June 29, 2020

U.S. Department of Agriculture Forest Service
Plan Revision Team, National Forests in North Carolina
160 Zillicoa Street, Suite A
Asheville, NC 28801

Re: Nantahala-Pisgah Revised Land and Resource Management Plan Revision #43545

Dear Forest Supervisor Allen Nicholas and Planning Team Leader Michelle Aldridge,

Friends of Panthertown is a non-profit organization that works under a volunteer service agreement with the U.S. Forest Service Nantahala Ranger District to provide volunteers and funding for trail maintenance, recreational improvements, resource protection, and conservation projects throughout the Panthertown Backcountry Complex ("Panthertown").

The mission of Friends of Panthertown is to work in partnership with the U.S. Forest Service to conserve this outstanding natural resource while improving the quality and experience of recreational opportunities in Panthertown.

The U.S. Forest Service is revising a Land and Resource Management Plan ("Forest Plan") for Nantahala and Pisgah National Forests that will provide a strategic framework for managing the Forests over the next 15 to 20 years. The Forest Plan will include desired conditions that describe what the public wants the National Forests to be in the future, and the objectives that describe the actions that the Forest Service will take.

Friends of Panthertown represents the stakeholder groups and users of Panthertown. The comments presented in this letter represent the collaborative results of more than 6 years of participation in the planning process, combined with feedback received from our members, volunteers, partners, stakeholders, and the greater recreation community. We are proud to partner with the U.S. Forest Service, the American Hiking Society, American Trails, Leave No Trace Center for Outdoor Ethics, and Public Lands Alliance.

Visitation to Panthertown is currently at an all-time high level and will continue to increase substantially over the next few decades. Sustainable use and stewardship of Panthertown will remain vital. Our organization is committed to protecting and maintaining this special place. We support managing Panthertown for its outstanding backcountry qualities and public benefits as outlined in our attached comments.

We appreciate the opportunity to have participated in the Forest Plan revision process, and to share our comments and recommendations. Thank you for your consideration.

In appreciation,

[Signature]

Jason Kimenker
Executive Director
On behalf of the Friends of Panthertown Board of Trustees
Panthertown is one of the most spectacular backcountry recreation areas in the southeastern United States, with cascading waterfalls, native trout streams, panoramic views, and sheer granite cliffs. It is a valuable natural resource providing extraordinary recreational benefits and is well known for its treasured and outstanding biological and geological features, including a rare high-elevation Southern Appalachian mountain bog, outstanding examples of granitic rock domes, and many unique species of flora and fauna.

The Panthertown Backcountry Complex (“Panthertown”), as depicted on the attached map, is located within the Highland Domes Geographic Area, primarily on Nantahala National Forest in southern Jackson County, North Carolina, close to the border with South Carolina and Georgia. More than 35,000 visitors come to Panthertown each year from throughout the southeastern United States and beyond to discover and experience the outstanding recreational opportunities and natural qualities found here. Panthertown attracts many outdoor enthusiasts including hikers, mountain bikers, equestrians, rock climbers, photographers, anglers and birders. Backcountry recreation is the primary use of Panthertown, and includes activities such as hiking, backpacking, primitive camping, mountain biking, horseback riding, rock climbing, fishing, hunting, canoeing, whitewater kayaking, and other low-impact, sustainable recreational activities.

Panthertown comprises 9,266 acres spanning National Forest lands from Toxaway Mountain on its southern boundary, to the Tuckasegee River near the mouth of Flat Creek on the northwest boundary, and contains an area known as Bonas Defeat on its northern boundary, and Big Pisgah on its eastern boundary on Pisgah National Forest. Within the Backcountry Complex is a recreation area known as Panthertown Valley, often referred to as the “Yosemite of the East”, a 6,311-area section of Panthertown featuring a 29.57-mile trail system maintained by Friends of Panthertown. Located north of the Turkey Knob and Rattlesnake Knob trailheads is an undeveloped backcountry area containing Hidden Falls, Flat Creek Falls, Buzzard Roost, Tritt Knob, Awl Knob, and an informal network of old logging roads and unmaintained user-created footpaths and social trails.

Panthertown protects the streams and headwaters of the East Fork of the Tuckasegee River, classified as Outstanding Resource Waters, and features the only catch-and-release section of the popular Western North Carolina Fly Fishing Trail®. Panthertown is known for providing a world-class fishing experience while protecting its native brook trout population.

Panthertown Valley is noted for its rare high-elevation Southern Appalachian mountain bog and high-quality granitic domes. The wetlands in Panthertown Valley are a series of swamp-forest bog complexes, seeps, and spray cliffs. The bog supports several state-listed rare and endangered species including Timber Rattlesnake and Baltimore Checkerspot Butterflies. The Panthertown Valley Bog was recently recognized by the Carolina Wetlands Association as one of their 2020 Wetland Treasures of the Carolinas.

Panthertown is designated by North Carolina Wildlife Resource Commission as part of the Panthertown-Bonas Defeat Bear Sanctuary. American black bears are protected here. Because of its outstanding geologic formations, protected wetlands, native plant life, and biologically diverse habitats for wildlife and rare plant species, Panthertown is designated as part of the Blue Ridge National Heritage Area and is recognized by The Wilderness Society as a North Carolina Mountain Treasure Area.
RECOMMENDATIONS FROM FRIENDS OF PANTHERTOWN

• Areas in the Panthertown Backcountry Complex (“Panthertown”) are best suited for Special Interest Area and Backcountry Management Area designations. The areas in Panthertown proposed in the draft Forest Plan as Matrix should instead be managed as Backcountry, while the core of Panthertown should remain as a Special Interest Area.

• The Forest Plan should reflect that backcountry recreation is its primary use and that Panthertown will be managed primarily with that use in mind. Recreation and conservation should be prioritized over increased timber harvests, with a focus on protecting its trails, clean water, scenic views, rare species, wild places, and old growth. The Forest Service should manage the Dismal Creek / Dismal Falls / Big Pisgah area on Pisgah National Forest as Backcountry with contiguous area in Panthertown.

• The Forest Plan should specify that vegetation and ecosystem management within the Panthertown Special Interest Area should recognize recreation values and be solely for the purpose of restoring and enhancing the ecological integrity and values of the area.

• Management of Panthertown should restrict prescribed burning and timber harvesting within 50 feet of system trails, kept outside of popular recreational corridors, and away from Special Interest Areas, unless such activities be deemed absolutely necessary to maintain the outstanding ecological qualities of Panthertown and/or such activities are essential for the maintenance of public safety.

• Panthertown Creek, Greenland Creek, and the East Fork of the Tuckasegee River (totaling 8.6 miles) should be reconsidered and found to be eligible for Wild and Scenic River designations to receive the maximum possible protections. The Forest Service should strengthen water quality protections and ensure that all Outstanding Resource Waters are named and protected in the Forest Plan. Stream protection standards should meet or exceed those currently set for other Southern Appalachian National Forests such as the Chattahoochee, the Cherokee, and the Jefferson.

• The Forest Service should protect existing old growth forest areas and restore other areas to expand old growth forests for future generations. Backcountry, Wilderness, and other similar areas should be included in the Designated Old Growth patch network. Adding existing old growth to the patch network should be prioritized.

• The Forest Plan should include stronger protections for rare, threatened, and endangered species, and dispersal-limited species. The draft plan fails to adequately address the impacts of increased timber harvests on rare and dispersal-limited species. The Forest Service should also adapt better timbering practices and improve road and trail maintenance to reduce erosion and sediment pollution. Forest roads that will be passively managed should be repurposed for trails.

• A comprehensive trail inventory should be conducted to determine which trails are most needed by hikers, mountain bikers, horseback riders, climbers, anglers and other trail users. The Forest Service should add those priority trails to the official system, and partner with recreation groups, such as Friends of Panthertown, to ensure that the trails are maintained and made sustainable.
OUTSTANDING RESOURCE WATERS AND NATURAL AREAS IN PANTHERTOWN

Panthertown’s wild and scenic streams comprise the headwaters of the East Fork of the Tuckasegee River in the Little Tennessee River Basin. The North Carolina Department of Environmental Quality Division of Water Resources has classified Panthertown’s waters as Outstanding Resource Waters, a watershed that has been determined to have excellent water quality, and exceptional ecological and recreational significance.

In Panthertown these Outstanding Resource Waters (ORW) on Nantahala National Forest include surface water classifications of Water Supply (WS-III) and ORW for Panthertown Creek (stream index 2-79-1), Greenland Creek (2-79-2), Little Green Creek (2-79-3), and Honeycamp Branch (2-79-4), each from their sources to the Tuckasegee River; and Frolictown Creek (2-79-1-1) from its source to Panthertown Creek, and Goldspring Branch (2-79-1-1-1) from its source to Frolictown Creek, and the east fork of the Tuckasegee River (East Fork Lake), classified as WS-III, Class B, Trout Waters, ORW, from its source at the confluence of Panthertown Creek and Greenland Creek to Tennessee Creek (Tanasee Creek).

Outstanding Resource Waters (ORW) are a subset of High Quality Waters (HQW), a classification intended to protect waters which are rated excellent based on biological and physical/chemical characteristics through Division monitoring or special studies. The supplemental ORW classification is intended to protect unique and special waters having excellent quality and being of exceptional ecological or recreational significance, such as these examples found in Panthertown. To qualify as ORW, waters must be rated Excellent by the Division and have one of the following outstanding resource values: outstanding fish habitat and fisheries, unusually high level of water-based recreation or potential for such kind of recreation, some special designation, important component of state or national park or forest, or special ecological or scientific significance (rare or endangered species habitat). Panthertown meets several of these outstanding resource values.

While a 100-foot buffer on perennial streams is good, the draft Forest Plan only affords intermittent streams a 15-foot buffer, and provides no protection at all for ephemeral streams. These are the types of streams that make up the very beginning of the watershed networks we depend on. Compare this to Cherokee National Forest in Tennessee, which has a default riparian buffer of 100 feet on perennial streams and 50 feet on intermittent streams, as well as some protections within 25 feet of ephemeral stream channels.

These buffers prevent stream banks from being degraded, provide shade, and reduce sediment pollution due to timber harvesting, road building, and other development. When these protective buffers are removed, water temperatures increase and sediment makes its way into streams and rivers. That excess sediment suffocates aquatic habitats and reduces populations of species such as trout, freshwater mussels, and hellbenders.

In addition to the state ORW designations, the North Carolina Natural Heritage Program has identified more than 2,400 natural areas across the state, including Panthertown. These areas were identified by biologists to contain the best examples of natural communities, species diversity, and rare species in North Carolina. A natural area is a site (terrestrial or aquatic) of special biodiversity significance due to the presence of rare species, unique natural communities, important animal assemblages, or other ecological features. The North Carolina Natural Heritage Program lists the rare animal species found in Panthertown, including Ameletus tertius (a mayfly) and Viehoperla ada (Pallid Roachfly).
PANTHERTOWN COMMUNITY VITALITY CONSIDERATIONS

Panthertown provides residents and visitors with an unparalleled opportunity for outdoor recreation in a backcountry setting. Outdoor recreation and tourism are the key drivers for our region’s economy. With millions of people visiting the Pisgah-Nantahala National Forest each year, ours is the second most visited national forest system in the country.

Outdoor recreation on our National Forests is a huge economic driver for our region. Outdoor recreation contributes significantly to the health and wellness of our communities.

According to the Outdoor Industry Association’s 2019 Outdoor Economy Report, over $1.66 billion was spent by residents of North Carolina’s 11th Congressional District on outdoor recreation last year. The 11th Congressional District is home to the Nantahala and Pisgah National Forests, and includes Panthertown. It is also home to more than 80 outdoor companies that contribute to our economy and to the conservation efforts of groups like Friends of Panthertown. Fishing, water sports, and camping are listed in the report as the most popular activities.

The Outdoor Industry Association’s report also shows that outdoor recreation in the U.S. generates $887 billion in consumer spending each year and supports 7.6 million American jobs. The Outdoor Industry Association translates that to $28 billion in spending in North Carolina, plus $8.3 billion in wages and salaries, $1.3 billion in State and Local tax revenue, and 260,000 direct jobs created and sustained in North Carolina alone.

According to research conducted on behalf of the Jackson County Tourism Development Authority, the largest driver of visitation to Jackson County is the great outdoors, with outdoor recreation on U.S. Forest Service managed sites like Panthertown Valley listed as one of the top activities for visitors to the region.

Research done by the Jackson County Tourism Development Authority in 2018-2019, shows that 10.3-percent of its overnight visitors (n=1,374) and 14.1-percent of its day trip visitors specifically stated they visited Panthertown Valley or other U.S. Forest Service managed land, on their visit to Jackson County.

Heritage tourism in the Blue Ridge National Heritage Area, including visits to Panthertown Valley, contributes $2.39 billion annually to the economy of the region, supporting more than 30,000 jobs and generating $176.5 million annually in state and local tax revenue, according to a 2014 economic impact study.

Maintaining positive recreational experiences in Panthertown, and throughout our National Forests, directly impacts our region’s economy, and the physical and mental wellbeing and vitality of our residents and visitors.
Panthertown Area of Nantahala and Pisgah National Forests

National Forest Lands of the Panthertown Backcountry Complex