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August 19, 2015

Katie Donahue
District Ranger
Lee Ranger District
95 Railroad Avenue
Edinburg, VA 22824

Comments-southern-georgewashington-jefferson-lee@fs.fed.us

Re: First Mountain Salvage and Habitat Improvement

Dear Ms. Donahue:

My first contact regarding the First Mountain Salvage Sale was by mail, postmarked June 11 and received June 15, 2012.

On June 23, I went to the GWNF website to get more information on the project but the link on the website was non-functional.

I called the supervisor's office that day and was advised that the link was, indeed, broken and had not ever been functional. I asked if it was possible to extend the scoping period since there was no public information available for the first 10 days of the scoping period. I also requested information by mail that I have still not received.

I left a phone message to that effect to you at the Lee district. I have not yet received a return call regarding that request.

The link is now functional. I was able to get the information on it on June 24th.

David Sligh, Wild Virginia's Conservation Director left a follow-up message on July 6.

On July 8, David and I spoke with Kevin Kyle who informed us that "we are going to take another look at the project." Kevin also told David that the Forest Service had decided to conduct an EA on the project, rather than proceed under the categorical exclusion. David also spoke to Kevin by phone on July 28 and was told the same thing.

I subsequently did a site visit to the project area on July 23. I explored units 1, 2, 3, 4, 7, 8, 9 and 10.

I found the salvage units 7, 8, 9 and 10 have very little commercial value, and very little marketable timber. Using a densitometer, we found very little canopy cover in these areas, creating an area of pure early-successional habitat, at about 3 years old since the fire. (see attached fig. #1, 2)

It is ironic that the habitat created by the Shipwreck Wildfire in 2012 had created forest conditions (ESH with little canopy cover) similar to those which this project seeks to create on the remainder of the project. It was significant enough for me to question the purpose and need for this project.

Units 1, 2, 3 and 4 contained forests of about 120 years with a large component of chestnut, eastern red and white oak and a forest where canopy gaps were already common due to irregular and random mortality. Densitometer readings averaged about 78-80% from a random sampling throughout. (see attached fig. #3, 4)

My conclusion was that probably more than 90% of the timber removed from the project would have to be done in the forest-stand improvement units, despite the relatively similar acreage between salvage and cutting units.

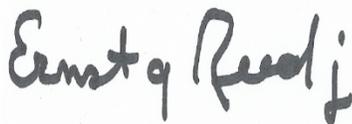
Also while I did note some ailanthus along Cub Run Road, I found none in any of the project area stands I visited. Those individuals I found along Cub Run Road were small enough to be hand up-rooted which is what I did with the 8 seedlings I saw. It would not seem to be the problem at this time that the scoping notice asserted but I certainly see this as a greater future problem should this project move forward.

There is no information in the scoping notice as to the rationale for having this project categorically excluded from NEPA requirements under 36 CFR 218.23(a) as environmental impacts from forest stand improvement areas and almost 2 miles of temporary roads pose significant environmental impacts.

My question is “Has the First Mountain Salvage Sale, in fact, been dropped for the time being or the time line modified or is it continuing to move forward as proposed in the June 11 notice?” The Service’s website has yet to be updated to reflect any such change.

I request and hope that that this project is to be re-scoped and fully analyzed as a Habitat Improvement Project under NEPA with an EA analyzing the environmental impacts created through implementation of this project as Kevin Kyle has indicated is to be the case. Please clarify the Service’s intentions for the public’s information and update the website to reflect the current plans for this project.

Sincerely,

A handwritten signature in black ink that reads "Ernie Reed". The signature is written in a cursive, slightly slanted style.

Ernie Reed, President
Wild Virginia
P. O. Box 1065
Charlottesville, VA 22902