



May 31, 2016

P.O. Box 1065
Charlottesville, VA
22902
(434) 971-1553
www.wildvirginia.org

Elizabeth McNichols
District Ranger
James River Ranger District
emcnichols@fs.fed.us

Sent Via Email

Karen Overcash
George Washington and Jefferson National Forests
kovercash@fs.fed.us

Board of Directors:

Re: Big Run Road Decommissioning Project Proposal, Allegheny County, James River Ranger District

Devon Callan

Ms. McNichols and Ms. Overcash:

Bette Dzamba

These comments are submitted on behalf of Wild Virginia. The referenced project is described as a proposal to decommission approximately 2.7 miles of Big Run Road (National Forest System Road 600). We strongly support the elimination of this road and the efforts described to restore proper drainage patterns and stream conditions. We note that the listing for this project on the George Washington National Forest (GWNF) web site currently includes no documents for this project, though copies of an announcement were mailed. This absence of information on the web site will prevent parties who may depend on the web site as their sole form of notice on projects.

Howard Evergreen

Jennifer Lewis

Laurie Miller

Ernie Reed

David Sellers

Deirdre Skogen

We agree with the notice statements that this action will support the goals of the Land and Resource Management Plan (Forest Plan) for the George Washington National Forest (GWNF). It is widely acknowledged by the U.S. Forest Service (USFS) and many other authorities that forest roads have serious detrimental impacts on water quality and hydrologic conditions in forests. Also, existing roads provide opportunities for the establishment and dominance of non-native invasive species and existing roads, whether active or inactive are attractants for illegal uses by off-road vehicles. This proposal should provide substantial benefits to the Forest by addressing each of these impacts, if the decommissioning follows certain practices.

To achieve the greatest improvements in the area affected by the road addressed here, we believe it is important to take several specific steps, as described below:

1. Rather than seeding the abandoned road with grass, it is important that native forest species be established. Establishing grass cover, while reducing the impacts of storm runoff and erosion to some extent, will not be as effective as will efforts to restore trees and appropriate herbaceous plants as quickly and effectively as possible. Grass cover will not deter the use of the road by vehicles and off-road vehicle users will bypass structures designed to deny access to cars and trucks. Also, the grassed areas will still be prime environments for continued existence and invasion of non-native plants. The USFS should devise a plan to establish native tree species that can provide a more effective deterrent to illegal uses and which can out-compete the non-native plants.

2. All possible efforts must be made, during the decommissioning process, to eradicate existing invasive species. Methods for doing so should be described in the public notice so that the public can comment on them.

3. Finally, the economic costs and benefits of this project should be assessed. We assert that, while the initial work involved in decommissioning the road will involve some costs, that this action will save Forest Service resources in the future by eliminating the need for future management of the area, once native plant communities are established. Such an accounting is important to show the overall benefits of this project and can inform other decommissioning proposals on the GWNF.

Thank you for the chance to comment on this proposal and for taking the initiative to improve the forest.

Sincerely,

David Sligh
Conservation Director