



WILD VIRGINIA

Protecting your favorite wild places

P.O. Box 1065 Charlottesville, Virginia 22902 434.971.1553 www.wildvirginia.org

October 5, 2007

Mr. Mark Healey, Project Contact Person
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Re: Scoping Notice - Proposed Marshall Run Timber Sale

Mr. Mark Healey:

Please accept the following comments on the scoping notice for this proposed project. I am commenting on behalf of Wild Virginia and all the individual members of Wild Virginia's Board of Directors. All names and contact information are found at the end of these comments.

First and foremost, more time is needed in order for the public to adequately review and submit comments on a project of this size and scope. Thirty days is not a sufficient amount of time. Further, the lack of detail in the scoping notice prevents substantive review and comment on the part of the public.

A detailed analysis of environmental impacts and alternatives to the proposed timber sale and prescribed burn are needed. A draft Environmental Assessment should be available for public review and comment before any decisions about the project are made.

Representatives of Wild Virginia have visited the site. A major concern is that the entire project area falls within an approximately 17,000 acre uninventoried roadless area. Rather than creating new roads in order to harvest timber, the entire area should be kept intact so that it can be added to the roadless area inventory and evaluated for permanent protection. Given the backlog of road maintenance needs, the Forest Service should not build any new roads unless it can document its ability to properly maintain them.

The entire project area lies within Beech Lick Knob, a Virginia Mountain Treasure area. The book "*Virginia Mountain Treasures: The Unprotected Wildlands of the George Washington National Forest*" is to be published in the very near future. Forest Service personnel at GWJNF Headquarters in Roanoke have a draft edition of the book, including maps. The Beech Lick Knob area should be inventoried as roadless both in this project analysis and as part of the George Washington National Forest Plan revision. The amount of disturbance from new roads, temporary roads, skid trails, log decks, helicopter pads, fire lines, and all the human and heavy equipment activity necessary for this project are inappropriate for this site.

The harvest of mature trees and the disturbance associated with this project will increase surface water runoff. Sedimentation in Root Run, Marshall Run, and some intermittent streams will occur. These



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impacts are not addressed in the scoping notice. Given the flooding that has occurred in the recent past (1996), the potential for flooding and severe sedimentation from this project must be assessed.

The invasive species Japanese stilt grass (*Microstegium vimineum*) occurs in the project area. It has been observed in cutting unit 9 and in other sites within the project area. Tree-of-heaven (*Ailanthus altissima*) is also present in the project area, and other invasive species may occur as well. Open, disturbed areas such as those created by new roads, road improvements, log decks, skid trails, and fire breaks often serve as avenues for the spread of invasive species. A plan for preventing the spread of invasive species should be developed before any cutting or burning occurs.

Helicopter logging is proposed for cutting units 1, 2 and 4. This harvest method is uncommon in Virginia and the cost is very high. The Forest Service should document how the logging operation will have a positive economic effect on local communities, as the scoping notice implies.

All forest stands in the project are more than 90 years in age, with two units 120 years or older. Though these do not meet the Forest Service definition of old growth forest based on age, the old growth surveys of the project area deserve scrutiny. There is potential for creating future areas of old growth. The region surrounding the project area should be analyzed, and surveyed if necessary, to determine the amount of existing old growth forest. If old growth forest is rare or non-existent in the area, then sites within the project area should be considered for the creation of old growth.

Caves, limestone, and karst topography are known to occur in the general region of the project area. The Forest Service should determine the presence or absence of these features in the project area. If present, the potential effects of the project on these resources should be assessed.

There is insufficient description of and justification for the proposed prescribed burn of 1,300 acres. The scoping notice justifies the burn in order to “imitate the natural fire regime.” This is a goal that Wild Virginia can agree with in concept, as fire certainly plays an important ecological role in many types of forests. Implementation of the burn is problematic though. There is no consensus in the scientific community on the natural fire regime in the southern Appalachians. Experts disagree on the role of Native Americans in the fire history, and how much (if any) to include their impact in the “natural” fire regime. The role of European settlers has sometimes been referenced to describe historical fire regimes and thus justify prescribed burns. Further, the fire history of the project area is not described in the scoping notice. Without knowledge of the fire history at the site, no one can determine if the natural fire regime is being imitated.

The scoping notice states the desire to “improve biological diversity of the area by creating a mosaic of plant and animal communities” and “enhance the habitat of rare, fire-influenced species.” However, none of the species or communities is named, thus making the need for a prescribed burn impossible to assess. The target species and communities need to be listed and the positive effects of the proposed burn



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discussed. The objectives of a prescribed burn should be very specific and measurable. Without measurable objectives, the success of the burn cannot be determined.

There is no discussion of the tremendous variety of topography and physical features within the project area. Perhaps the intended result of a “mosaic of plant and animal communities” refers to the on-site diversity. However, thorough discussion and analysis is needed. While fire may not be uncommon along dry ridges and south-facing slopes, it is probably rare in other areas found in the project area, such as north-facing slopes, moist hollows, and some riparian corridors. More detailed information about site-specific desired results and how the burn is to be conducted is needed.

Another objective of the prescribed burn is to “reduce the risk of wildfire at the urban interface.” However, no information about the current fuel load or other potential risks is given. The project area is in a rural, remote area of Rockingham County. The only residential area in the vicinity is the small number of homes in Yankeetown. This is inadequate justification for a prescribed burn on the basis of public safety.

Finally in regards to the prescribed burn, the potential adverse effects from burning should be addressed. These effects may include (but are not limited to) increased air and particulate pollution, reduced carbon storage, increased soil pH, increased temperature, loss of soil nutrients, increased sediment loads, increased water temperature and pH, reduced populations of non-target species, and increases in invasive species. The physical ground disturbance caused by creating a very lengthy fire line merits discussion. These potential negative impacts must be weighed carefully to determine if the benefits from the burn would outweigh the adverse effects

Thank you for consideration of our comments. Please contact me if you have questions, need clarification, or wish to discuss any of the points that were raised.

Sincerely,

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