



File Code: 1950

Date: October 6, 2000

Dear Interested Citizen:

The purpose of this letter is to withdraw my Decision for the Riley Cove project (Compartments 108, 110, and 111) on the Tusquitee Ranger District on the Nantahala National Forest. I signed the Decision for this project on July 31, 2000. A legal notice for the Decision was published in the Cherokee Scout in Murphy, North Carolina on August 1, 2000.

The draft environmental assessment for the Riley Cove project originally proposed eight areas for timber harvesting. Only two of these areas, located in the Muskrat Branch watershed, were carried forward under the final project decision. The current Riley Cove Decision would thin a 30-acre forested area, stand 111-11 and harvest an 11-acre area, stand 11-33, using a two-aged regeneration approach.

Stand 111-11, 30 acres, is a thinning "from below," in which smaller, suppressed and intermediate trees within the stand would be removed in order to enhance the vigor and growth of the remaining trees.

The other harvest unit, stand 111-33, is an 11-acre regeneration unit using the two-aged regeneration method. The objective of this harvest is to provide sawtimber and poletimber to the local market and, by natural regeneration, to establish a new young stand of high-quality southern Appalachian hardwoods. Both harvest units occur on gentle slopes and would be logged with a ground-based logging system. Road work would include no new road construction and 0.4 miles of existing road reconstruction.

The Decision also includes approximately 300 acres of prescribed burning for wildlife habitat improvement and restoration of a yellow pine component. In addition, my Decision designates approximately 110 acres for a future small old growth patch in Compartment 108.

To put this harvest proposal in perspective, please realize that the Environmental Assessment Study area encompasses 5,444 acres. The regeneration harvest in this Decision is 11 acres of the total. This is two-tenths of 1% of the project area, or 0.2%. Sustainable and environmentally sensitive timber management in Management Area (MA) 4D, of which the project area is a part, is also a goal of the Nantahala/Pisgah Land and Resource Management Plan (LRMP) and its amendments.

Upon appeal and review of the record we discovered that documentation for the sensitive species, *Cardamine flagellifera*, had not been carried forward into the Botanical Analysis (BOTA) and Environmental Assessment. Therefore I am withdrawing the Riley Cove Decision. At the time the botanical field work was conducted for the project, one plant species located in the thinning unit, stand 111-11, *Cardamine flagellifera*, was not on the Regional Forester's list of proposed, endangered, threatened, and sensitive species. Since the field work, the plant was placed on the list as a sensitive species. It was an oversight by the botanist in failing to include an effects analysis on *Cardamine flagellifera* in the BOTA. This species occurrence in stand



111-11 has not been addressed in the Botanical Analysis that was written for the project. In addition, there has been some concern about the yellowwood tree, *Cladrastis lutea*, that also occurs in stand 111-11. Some people believe this stand is a rare plant community. Our botanist and botanist/ecologists from the N.C. Natural Heritage Program and the regional office of the Nature Conservancy do not consider this species to indicate a rare plant community. They all consider yellowwood to be an excellent indicator of a high nutrient site.

I am thoroughly committed to conscientiously considering the resources, issues, and public concerns for this project. It is my intent to update the Riley Cove project botanical analysis (BOTA) and the Biological Evaluation (BE) to discuss and evaluate the effects of the proposed actions on the species mentioned in the previous paragraph. After reviewing this additional analysis, I will either reissue the Riley Cove decision with additional documentation, or make changes to the decision, if necessary, to ensure adequate protection for the above identified botanical resources.

Sincerely,

/s/ Charles N. Miller  
CHARLES N. MILLER  
District Ranger