August 26, 2019


Statement submitted by Friends of Panthertown, Inc. Board of Trustees and representing the various stakeholder groups and individual users of the Panthertown Backcountry Recreation Area located Jackson County, North Carolina, in Nantahala National Forest.

The mission of Friends of Panthertown is to work in partnership with the USDA Forest Service to conserve this outstanding natural resource while improving the quality and experience of recreational opportunities in Panthertown Valley. Our dedicated volunteers work throughout the year to maintain 30 miles of public, multi-use, non-motorized trails spread out over 6,311 acres.

National forests in Southern Appalachia are among the most popular in the country. The Pisgah-Nantahala National Forest in North Carolina is the nation’s second-most visited national forest system, with nearly 7 million visitors last year. According to the Nantahala District Ranger, more than twenty-five thousand visitors enjoyed outdoor recreation in Panthertown over the past year.

The USDA Forest Service is proposing sweeping revisions to its National Environmental Policy Act regulations by adding five new categorical exclusions and expanding one existing categorical exclusion related to infrastructure to its regulations for implementing the National Environmental Policy Act, which address common activities to manage infrastructure, special use permits, and restoration.

We, and the members of our organization, often visit Panthertown and our national forests to appreciate nature, spend time in the outdoors, create memories with our family and friends, enjoy the scenery, hike, swim, bike, paddle, fish, hunt, ride horses, backpack, rock climb, camp, explore new places, relax, watch wildlife, picnic, and enjoy access to our public lands.

In developing the Proposed Rule for 36 CFR 220, the Forest Service developed proposals for new categorical exclusions. The proposed categorical exclusions would be for restoration projects, roads and trails management, recreation and facility management, as well as special use authorizations that issue permits for resorts and outfitters and guides or for community organizations and civic groups.

According to USDA Forest Service, categorical exclusions identify actions that do not individually or cumulatively have a significant effect on the human environment and, therefore, do not require preparation of an environmental assessment (EA) or an environmental impact statement (EIS). We disagree with the proposed rule changes. We believe that the proposed categorical exclusions and actions WOULD have significant effects on the human environment and, consequently, SHOULD require preparation of an EA or an EIS.
We are strongly opposed to the U.S. Forest Service's proposal to add a series of new and revised categorical exclusions to 36 CFR Part 220, essentially cutting out public participation from the vast majority of its decisions. We want to have the ability to comment on and participate in ALL future decisions affecting Panthertown Valley. Our organization, and our members, have commented on forest plans, projects, or policies affecting national forests in the past. The current proposal would fundamentally change the relationship between the Forest Service and the public, cutting our voices entirely out of how to manage these special places.

We are most alarmed that the rule proposes to cut public participation from the vast majority of Forest Service decisions, and would allow large logging and prescribed burning projects (in areas as large as 4,200-acres each), pipeline projects, new road building projects, utility rights of way, and other decisions to happen behind closed doors and with very little public oversight.

The Forest Service should strengthen public involvement and focus on broadly supported work rather than attempting to bypass accountability for decisions that sacrifice the overall well being of our national forests. The public deserves the chance to raise issues or concerns so that those harms can be avoided.

According to a 2014 Visitor Use Survey for the Pisgah-Nantahala National Forest conducted by the USDA Forest Service, over 90 percent of our forest users are hikers, mountain bikers, paddlers, trail runners, and other nature-seeking outdoor enthusiasts. Without their input into future decisions, our forests will become less hospitable to the activities we all enjoy.

Outdoor recreation is a huge economic driver for our region and the Panthertown backcountry recreation area is a prime natural resource in Jackson County. The recently released Outdoor Industry Association’s Outdoor Economy Report shows that outdoor recreation in the U.S. generates $887 billion in consumer spending each year, supporting 7.6 million American jobs — they translate that to $28 billion in spending in North Carolina, $8.3 billion in wages and salaries, $1.3 billion in State and Local tax revenue, and 260,000 direct jobs in North Carolina alone. Maintaining a positive recreational experience in Panthertown directly impacts our region’s outdoor economy and ultimately provides for more funding for collaborative conservation efforts.

We appreciate the opportunity to participate in these processes and share our public comments.

Respectfully,

Margaret Carton, President
Mike Purdy, Vice-President & Trail Boss
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