

Lee Ranger District
Moreland Gap Thinning Scoping Comments
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Please accept the following comments on behalf of Wild Virginia on the Moreland Gap Thinning Project Scoping Notice. I attended the public meeting at the Lee Ranger District Office on April 6, 2016.

At that time I raised some, but not all of the following issues.

1. Lack of sufficient information in the Scoping Notice with respect to roads included in the project

The USFS is required to include sufficient information in the scoping notice to allow for informed and educated comments by the public. The scoping notice dated March 2, 2016 states that “approximately one mile of constructed temporary road would be needed to access variable thinning units.” It also mentions the need for landings to be constructed.

There is no information included as to the location or the number of road segments that will be required for this project. The locations of the temporary roads are also not listed on the map of the project area.

The impacts of these roads are some of the most significant impacts connected with this project. Despite the fact that these roads are defined as “temporary”, the effects of them are identical to that of any road of a more permanent nature over the course of the project. It is impossible to consider the potential environmental impacts of this road building and use without the knowledge of where these roads (and landings) are being proposed. Without this information, how is the public able to assess potential environmental impacts?

2. Impacts of Roads

The impacts of road building include, but are not limited to, accelerated erosion, soil compaction, fragmentation, and the introduction of invasive species into the project area. Roads have direct and significant effects on any crossed or nearby streams, whether perennial or ephemeral, through increased sediment loads. Rain events will accelerate and increase the impacts significantly.

When asked about the timeframe for this project and how many entries would be considered under this scoping notice, the answer was vague and lacked specificity. It was implied that this project could include additional entries and

burns after two years and again after 2-5 more. These roads would be in use at those times, even if they were gated in the interim. These roads, therefore, could have a “life” of up to 7 years or more. This brings into question their “temporary” nature.

It is also noteworthy that if these roads were at all considered more than “low standard” or new road construction, as they may very well be, then this project would not qualify under 36 CFR 218.23(a) as not subject to objection or under 36 CFR 220.6(e)(6) as categorically excluded from documentation.

3. Purpose and Need

We question the purpose and need for this project.

It is noted in the scoping notice that “this area experienced heavy gypsy moth mortality in the 1980’s and 1990’s, resulting in partial loss of the oak overstory.” Events like this, which may also include naturally (or human-caused) wildfires, windthrow, ice storms or other insect predation, create the very early-successional habitat conditions that this project also proposes to produce. Additionally, events like these, in a short amount of time, have created “a dense mid-story (trees 2 to 8” in diameter at breast height – DBH) of shade tolerant trees such as red maple. This dense layer makes the understory relatively ‘dark’, with very few herbaceous plants.” Therefore, this project will be replicating the very habitat it proposes to eliminate.

Furthermore, the statement: “Without management these trees will likely replace the oaks and pines currently in the over story” is misleading. Nowhere is there specified that oaks currently in the project area will be spared the chainsaw and left to remain. Clearly, if oaks are cut and removed, their dominance in the canopy will be reduced.

The project area will continue to have a significant oak component although the percentage in the overstory is likely to be reduced in the short term. However, seedlings and sprouts will continue to exist throughout the forest and when less desirable tree species with shorter life cycles decrease through time, the oak component in the canopy will continue to increase. Any future canopy gaps created through mortality, infestation, blowdown, ice storms, fires or any other disturbances, will result in a stronger and more vibrant oak component.

4. Invasives and illegal usage

This project, if implemented as proposed, will increase the intrusion, diversity, population, and range of nonnative invasive species throughout the project areas. The roads will act as the primary vector, but all resulting bare and denuded soil, landings, skid trails, and any other mechanized transport throughout the

project will further impact the area. Repeated fire merely recreates the opportunity for increased invasives.

In addition, illegal ORV/ATV use in this area of the forest is well documented by the other people living nearby who were also at the April 6 meeting. These roads and trails will create opportunities for illegal use that will only further increase the impacts of those roads (previously mentioned) and the proliferation of invasives.

Climate

There was no mention, in the scoping notice or at the meeting, of the effects that this project could have on climate. Climate is a product of the forest. The logging, thinning, and removing of dead and downed trees for firewood will create a forest that will store less carbon and will continue to do so for the entire duration of the project.

Climate is influenced by changes in land cover. Even though forests in the U.S. have acted as net carbon sinks since the 1950s, the annual additions to the sink (sequestration) appear to be declining. The Environmental Protection Agency lists the following forestry practices that can sequester carbon or preserve carbon storage: afforestation, reforestation, avoiding logging, and longer harvest-regeneration cycles (Ravin and Raine. 2007).

Obviously, planned logging, burning, and taking out vegetation for other reasons does not increase the capacity of forests a carbon sinks. In fact, "young forests rather than old-growth forests are very often conspicuous sources of CO₂ because the creation of new forests (whether naturally or by humans) frequently follows disturbance to soil and the previous vegetation, resulting in a decomposition rate of coarse woody debris, litter and soil organic matter that exceeds the NPP (net primary production) of the regrowth" (Luyssaert et al. 2008).

Land surface changes can impact local precipitation and temperatures. Because forests affect climate and weather by lowering temperatures, increasing the moisture content of air and soil, absorbing carbon dioxide from the atmosphere and sequestering carbon, each part of the forest contributes to climate control, the logging, thinning, and burning in this project will affect climate directly.

For these reasons Wild Virginia requests that:

1. The scoping period be reinitiated and that the specific information on the location of potential roads and landings and potential impacts on climate be included in the notice.
2. The deciding officer consider a range of alternatives for this project that would include both a no action alternative and one in which there are no temporary roads proposed for the project area.

3. Given the nature of the project and the long time frame for re-entry on the new roads, this project be considered “significant” and that a full NEPA analysis be undertaken including the possibility of future objection rights for the public.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Ernest Reed". The signature is written in a cursive style with a small flourish at the end.

Ernie Reed, President
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References:

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