

June 13, 2014

Karen Stevens
Pat Sheridan, District Ranger
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re: Lower Cowpasture Restoration Project

Dear Ms. Stevens and Ranger Sheridan,

Please accept these additional comments on the Lower Cowpasture Restoration Project on behalf of Wild Virginia and Heartwood. We reiterate our comments of February 6, 2014 and wish to add these additional to the project record.

Eastern Brook Trout

Wild Virginia and Heartwood first raised this issue at the May 19, 2014 public meeting.

Wilson Creek, Smith Creek and Simpson Creek are listed by the Virginia Department of Game and Inland Fisheries as Wild Trout Waters. Each of these wild trout streams are in the project area fisheries stand to be significantly degraded by proposed actions.

Many of the Lime Kiln and Sandy Springs harvest units occur in the Wilson Creek watershed. Up to 7 miles of temporary road construction are proposed. Numerous TSI areas are proposed in the Wilson Creek Watershed as well.

Numerous Sandy Springs harvest units and TSI areas line the western Smith Creek watershed. TSI units also occur on the relatively steep east side.

The Craft Road Harvest units and at least one TSI area all occur in the Simpson Creek Watershed.

It is difficult to fathom why these are proposed as part of a "restoration" project when all have the potential to negatively impact native trout populations.

The resulting sediment load to the streams and the rise in water temperatures as a result of timber activity, road building, canopy removal and removal of down woody debris will combine to negatively impact native trout populations.

Wild Virginia recommends that these actions be cancelled and that these areas be designated as management exclusion zones for the restoration of Eastern Brook Trout.

Conserving the Eastern Brook Trout: Action Strategies, prepared by the Conservation Strategy/Habitat Work Group, Eastern Brook Trout Joint Venture, January 2011 notes that

*Brook trout *Salvelinus fontinalis* are a recreationally and culturally important species, regional icon, and indicator of high water quality. Biologists have long known that brook trout populations are declining across their historic eastern United States range, which spans from Maine to Georgia. For purposes of this document, a population of brook trout is defined as a group of individuals that are reproductively isolated from other groups. In recognition of this trend of long-term decline and continued vulnerability, representatives from over 50 state and federal fish and wildlife management agencies, nongovernmental organizations, and academic institutions met in June 2004 to discuss the opportunity for a collaborative approach to the conservation of brook trout in the eastern United States. In addition to identifying threats to brook trout across their historic range, it was the group's consensus there was an opportunity to form an Eastern Brook Trout Joint Venture (EBTJV). A collaborative approach to brook trout management is justified because (1) brook trout are declining across their entire eastern range; (2) causes for these declines are similar; (3) an integrated approach would be cost effective; and, (4) watersheds of concern span state borders and state and federal jurisdictions.*

Goals and strategies of the EBTJV include

- *Work closely with state and federal permitting agencies to avoid or minimize potential impact to brook trout habitat or water quality.*
- *Develop a comprehensive management plan to protect the genetic integrity of remaining southern Appalachian brook trout populations and restore populations where appropriate.*
- *Develop a list of potential projects based on brook trout distribution data, land ownership, likelihood for success and angler access.*
- *Use the state's restoration biologists to develop natural stream designs for habitat restoration projects.*
- *Use historic brook trout distribution information, current land use data, water quality data and location of spring sources to develop a list of streams that could be restored with a high potential likelihood for success.*
- *Maximize fishing opportunity through regulation:*

- *Monitor populations to determine if angling pressure is adversely impacting brook trout populations*
- *Insure optimum populations of brook trout are available for anglers through the appropriate use of size, creel and gear restrictions.*
- *Conduct periodic creel surveys on selected brook trout waters to determine angler use, harvest, and preferences.*

We fail to see any reason why the Lower Cowpasture Restoration Project should not present an important opportunity to implement these goals and strategies. There are ecological and recreational opportunities for the Lower Cowpasture Watershed that are not being considered. They should be.

At the very least, management activities should be prioritized that benefit native brook trout populations and those that hamper, hinder or negatively impact existing populations should be removed from consideration.

Increasing the population of eastern brook trout, restoring them to areas within their historical range and actively monitoring their populations and range should be goals of the Lower Cowpasture Restoration Project.

Fire Exclusion Zones

Wild Virginia and Heartwood wish to reiterate our opposition to the large-scale and seriously flawed approach to prescribed burning promoted by the Fire Learning Network and Nature Conservancy that has been adopted as a major component of the Lower Cowpasture Restoration Project.

Recent reports (*Using Physical Chemistry And Tree Rings To Calculate The Likelihood Of Fire*, Richard Guyette, Frank Thompson, Jodi Whittier, Michael Stambaugh, Daniel Dey, Rose-Marie Muzika, University of Missouri, Columbia, USA, Northern Research Station US Forest Service, Columbia, USA, 2006; and others previously mentioned) bring into question many of the assumptions upon which the Fire Learning Network model is based.

We suggest that natural disturbance mapping and monitoring be a vital part of the Lower Cowpasture Restoration Project. The percentage of existing canopy gaps and existing ESH should be mapped throughout the project area *and* on a landscape area to determine the existing % of ESH and unforested/canopy gap area in the project area and on a landscape area. This should be required baseline information in determining any purpose and need for vegetation management to create ESH. Information should be monitored quarterly to account for “real time” natural canopy gap creation in the project area.

We are unaware of any monitoring that has been done in the project area that demonstrates that goals and objectives can or cannot be met through natural processes. We re unaware of any monitoring that confirms that the goals and

objectives of the prescribed burn program are likely to be achieved. At the very least, monitoring should be ongoing in order to generate this information critical to understanding the role of natural processes in the project area.

We request that the majority of the area proposed for prescribed burning be removed from the proposal. We further request that significant “fire exclusion zones” of similar/identical forest types within the burn units be preserved and not burned. Joint monitoring of these adjacent areas as mentioned above can provide important information for future management of the forest by determining if the desired results are achieved.

Hemlock Restoration Areas

With the passage of the 2014 Farm Bill and based on recent requests by Virginia’s Governor and confirmation by the USFS, the entire GWNF has been identified as a qualifying area due to wooly adelgid infestation. The Farm Bill authorizes the USFS

to carry out forest restoration treatments that--

‘(A) maximizes the retention of old-growth and large trees, as appropriate for the forest type, to the extent that the trees promote stands that are resilient to insects and disease;

‘(B) considers the best available scientific information to maintain or restore the ecological integrity, including maintaining or restoring structure, function, composition, and connectivity;(sec. 603).

Wild Virginia and Heartwood request that project planners inventory the project area and identify areas that contain the most significant existing live hemlock populations. We further suggest that these identified areas be identified as Hemlock Restoration Areas under Sec. 603 of the 2014 Farm Bill and that individual trees be selected based on relative health, age, and population density for targeted chemical treatment to prevent their decline from the impacts of the wooly adelgid. The purpose and need would be to maintain the genetic heritage and genepool of eastern hemlocks in these areas. These areas should be monitored regularly and treated a necessary with the goal of increasing the population density of eastern hemlock in the areas.

Climate Reserves

Heartwood and Wild Virginia also request that an alternative for the Lower Cowpasture Restoration Project area be that the project area be considered for designation as a Climate Reserve Area. Carbon storage analysis should be done for the entire project area and the loss of carbon storage capacity and rate of carbon storage should be estimated under this and all alternatives. Analysis should also contain analysis of how designating the project area a Climate Reserve dominated by natural process would serve to achieve the purpose and need of the project. This

should include, but not be limited to, the economic benefits of all ecosystem services provided by such an alternative.

Thank you for the opportunity to submit additional comments on the Lower Cowpasture Restoration Project.

Sincerely,

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