



February 6, 2017

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Dan McKeague
District Ranger
Eastern Divide Ranger District
Jefferson National Forest
easterndivide@fs.fed.us

Sent Via Email

Re: Caseknife Commercial Thinning Project Scoping Comments

Dear Ranger McKeague:

Board of Directors:

Bette Dzamba

Howard Evergreen

Jennifer Lewis

Laurie Miller

Ernie Reed

David Sellers

Deirdre Skogen

Elizabeth Williams

I am submitting these comments in response to the scoping notice (“Notice”) for the referenced project, on behalf of Wild Virginia. We have several concerns with the sufficiency of the Notice to allow the public to make useful comments on the proposal, as explained below:

1. The Notice indicates that this project may be covered by a categorical exclusion, however no discussion about possible bases for an exclusion is included. As you know, there are a variety of provisions, both legislatively- and administratively-created, that can justify such an exemption from further processing and review under the National Environmental Policy Act (NEPA). If the Forest Service believes this project may fall within one or more of the excluded categories, the public has a right to know which one(s) and to have some information about the factors that will be considered in making this decision.
2. The listing for this project on the Forest Service web site mentions that “[p]ost-harvest activities” are to “include monitoring and treatment for NNIS.” These activities are not discussed in the Notice. Given that such activities may be vital to success in meeting some of the goals and objectives by which the project is to be measured, the Notice should include at least some mention of the possible methods that could be used in these efforts.
3. Because the presence or absence of “extraordinary circumstances” are part of the assessment of eligibility for categorical exclusion, the Notice should at the least mention what some of those factors are. One possible extraordinary circumstance, as listed in Handbook at section 31.2, is the presence of “municipal watersheds.” The Notice lists one prescription for the proposed project area as 9A1 - Source Water Protection Watersheds. The discussion in the Notice indicates that the alteration of tree stand components is intended to increase water quality protections. However, it must be acknowledged that some activities included in the proposal may also have negative impacts on water quality. The establishment of staging areas and temporary roads, the use and maintenance of the permanent road to be used, and other activities must be examined.

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4. The Notice provides a “baseline” description of current tree species composition and a description of desired future conditions. Such baseline descriptions should be provided for other factors that bear on compliance with the Forest Plan and other goals and objectives. For example, what is the present state of the roads in the area? Are there significant maintenance needs and to what extent will the activities described meet those needs? Are there existing contributions of pollutants to area water bodies from these roads, as is often the case with forest roads? Likewise, information about the current status of non-native invasive species in the prescription area should be provided, as well as some indication as to how the project would affect that status.

Thank you for the chance to comment on this project and for your consideration of the issues we have raised.

Sincerely,

/s/ David Sligh
David Sligh
Conservation Director

cc: Karen Overcash, GW&J NF