



January 6, 2017

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Lauren Stull
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Sent Via Email

Re: Pulaski Grouse Vegetation Project Scoping Comments

Dear Ms. Stull:

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 note that the Notice bears the date December 7, 2016 and was published on that same date on the George Washington and Jefferson National Forest (“GWJNF”) web site. We presume, though it is unstated on the Notice, that the 30-day comment period began on December 7, 2016 and will conclude on January 6, 2017. If we have missed the official deadline, then we object and insist that a new public notice is legally required to meet.

Our comments on this project are contained in the numbered sections below. We note that some of our concerns were expressed in relation to another project in a Ruffed Grouse prescription area. For that project, in the Tub Run management area, on the Eastern Divide Ranger District, Wild Virginia submitted extensive comments. The Forest Service (“FS”) issued a Draft Environmental Assessment (“DEA”) and Draft Decision Notice for the Tub Run proposal in December 2016. Because there are common issues and topics between Tub Run and this proposed project, we wish to incorporate Wild Virginia’s scoping comments, the FS responses to those comments, the DEA, and the Draft Decision Notice from that case, by reference, as part of these comments. We hereby reiterate any of our comments from the Tub Run project that specifically apply to activities relevant to ruffed grouse habitat management.

1. The possible visual impacts of this proposal, particularly on users of the Appalachian Trail (“AT”), FS trails, and the Blue Ridge Parkway must be assessed. It appears that one or more of these linear resources lies upgradient from and/or within the viewshed of one or more tracts for which management is proposed. However, in the short time available, we have been unable to investigate this matter fully.

In relation to visual impacts, we note that the GWJNF is currently considering applications for two special use permits for major natural gas infrastructure projects, both of which would have substantial and very damaging impacts on the visual quality of the AT. Any possible impacts from this project must be considered in a cumulative impacts analysis with those major projects and other factors that may impact the AT’s visual surroundings, both on and off the Forest. While the visual impacts from a project such as this one will certainly be minor in comparison to the major proposals cited above and in the context of the AT throughout Virginia and beyond, that fact does not obviate the need to do the cumulative impacts analysis. In fact, the reality, that a

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number of smaller impacts may have, in aggregate, a very substantial overall impact on our resources is the reason cumulative impacts analyses are so important and required under the National Environmental Policy Act (“NEPA”).

2. The DEA for this project must describe the proximity of this project to any Roadless Areas and Special Biological Areas and any potential impacts on those management areas.

3. An important aspect of the planning for this project under NEPA relates to the resources the FS has and would in the future be required to devote to this area, if the proposal is approved, versus any income that may be derived from timber sales. Such an accounting must be done to properly explain the FS’s ability to carry out the administrative and substantive tasks that must be completed to ensure that this project fully meets resource protection requirements. Questions that should be answered include:

- how much FS staff or contractor time has already been devoted to this proposal and how much is projected to be needed through the life of this project (this must include actions directly implementing the project and those that may be needed to mitigate impacts in the future - such as increased occurrence of invasive species, retirement of temporary roads, restoration to pre-project conditions, etc.;
- what is the financial value of that personnel time;
- what other costs will the FS likely incur, in equipment purchases or rentals, or otherwise;
- what income is the FS predicted to derive from timber sales;
- what is the net impact on FS resources from this project; and finally
- how do resources devoted to this project or income derived from it prevent or enable the FS to pursue other objectives on the Forest?

4. We note that the “need” cited for this project is to move towards conformance with certain portions of the Land and Resource Management Plan (“Forest Plan”) for the Jefferson National Forest. The Notice cites “Goals” 12 and 15 from the Forest Plan as ones that may be served by this project. Of course, the FS is obligated to attempt to reach all the “goals” from the Forest Plan, through pursuit of the Objectives and management prescriptions also included in the Plan.

Given that conformance with some other Goals from the Forest Plan is or may require as much or more effort by the FS if they are to be met Forest-wide, these other Goals must be discussed in the EA. For example, Goal 6 from the Forest Plan is to “[m]aintain and restore natural communities in amounts, arrangements, and conditions capable of supporting native and desired non-native species within the planning area.” It is well known that non-native invasive species are a significant and growing problem across the Forest and that disturbance of forest habitats, through timbering operations and road-building, can and do promote the spread and establishment of invasive species. The very actions here proposed to serve goals 12 and 15, thus, may make goal 6 harder to reach.

Also, any devotion of FS resources to one type of project may reduce the FS’s ability to work on other goals, because staff time and money are severely and increasingly limited. This reality is why the kind of analysis discussed in item 3 above is so important.

Analysis of the relation of this proposal to other Goals in the Forest Plan must include, but are not limited to, Goals 20 (recreation), 25 (scenic and aesthetic values), 32 and 33 (roads maintenance and decommissioning).

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5. The Notice states that “[b]ased on the scope of the proposed action, I anticipate the environmental assessment to disclose the impacts on the following resources” and lists seven categories of resources. The Forest’s value for carbon sequestration is a resource and the consequences of the project on this resource must be examined in the EA. Further, the quality of all resources on the Forest may be affected by climate changes and the associated environmental factors and, so, the EA must discuss whether the actions taken will increase or decrease the Forest’s value for buffering the consequences of climate change. This analysis is necessary to conform to the legal requirements of NEPA”), implementing regulations, and guidance from the Council on Environmental Quality (“CEQ”).

6. As cited in the Notice, this project is proposed in part to satisfy Goal 15 from the Forest Plan, which calls for actions that “[p]rovide a stable supply of wood products for local needs where forest management activities are needed and appropriate to achieve the desired composition, structure, function, productivity, and sustainability of forest ecosystems.” Thus, the supply of timber from this project may not be the primary impetus for the proposal. The EA must explain the state of markets for this timber, how the demands for the wood affected the development of this proposal, and whether and how these sales will meet “local needs.” Would this action be proposed even if timber sales and demands from harvesters were not present?

7. The EA should discuss whether there are any trails in the project area that are in need of repair and explore whether such improvements may be included as part of the project. We have been informed by GWJNF personnel that there is a large and “ever-growing” backlog of trail maintenance needs on the Forest and that many miles of trails are in less than optimal or even acceptable conditions. We assert that planning for every project proposed must seek to address this backlog.

8. The EA must include a discussion of possible road closures that could or should be accomplished through this project and must include an alternative that meets Objective 4 under prescription 8E1. As the Notice explains, the objective is to “maintain an open road density at or below 1.5 miles per square mile” but there are 3.4 miles per square mile now. The discussion in the Notice seems to treat this Objective differently from the other 3 Objectives that apply to the Ruffed Grouse area prescription. The discussion of the degree of conformance with this objective looks also at sections of the Forest outside this prescription area and assesses Objective 4 in that context. However, in discussing the other 3 Objectives, the focus in the Notice discussion seems to focus exclusively on the “project analysis area.” The EA should include an explanation as to the proper spatial focus by which the FS examines its efforts and success at meeting Forest Plan Goals, Objectives, and prescriptions.

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