Administrator and Harvest Inspector monitor harvest-related activities and ensure all contractual requirements are followed. If violations of the contract are identified, the contractor is notified of the infraction and is required to make amends within a set period of time. If there are serious enough infractions, the contractor can be placed in breach, shut down, lose a

portion or their entire performance bond, and/or lose their ability to bid on timber sales in the future. Prior to closing out the contract, the contractor is required to ensure the area meets all contract requirements to Agency standards for such items as slash control, stabilization and seeding of all disturbed soil, and road maintenance. Our forest has a history of success in administering contracts such that the environment is protected.

Provide Access

Representative Group of Comments Received

A): *"Also I agree with making or building a parking lot to allow the general public to use this property. I am a Boy Scout leader, until about six years ago, I would take our Scout Troop to Shope Creek for hiking and backpacking. However, due to one person at the end of the paved road, Boy Scouts cannot access this public property."*

B):" *How can the needs and desires of one private landowner trump the needs and desires of the many taxpayers who want to access these public lands? This area is effectively cut off from public use by anyone other than those few who are close enough to walk. This is not an acceptable situation and steps should be taken immediately to open access. We should not have to wait another year and a half for the gate to be relocated so we can have access to these public lands that we are supporting now with our tax dollars. Please do something!"*

Agency Responses

A): Comment noted. The proposed action should resolve this problem.

B): The gate could be moved before implementation of the vegetation proposal, but a decision and NEPA analysis need to be completed prior to moving it.

Provide Parking

Representative Group of Comments Received

A): "*I support public access to our public lands – parking on USFS land at the end of Shope Creek road."*

B): *"Three to five spaces for parking cars is far too little, as demonstrated by the fact that, at present, the number of vehicles parking on private land can be a dozen or so."*

Agency Responses

A): The Proposed Action addresses this comment.

B): The proposed gate location is such that an existing small clearing would be used for parking. This area appears to be able to accommodate anywhere from 3-5 vehicles.

Rare Plants List

Comment Received

A): "*Plants – rare list."*

Agency Response

A): An analysis of effects the proposal may have on rare plants (federally threatened & endangered, Regionally sensitive, Management Indicator, and Forest Concern species) would be completed by the project Botanist and disclosed in the EA. This analysis would be based on the field surveys completed by the botanist.

Recreation Access/Development (trails)

Representative Group of Comments Received

A): "*Create public access for burgeoning recreational population. Hikers and mountain bikers will build and maintain trail systems. Forest Service can still do the right thing!"*

B): *"Let's focus on building trails and improving access on the roads that already exist throughout and leave some areas to the bears."*

C): *"Have you considered developing a recreational multi-use trail system? Even trail access from the Blue Ridge Parkway."*

D): *"Please ensure that mountain bike use is allowed on existing road system and consider involving mountain bike groups in any future recreational development."*

E): "*Horses – my opinion is that this area is not really suited for horses. A vehicle with horse trailer would take up all the parking, the streams in the area would more than likely be adversely affected by horses, and the rideable area is quite small. There are only a few trails branching off of the main road, and they all go uphill, some quite steep.*"

Agency Responses

A): The proposed action is designed to provide access for the recreating public into Shope Creek. However, at this time, there are no plans to develop additional trails. Hikers and mountain bikers will be expected to remain on the existing trails and/or roads.

B): Non-motorized recreational activities currently approved would be able to continue in the Shope Creek area following implementation of the proposal; however additional multi-use trails are not proposed at this time (see also Comment A and Agency Response above).

C): Additional multi-use trails are not proposed, including trail systems that access the Blue Ridge Parkway. Before any trails are developed that access the parkway, the National Park Service would need to decide if trails on the parkway lands are appropriate (see also Comment A and Agency Response above).

D): Comment is noted. Current non-motorized access would continue following implementation. There would be public involvement should future development of additional multi-use trail systems be proposed.

E): The area is currently open for equestrian access (along with other non-motorized access) and the proposal does not change this. If future monitoring identifies adverse impacts from equestrian (or other allowed non-motorized use), a separate analysis and decision could address the problems, including restrictions to some uses.

Road Construction/Reconstruction

Representative Group of Comments Received

A): "*You should hold off plans for the roads until you know if they will be needed. This is especially important near creeks.*"

B): "*Please do not* [c]*onvert the overgrown roads back into logging roads.*"

C): *"We already have ATV use coming over from Bee tree and motorized dirt bikes. Adding or reclassifying roads in Shope Creek will increase opportunity for usage."*

D): "*Also the current paths/roads are only two feet wide. What is going to be done to these roads for "reconstruction"? What about the paths/roads that are near the streams?*"

E): "*The proposal for road construction is perhaps the most egregious misstep of the proposal. Why, for example, are roads proposed for construction beyond the currently proposed stands for two-age harvests? If they are built with the intent to harvest timber from the higher elevation areas that have high quality timber (black cherry, e.g.) then this should be stated and public opinion solicited. I would support trail work in the area, but roads are unnecessary and only provide a corridor for perhaps the most pernicious exotic invasive species of the Craggy Mountains, Micrastegium, the Japanese grass which has the ability to invade intact, mature, closed-canopy forest when provided a corridor such as a road.*"

F): "*The need to improve fish habitat does not require roads. At this point it does not require any action. All of the hemlocks in the area are infected with adelgid and will be dead soon. As they fall across the creek, the pool: riffle ratio will be increased.*"

Agency Responses

A): The roads that would be reconstructed have been identified as necessary for this proposal. This determination was made through the project-level roads analysis process (RAP) which included public comments. There are unauthorized roads and segments of unauthorized roads that would not be used for this proposal – they would be placed on the Forest's transportation system for future access needs. Only those roads needed for the proposed action, including the segment identified for decommissioning or needing work to protect water quality would have any work done on them at this time.

B): The overgrown roads (unauthorized roads) are necessary for access to stands scheduled for harvest. The No Action Alternative would maintain the roads in the current condition.

C): The NFS lands in Shope Creek are currently closed to public motorized access. As stated in the April 19, 2007, scoping letter: *Forest Service personnel would work closely with state, county, and municipal law enforcement agencies to manage/control use in the area*.

D): The two foot width is the path kept clear of vegetation by recreationists—the existing road prisms are considerably wider. Reconstruction includes a range of activities depending on the condition of the road. The classified system roads (220 and 220A) would require very little work, possibly some spot gravel in places. Some of the unauthorized roads would require a bull dozer to correct previous drainage problems; some culverts have been damaged or removed and would need to be replaced; and some spot gravel may need to be placed. Following harvest-related activities, the unauthorized roads would be disked, seeded, and placed on

the Forest's transportation system for non-motorized use as well as future administrative access needs. There would be segments of existing roads used that are near streams. Erosion control measures such as seeding disturbed soil, silt fences, straw bales, and ceasing work during excessively wet weather and rain events would be enforced. These preventative measures are a part of the North Carolina Best Management Practices and Guidelines as well as Forest Plan standards and guidelines.

E): There is no road construction proposed—all roads scheduled for use are currently established in the area (they already exist). See also Comment A and Agency Response above and Invasives Section above.

F): The stream improvement is not related to road management. The proposal to fell trees for stream and aquatic improvements recognized that natural tree falls in some segments would provide the large woody debris overtime. However, to see immediate improvements, we propose to fell some trees in the lower reach of the stream. See also Insects/Disease Section above.

Roads Analysis Process

Representative Group of Comments Received

A): "*At present there are two fords that cross the stream in the lower reach of the creek. These two fords limit movement of fish, particularly to upper reaches of the creek. Improving habitat in the lower reach would be more effective if the fords at each end of the area to be improved were removed.*"

B): "*Please accept my comments in regard to the Shope Creek Project Proposal dated April 19, 2007. I have many concerns about this project. There was a roads analysis proposal for this area which has not been completed to NEPA specification. The NEPA process on the roads analysis should occur before any other proposal can be considered in the project area.*"

Agency Responses

A): The first ford near the gate is on private land and not part of NFS lands (see also Bridge Constructed on Shope Creek Section above). The second ford is on NFS lands. The ford on NFS lands would be accessed for administrative purposes and very infrequently—there would be very limited potential for adverse aquatic impacts to occur long-term. As stated earlier, measures to protect water quality at these crossings are being considered, including the use of bridges.

B): The roads analysis process was initiated in late March to solicit public information on road access management in the Shope Creek area. The roads analysis is an assessment of existing roads in the area to evaluate the need for these roads; this type of assessment does not go through the NEPA process. Only when an action is proposed to occur with a road (such as construction, reconstruction, or decommissioning) is the NEPA process started. The environmental effects of any road work proposed with the Shope Creek project will be included in the EA.

Scenery

Representative Group of Comments Received

A): "*The previously harvested compartments are easily observed from the Blue Ridge Parkway overlook at the base of Rocky Knob.*"

B): *"We would support the designation of the entire section of forest adjacent to the parkway and at the headwaters of area streams to preserve scenic views and the integrity of water quality in the area."*

Agency Responses

A): A comprehensive scenery impact assessment would be conducted using Visual Management System & Scenery Management System methodology, including GIS viewshed analysis, 3D simulations, and field surveys. The scenery analysis would determine site-specific design elements necessary to comply with Forest Plan scenery standards for proposed activities in their respective Management Areas, and determine the appropriate leave-tree density needed to meet assigned Visual Quality Objectives for each treatment area.

B): The area in question is currently designated as MA 4D and is suitable for timber harvesting. Future revisions of the Forest Plan may change this designation, but it is designated as suitable today. Any management activity along the Parkway would need to meet at least partial retention scenery objectives.

Stream Buffers

Comment Received

A): *"I'm concerned about sedimentation and runoff in the streams. Please put in place a 100' riparian buffer."*

Agency Response

A): Forest Plan standards state: *Use an interdisciplinary team to identity and map riparian management area based on field observation of riparian characteristics such as floodplains and vegetation. and riparian related values discussed in the riparian area description. Until identified consider riparian areas as 100 feet (horizontal distance) on each side of a perennial stream or around a lake* (Forest Plan, page III-181). Stream buffers are expected to be 100 feet in the Shope Creek proposal except within stands 23-12(A) and 23-12(B) where they would be 30 feet to allow for more white pine removal to ensure hardwood establishment and riparian enhancement.

Support for Proposal

Representative Group of Comments Received

A): *"I think this is a well thought out plan with laudable objectives. I hope that you have the opportunity to see it carried out. I appreciate the thoroughness of the planning and the consideration that has gone into it."*

B): *"As a grouse and deer hunter I support the project. This area is game lands and needs to be managed for hunting. Cutting trees is good for grouse."*

C): "*I am in agreement with Biologist Brooks, there is a lack of diversity in the younger ages of many public land tracts and this modest proposal and the efforts to eradicate invasive species seem very reasonable."*

D): "*I strongly recommend that the harvesting proposal be implemented. In fact, if possible I would like to increase the acres regenerated. There is nothing unique about this tract, and harvesting timber will do nothing but help the overall wildlife situation. The people screeching about adversely affecting wildlife habitat and fishery habitat, for the most part, are hard core preservationists and don't want the Forest Service to harvest timber anywhere. I am a certified Wildlife Biologist and a Certified Fishery Scientist, and would be most happy to debate the issue with the Center for Biological Diversity's ecologist."*

E): "*We strongly support the Shope Creek Project but, as a hunter and conservationist, are disappointed that you are not taking the opportunity to provide additional early Successional Habitat in the project. Besides increasing the acreage of the cuts, we recommend: All patches be less that 20 Basal Area in order to provide cover that numerous scientific studies prove are critical for Ruffed Grouse and other wildlife. Increase the number of wildlife openings in the project; not just use the log decks, etc. Include a 100 ft. ESH buffer around all new and reclaimed wildlife opening. We support the use of herbicide as required and the building of roads necessary to implement this project."*

F): "*It is likely that this project will greatly enhance wildlife diversity in the project area, particularly with regard to songbirds. The complete lack of early successional habitat in the project area obviously precludes a whole suite of species. Additionally, the North American Breeding Bird Survey indicated that, from 1980-2005 in the Blue Ridge Mountains, 40 songbirds breeding in early successional habitat declined, while just 16% of mature forest songbirds declined."*

Agency Responses

A, B, and C): Comment is noted.

D): The District will re-evaluate the area to verify whether additional areas are feasible for increasing the amount of early successional habitats.

E): See Comment D and Agency Response above. Some portions of stands may have less than 20 ft^2 of basal area per acre, but due to resource concerns, including scenery; basal area is expected to be higher in the majority of the stands. No road construction is proposed. An additional 100-foot buffer around wildlife openings is not necessary due to the two-age harvest areas providing early successional habitat.

F): The Forest Service strives to provide a diversity of habitat for a wide range of wildlife species. While this project area is too small to change the trend across the southern Appalachians, it is one of several projects proposed across the Pisgah and Nantahala Forests that may provide the habitat attributes for songbirds.

Thin Without Regeneration

Comment Received

A): *Selective cutting would be better – not clearcutting.*

Agency Response

A): The project does not include any clearcutting. The ID team has evaluated unevenaged systems such as selective harvest and determined that the proposed even-aged systems of two-aged harvest is necessary to achieve the stated purpose and need.

Timber Stand Improvement

Representative Group of Comments Received

A): "*I would also love to see a plan for how the sanitation harvest site is going to be properly regenerated to hardwoods.*"

B): *"The sanitation cut is for what pest? What type of regeneration plan for stands 23-12(A) and 23-12(B)?"*

C): "*Sanitation harvests of white pine are perhaps a good management practice if they are conducted correctly. White pine is not native to the area and is present owing to land reclamation efforts of the earlier parts of the last century. Removing the white pine would open up the canopy in a part of Shope Creek that is already heavily infested with white pine, exacerbating an already serious problem. Further, oak and hickory will not replace the white pine unless they are actually propagated and planted in the cut area in sufficient quantity with follow-up removal of competing herbaceous plants for a significant time period following planting. These animal-dispersed species cannot be expected to compete with wind-dispersed species such as tulip poplar and red maple for establishment and recruitment of juveniles.*"

Agency Responses

A): In Stand 23-12(B) hardwoods would be regenerated by planting advanced northern red oak seedlings (about 3-4 feet in height) with some white oak seedlings. These seedlings would be released by applying Triclopyr and Glyphosate herbicide and using hand tools as needed to control the non-desirable, competing vegetation and ensure survival. There would be enough residual hardwoods in Stand 23-12(A) to provide sufficient regeneration. Timber Stand Improvement (TSI) activities, as stated in the proposal, would also help ensure proper hardwood regeneration. The removal of white pine and replacement with hardwoods enhances riparian areas, habitat for black bears, and overall habitat diversity.

B): White pines are especially susceptible to southern pine beetle and annosum root rot. A sanitation cut would serve as a preventative measure.

C): See Comment A and Agency Response above.

Unauthorized Roads

Representative Group of Comments Received

A): "*I question the need to place the 4 miles of unauthorized roads onto the Forest's transportation system.*"

B): "*Also, currently undesignated road I and H are two feet wide paths next to the river in the middle where they fork off FSR 220 and using these in future administration or for future timber harvest would negatively affect the water quality. Why is timber stand 23-11 off road E if there are no plans of widening what is now a two foot path? How will you get the timber? That also stands for stand 24-11 in regards to road D? Isn't road E and D the same path?*"

C): *"The plan states that the unauthorized road sections are to be seeded with an 'appropriate seed mix'. My concern is that this "appropriate seed mix" be beneficial to wildlife. Whitetail deer do not eat grass. They eat forbs."*

D): "*The addition of 1 mile of graveled road is unacceptable when there are existing FS roads in need of maintenance (Hickey Fork!).*"

Agency Responses

A): The four miles would be placed on the Forest's transportation system because they are all needed for long-term future access. The Shope Creek area is designated as Management Area 4D – these lands are scheduled to be revisited in a 10 to 15 year interval (Forest Plan, page III-85). Not all four miles would be used for this entry – about 2½ of the four miles would be used.

B): The two foot width is the path kept clear of vegetation by recreationists—the road prisms are considerably wider. Prior to using these (and all roads) Forest Plan standards and guidelines (Best Management Practices) would be in place to reduce potential for adverse impacts to aquatic resources (Forest Plan, pages III-181 – III-189 and Mitigation Measures 51-58, pages Appendix I-9 & Appendix I-10). Stand 24-11 would be accessed from Unauthorized Road E; Stand 23-11 would be access from Unauthorized Road H. Unauthorized Road D & E are two separate roads and Unauthorized Road D would be decommissioned under this proposal as it is not needed for long-term access management.

C): The seed mixture used on landings, system roads, and unauthorized roads would be an erosion control/wildlife preferred mixture. The highest priority is to limit soil displacement and erosion, especially on the unauthorized roads which are going to be permanently closed. These unauthorized roads would be "put to bed" or closed where shading from trees on the shoulder of the road would increase to the point of canopy closure. The Forest recommended seed mixture for this analysis area is: tall fescue (fungus free only), Virginia wild rye, creeping red fescue, and red clover.

D): Placing gravel reduces potential for erosion/sedimentation to occur and reduces long-term maintenance costs. The reconstruction proposed in Shope Creek is necessary to implement the proposed action.

Water Quality/Sedimentation

Representative Group of Comments Received

A): "*As of three years ago, I could drink out of these streams without iodine or filters.*"

B): "*Any cutting will warm the pristine stream that my child fishes and plays in.*"

C): *"Please investigate the relative proximity of the current roads to water wells and the possibility of a standard buffer for these areas to ensure they are well away from the water when they are reconstructed."*

D): "*I own the trout farm located at the end of Shope Creek Road. Sedimentation runoff in the creek above my intake dam for my trout farm is of great concern. I request any approved plan incorporate reduction of potential sedimentation runoff."*

E): *"Another oddity within the proposal is the falling of trees into Shope Creek, "woody debris", to "create riffles and stabilize the stream banks". Now, I've not traveled every inch of Shope Creek, but I've yet to find it wider than 10 feet and not full of rocks. There's plenty of woody debris already in this stream and if you want more simply throw the existing deadwood along its banks in it and leave the standing trees alone! The standing trees you seek to cut provide the shade that maintains the creek's temperatures and their roots stabilize the banks. This is pretty basic stuff, you know?"*

F): "*We believe this activity is unnecessary* (felling trees into Shope Creek). *Hemlocks will continue to decline in the area and will likely contribute a significant amount of woody debris into the streams."*

Agency Responses

A): The current condition of the streams should not be degraded with implementation of the proposal due to adherence to Forest Plan standards (Best Management Practices) and Mitigation Measures (see also Comment B and Agency Response to Unauthorized Road Section above).

B): Stream temperatures are not expected to increase with implementation of the proposal because streams will have a 100 foot buffer applied to them except for Stands 23-12(A) and 23-12(B) where white pine up to 30 feet from the stream may be removed. The additional white pine removal is to provide more opportunity for hardwood species to become established along the stream. The shade currently on the streams in the area should be retained following the project such that temperature increases are negligible.

C): There are no permitted spring boxes or wells located on NFS lands. Any road reconstruction that occurs within the area would follow North Carolina Best Management Practices and Forest Practice Guidelines listed in the Forest Plan which would minimize impacts to aquatic resources within the area. Since there are only two new stream crossings, and these crossing would be bridges, there will not likely be any impacts to water quality from this project.

D): The utilization of NC Best Management Practices, Forest Practice Guidelines and riparian buffers along streams would prevent the off-site movement of soil into analysis area streams. Bridges would be used to cross Shope Creek and an unnamed tributary to Shope Creek to minimize impacts to the Shope Creek watershed. Riparian buffers, which are 100 linear feet on perennial streams, 15 linear feet on intermittent and ephemeral channels, would protect water resources during harvesting. The proposed introduction of large woody debris into Shope Creek can be coordinated with the trout farm owner so that the amount of turbidity (caused when the logs stir up existing sediments within the stream bed) may be minimized and not cause problems at the intake.

E): Using existing wood in the area would not address the need to promote the growth of hardwoods within the riparian area nor would it address the issue of older white pines causing severe stream bank disturbance when they uproot during wind storms or due to disease. The lower section is primarily riffles with no pools and the wood would help create good pool to riffle ratio because there is a lack of pools not riffles. There is a lack of large woody debris within the lower section of Shope Creek due to past management prior to USFS acquiring the property. The lower section (at the USFS boundary upstream approximately ¼ mile) was historically a home site which was then converted into a white pine stand. White pine has little benefits for aquatic resources other than shade which will be maintained with the proposal because not all of the white pine within the stand will be cut. Hardwoods are optimal for riparian areas because they provide critical nutrients into the stream with their leaf litter and wood. White pine is prone to root disease and when they uproot within the riparian area they cause disturbance of soil due to the shallow and wide root system. White pine needles do not provide the nutrients or food into the stream system that hardwood leafs do. The introduction of wood will also provide valuable pool habitat that is of little existence within the lower section of Shope Creek. Pools are critical for resting areas for fish, rearing areas for young of the year trout and great depositional areas for burrowing insects and crayfish.

F): The 10 trees would be anchored to the stream bank to ensure they are not moved downstream during high flows. Trees left naturally to fall (including hemlocks) would likely not occur soon enough to meet objectives and may not hold in place during high flows. The trees felled would be anchored and placed where they would be best capable of meeting objectives. Experience in areas with larger streams during the high precipitation events of 2004 demonstrated that large woody debris that had been anchored were not dislodged by the high water levels. See Comment E and Agency Response above.

Wilderness Potential

Representative Group of Comments Received

A): "*Also by designating two foot paths (roads H, I, J, E, D, C, A, B, F, G) do we not lose the chance to designate wilderness areas in the future?"*

B): "*My proposal is to petition the appropriate persons in the federal government to designate the Shope Creek forest as a Wilderness Area—to be preserved in its natural condition and managed primarily to protect it from over usage by humans. The population of Buncombe County is growing by leaps and bounds. So much farmland and forest is being developed for human dwellings, and many of these developments destroy the naturalness of the wild areas where they are placed. We need to look forward and preserve what nearby woods and forests that are in public ownership, for the benefit of the public. Wild areas are necessary for human contentment—we need places to temporarily retire away from the noise and hurry of everyday life. It might seem that Shope Creek forest is too small for a Wilderness Area. In fact, most of the Wilderness Areas in North Carolina and the Southeast U.S. are too small, especially compared to western ones, to be what they were intended to be—places untrammeled by humans. We have hiked and camped extensively in the Shining Rock Wilderness and there are few places, however remote, where we have not found trash (cans, bottles, abandoned camping gear, tree stands, toilet paper, etc.) and ad hoc foot trails. I believe that the answer for the Southeast is more Wilderness Areas. An alternative might be for the Shope Creek forest to be offered for sale to the Southern Appalachian Highlands Conservancy. Shope Creek forest could reasonably be attached to the Blue Parkway to be included in the National Park system, but then that would exclude hunting—not a factor with Wilderness Areas since they allow hunting. In any case, the relative smallness of the Shope Creek forest, its proximity to Asheville, the uncommonness of its wild qualities, and the nearby watersheds, mitigate that it be preserved and be allowed to mature naturally rather than logged in any way. Especially, I am concerned about the development of roads ("improvement") that will cause erosion and increase access. It would very much harm the wildness and beauty of the Shope Creek forest to put down gravel on what are now woodland trails. Essential to Wilderness Areas is limited access. I would also suggest for an overall Wilderness Area plan for North Carolina that a permit system be implemented, including for Shope Creek. The permit is a way to educate people about Wilderness Areas (such as Leave No Trace principles) and to monitor usage. They also aid in search and rescue. And when necessary, permits can be a way to limit access. Limited access helps protect the natural qualities of pubic land—the water, mountains, and the flora and fauna. Part of the value of Wilderness Areas is simply knowing that they are there, even if one never sets foot in them."*

Agency Responses

A): The "paths" are actually old roads—the two foot width is the path kept clear of vegetation by recreationists—the road prisms are considerably wider. Wilderness designation is a Congressional action that is outside the scope of this proposal.

B): Wilderness designation is a Congressional action that is beyond the scope of this proposal.

Wildlife Habitat/Populations

Representative Group of Comments Received

A): "*I understand you are looking for places to create cerulean warbler habitat. However the survey of the area to see if there are suitable sites has not been done. I believe it would have been better to wait until you know where you may log for cerulean habitat before putting out this proposal."*

B): *"This also stands for promoting bear habitat, in that, the habitat is already there, and I have seen them there. I have been to other areas that have been cut (Case Camp) 20 years ago, and all that stands now is grape-vines and no bears in that specific area. Bears do not like people, they do not need roads."*

C): *"Please consider if there may be ways to achieve the wildlife management goals using current open land or a combination of currently open land and minimally logged open space."*

D): *"The argument that 10% of the forest needs to be open and in young growth for creating wildlife habitat – which may hold true in an area of large contiguous forest – does not hold credibility on this small forest patch in an area already fragmented. There are plenty of opened land, young forest in the surrounding landscape for wildlife."*

E): *"If this proposal goes ahead what little wildlife that remain will be destroyed."*

F): "*It is common knowledge that black bear and the cerulean warbler need old mature stands for dens and nesting. Both species are mentioned in the proposal...yet it is UNCLEAR if the proposal seeks to create soft mast & berry patches or intends to preserve existing undesignated old growth as well. Which is it?"*

Agency Responses

A): While cerulean warblers have been sited in the area above 3500-foot elevations and along the Blue Ridge Parkway, we have not proposed at this time any treatments to create openings for this songbird. The commenter is correct that sufficient surveys have not been completed to design a proposal for cerulean habitat work. Noted cerulean warbler expert Dr. David Buehler of the University of Tennessee is visiting the Shope Creek area later this summer with the project wildlife biologist to identify if there are habitat enhancement opportunities for the bird below the Parkway. If a proposal is developed in the future, the public will be notified and offered the opportunity to comment.

B): The Forest Service treats invasive species prior to harvest which greatly limits their ability to spread via skidder tires, etc. Bears eat grapes as an alternative food source during late summer through early fall. The Case Camp stand/s referred to are scheduled for timber stand improvement (TSI) to eradicate many of the stems (grape, Oriental bittersweet, and kudzu) limiting tree species in the stand. However, grape arbors up to ¼ acre would be left as habitat for bears, ruffed grouse, and many other wildlife species that utilize this food source. Bears do not require roads for travel; however, the soft mast food such as black berries are found along many road corridors which is why bears are commonly seen using interior roads. These roads will provide grass/forb habitat post harvest for a wide variety of wildlife species with little human disturbance while providing walking trails for people to enjoy wildlife viewing and access into the area.

C & D): Although there is considerable open, private land to the west of this analysis area, these acres fall into two distinct categories, farm land and residential. The residential areas are not preferred habitat of most forest wildlife species due to high levels of human disturbance, dogs, and cats. The grazing fields within the farm land are preferred habitat for several species, such as white-tailed deer, and many songbirds. Forested land surrounds the edge of these fields where escape from aerial predators is possible—these areas are utilized by wild turkey and shrub nesting birds. This analysis is being done for NFS lands where the Forest Plan determined that various wildlife habitat is desired to maintain large varieties of wildlife species found on NFS lands. The entire analysis area (Compartments 22, 23, and 24) is approximately 1,596 acres of NFS lands where this proposal would create early successional habitat on up to 68 acres (4%). The analysis area is surrounded by private lands to the south and west, the Blue Ridge Parkway to the north, and the Asheville watershed to the east. It is presumed that both the north and east habitats would remain unchanged as mature forest habitat.

E): NFS lands provide for a large variety of wildlife species, many of which require a variety of habitats throughout their life cycle. With the remaining estimated 69% mature forest (50-100 year old forest), the 17.5% 100+ year old forest, the proposed 100 acres of old growth designation, and the 4% early successional habitat, a diversity of habitats would be provided with the proposal. The existing wildlife populations will not be destroyed. There may be short-term effects where the animals move to avoid noise and disturbance, but our experience shows that following completion of similar projects and closure of the roads, the animals quickly move back in and begin utilizing the newly created habitats.

F): The known cerulean warbler occurrences along the Blue Ridge Parkway are found at overlook developments where early successional habitat is available. These sites exhibit mature forests surrounding early successional habitat which exhibits an increased number of invertebrate. We are working to survey the cerulean habitat and determine needs for treatments. However, there are no proposals at this time for treating any cerulean habitat. Black bear utilize a wide variety of habitats throughout the year, so an increase in the habitat diversity will enhance their utilization of the analysis area. A North Carolina demonstration of what can occur when acorn production fails in an older forest type was seen in 1997 when all oak species throughout the southern Appalachians failed to produce acorns. Black bears moving out of the Great Smokey Mountains National Park increased dramatically as they searched for an alternative food source. Forty Black bear were killed on Interstate 40 along an area called the 12 mile strip in their attempt to get to a source of food, such as managed forest lands.