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 November 20, 2020

Interested Folks,

The Pisgah Ranger District of the Pisgah National Forest is seeking public input on the **Graveyard Fields Project**. The Graveyard Fields area is located 25 miles southwest of Asheville, NC and ranges in elevation from about 5,000' to over 6,200' (see attached map). The Pisgah Ranger District is visited each year by millions of people who primarily experience the Forest through recreation, and more specifically through visiting destinations accessible by trails and similar infrastructure. The Graveyard Fields project seeks to restore, protect, and improve one of the most highly visited destinations on the District, known for its distinctive geography, natural communities, and waterfalls.

The project is divided into four primary categories of work: Heavy trail maintenance, trail relocation and construction, stream restoration, and red spruce restoration.

Purpose and Need

Heavy Trail Maintenance

Due to several factors, segments of trail throughout Graveyard Fields are in poor condition. Graveyard Fields is located at a high elevation within a temperate rainforest, where the soils are highly erodible, and the effects of freeze/thaw cycles are prevalent. In some cases, the improper location of trails and lack of sufficient trail maintenance has led to areas of entrenchment, causing further erosion and ponding in low areas. Trail users going around these ponding areas has significantly widened the trail, as well as leading to new user-created paths in particularly damaged areas. All of these issues are amplified with the high volume of foot traffic. These issues lead to a diminished visitor experience and resource damage. Regardless of this, increased visitation to the site continues, and the decline of trail system continues with it.

To remedy this, we plan to perform heavy trail maintenance. Heavy trail maintenance has already occurred on the nearby Ivestor Gap trail (TR101) and will soon be completed on the Graveyard Ridge Trail (TR356). Additional heavy maintenance is planned to take place on nearby trails that bear the burden of access and recreation in Graveyard Fields. Heavy maintenance would entail a range of activities restoring the trail to its previous functionality in the same location. This work often utilizes mechanized equipment and additional material brought to the site.

Trail Relocations

In addition to heavy maintenance, some segments of trail are best addressed by moving them to a more sustainable alignment. These select trail relocations would occur on parts of trails 356, 356A, and 358A (identified on map). Once relocated, these trails will be less susceptible to erosion and more easily maintained by eliminating "fall-line" segments and avoiding boggy areas.





Trail Construction & Access Point

Limited trail construction can further improve the visitor experience as well as improving the overall sustainability of the trail system. Trail construction would be designed to more widely distribute the use, create loop opportunities and provide another access point. Graveyard Fields is not likely to see a decrease in visitation, and therefore we must adapt to manage it differently. Our greatest opportunity for success is creating something that can be properly maintained while meeting the desires of visitors. The segments of new trail would seek to create a second route to a destination waterfall, create loops within the system that reduce traffic on existing infrastructure, and enable an additional access point that could absorb the demonstrated and consistent increase in visitation. In addition, this other access point and the associated trail could provide a point of access for mechanized equipment to complete the activities described above as well as future trail maintenance which would help ensure a sustainable trail system.

The addition of this access point can only occur through partnership with the National Park Service. In its current form, all parking for the greater Graveyard Fields area takes place in a single parking lot managed by the Blue Ridge Parkway unit of the National Park Service with overflow (both legal and illegal) on both sides of the Parkway in either direction. This overflow parking is unsafe for those traveling in passing vehicles; unsafe for visitors walking on the Parkway to access the trail network; and problematic for managing the roadway surface itself. This proposal, in collaboration with the National Park Service, would use the existing John Rock Overlook on the Parkway as an additional access point for Graveyard Fields. The associated pedestrian crossing on the Parkway would be clearly established and planned with crossing safety as a priority, ultimately connecting the overlook to a new trail constructed on National Park Service (NPS) land and leading to National Forest System (NFS) land. Trail construction on both NPS and NFS lands would involve a small amount of vegetation clearing. Graveyard Fields was historically managed independently by the agencies on either side of the property line, but the consequences of its high visitation are felt by both. In recent years, the collaborative management of this area between the agencies has increased. By creating an additional safe access via the overlook, use of the area can be better distributed and the safety of the visitor experience can be improved.

Stream Restoration

Some of the official trail system at Graveyard Fields is either directly adjacent to the Yellowstone Prong or one of its tributaries. Significant precipitation and high use of damaged trails serves to increase the movement of sediment. Some of this sediment can enter adjacent streams, potentially impacting the quality those habitats. Beyond the impacts of the official trail system, the streams in this area (like many other areas on the Pisgah) draw visitors overland whether there's an official trail or not. This repeated and high-volume foot traffic has led to the creation of multiple access points that look like trails on the ground but are often not sustainable for various reasons. These user-created paths and river access points create a source of sediment that can directly enter the stream and impact the health of the aquatic ecosystem. Additionally, these access points have resulted in reduced streambank vegetation, which normally help stabilize the streambank and provide shade, which serves to reduce water temperatures and maintain stable habitats within the aquatic ecosystem. Stream restoration work would stabilize both trails and stream access points through use of boulders, altered slopes, plantings and similar means.

Red Spruce Restoration

Beyond the trails and stream, the landscape also contains critical wildlife habitat that threatened and endangered species rely on. Red Spruce is a critical part of this habitat but its current distribution, vigor and structure is in need of restoration. After large scale logging and subsequent fires in this area about 80 years ago, red spruce plantations were planted to restore the species. These stands were planted with very close spacing but have not had follow-up treatments to keep them vigorous which threatens this critical habitat. These areas also have little diversity when it comes to age, structure and species which creates a less resilient forest. Red spruce occupies the overstory across a few hundred acres in this area but its overall presence is only a fraction of what it would have been over a hundred years ago. Endangered species such as the Carolina northern flying squirrel and the spruce-fir moss spider could benefit from the expansion of red spruce in this area.

Spruce Restoration work would seek to remedy these conditions through several types of treatments. First, some treatments would thin or release some existing red spruce plantations and planting to increase their vigor and allow increased diversity. Other treatments would seek to expand the presence of the red spruce in areas that would provide additional habitat connectivity.

Proposed Activities

(see the attached map also)

<u>Heavy Trail Maintenance – approximately 8 miles</u>

Trail maintenance accomplished with the use of handtools, mechanized equipment and additional material (stone, locusts, etc.). This would occur on the following trails: 356, 356A, 358, 358A, 358B and 146 (between NFSR 816 & Ivestor Gap).

<u>Trail Relocation/Decommissioning – approximately 0.75 miles</u>

Segments of trail that are not in a sustainable alignment would be decommissioned while new trail is constructed in a sustainable location in the following areas: 356A and 358A.

<u>Trail Construction – approximately 1.6 miles</u>

Trails constructed to a sustainable standard.

- Trail forming a loop that connects the current terminus of 358A at Upper Falls to 358 on the south side of the Yellowstone Prong (1 mile).
- Trail from the John Rock overlook on the Blue Ridge Parkway to the above referenced trail (0.2 miles). *This trail would be constructed on National Park Service Lands.*
- Trail connecting 358 to 358A via a native surfaced low water ford across Yellowstone Prong (0.2 miles). This ford would be used occasionally to transport mechanized equipment across the stream.
- Trail providing sustainable access to a popular area of Yellowstone Prong (0.2 miles).

Stream Restoration & Streambank Stabilization – approximately 8 locations

Placement of boulders, sloping streambanks, constructing vane structures, riparian plantings and various other methods would be used to armor the streambank and restore the stream itself.

<u>Spruce Restoration – approximately 100 acres</u>

This restoration would be accomplished by the methods below.

- Implement a stand improvement treatment on a plantation that is approximately 80 years old by manual/mechanical girdling (50 acres).
- Release young red spruce seedlings that are less than 5 years old (5 acres).
- Underplant and subsequently release red spruce seedlings (45 acres).

Public Involvement

We welcome your input on this proposed action and to identify potential issues (36 CFR 220). If you have questions about this project please contact Jeff Owenby at 828-877-3265, ext. 216 or by email at jeffrey.owenby@usda.gov.

A preliminary assessment of the current proposal and potential future actions indicates there are no extraordinary circumstances and thus no significant effects for this proposal. Therefore, the proposal may qualify under the following categorical exclusions: Repair and maintenance of roads, trails, and landline boundaries, 36 CFR 220.6(d)(4); Construction and reconstruction of trails, 36 CFR 220.6(e)(1); Regeneration of an area to native tree species including site preparation that does not involve the use of herbicides or result in vegetation type conversion, 36 CFR 220.6(e)(5); Timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than 1 miles of low standard road construction, 36 CFR 220.6(e)(6); Modification or maintenance of stream or lake aquatic habitat improvement structures using native materials or normal practices, 36 CFR 220.6(e)(7); Restoring wetlands, streams, riparian areas or other water bodies by removing, replacing, or modifying water control structures such as, but not limited to, dams, levees, dikes, ditches, culverts, pipes, drainage tiles, valves, gates, and fencing, to allow waters to flow into natural channels and floodplains and restore natural flow regimes to the extent practicable where valid existing rights or special use authorizations are not unilaterally altered or canceled, 36 CFR 220.6(e)(18). If this project remains under a categorical exclusion after further assessment, it will not be subject to administrative review and appeal. Therefore, it is important that we receive your comments and interest pertaining to this project early. To be most useful, please submit comments within the official 30-day scoping period starting on November 20, 2020 and open through December 20, 2020.

The preferred method to provide comments is by submitting them electronically at: <u>https://www.fs.usda.gov/project/?project=55665</u>. On the right side of this webpage, click on "Comment/Object on Project" and submit your comments. Please do not submit electronic comments by email. Additionally, comments may be mailed to: Pisgah Ranger District, USDA Forest Service, Attn: Jeff Owenby, 1600 Pisgah Highway, Pisgah Forest, NC 28768. Comments will become part of the project record and may be released under the Freedom of Information Act.

Sincerely,

DAVID M. CASEY District Ranger