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March 10, 2009

Elwood Burge District Ranger
North River Ranger District
Big Run Revised EA #2 Comments
401 Oakwood Drive
Harrisonburg, VA 22801

Board of Directors:

comments-southern-georgewashington-jefferson-northriver@fs.fed.us

Chris Bowlen

Re: Revised Environmental Assessment
Big Run Project, Revision #2

Jennifer Creasy

Eric Gilchrist

Dear Ranger Burge,

Jason Halbert

Please accept the following comments on behalf of

Cynthia Hurst

Wild Virginia
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Jennifer Johnson

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Sierra Club – Virginia Chapter
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and

Shenandoah Group of the Virginia Chapter of the Sierra Club
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on the Revised EA for the Big Run Project, dated February 4, 2009.

We are concentrating our comments on the portion of the project that lies west of FDR 101/Tilghman Road and within the Little River Potential Wilderness Area (PWA).

Planning documents (for revising the Land and Resource Management Plan for the GWNF) state that the intention is that “these areas retain a natural evolving landscape character shaped primarily by natural processes. These landscapes feature a structurally diverse older aged forest community with occasional gaps created by disturbance events such as storms, insects, diseases, landslides, or fire. Rare communities and associated species not dependent upon managed disturbance will continue to exist.”

“Nonnative vegetation occurs only as transients and is not self-perpetuating. Cavity trees, cull trees, standing dead trees, and down logs are common throughout the area as a result of natural mortality. Terrestrial and aquatic communities exist within their natural range of variability.”

“Opportunities are provided for semi-primitive, non-motorized dispersed recreation experiences that emphasize solitude and challenge. Visitors are isolated from the sights and sounds of others and encounters with other visitors are rare. There is little evidence of visitor use and there is low interaction among users. Visitors on foot or horseback rely on their own personal physical abilities and primitive recreation skills, accepting the inherent risks associated with adverse weather conditions, isolation, natural physical hazards, and primitive travel and communications. Visitors are physically challenged as they ford streams and climb over downed trees.”

“Travel within wilderness is strictly non-motorized. Human travel is principally on system trails. Minor evidence of primitive travelways exists. Wilderness trails lie lightly on the land, typically narrow footpaths or horse trails.”

Given this, our comments follow.

1. Impacts on Wilderness Suitability/ Effects Related to Evaluation Criteria
 - a. Visual Quality Disturbances

Your analysis states that “approximately 1,100 acres of the Big Run project area are within the boundary of the 30,227 acre Little River PWA”. These 1,100 acres represent 3.6% of the PWA. Per a document released by the Forest Service, dated January 2009 and entitled “Current Highlights for the New Forest Plan”, Little River is one of four PWAs that are likely to be recommended for wilderness consideration in the revised Forest Plan. At the 1/29/09 meeting in Lexington and 2/4/09 meeting in Woodstock – both public meetings to discuss revision of the Forest Plan for the GWNF – Ken Landgraf of the Forest Service indicated the Little River area to be recommended may be approximately 12,000 acres in size. If a recommendation is made for wilderness consideration of approximately 12,000 acres, these 1,100 acres become 9.2% of that area.

As the Revised EA states, of the 1,100 acres of the project area within the Little River PWA, “approximately 323 acres have been logged between 1957 and 1994.” The

cumulative impacts through time within the entire project area should be considered in your relevant evaluation criteria analysis. All impacts, regardless of when they occurred in the past or their possible future occurrence under this project, should be measured and evaluated. They should be measured and evaluated not only on the present 30,227 acre Little River PWA, but also the potential wilderness recommendation of 12,000 acres being used in the planning process.

Short term impacts are real impacts that are incompatible with wilderness values. The assumption that the “effect of logging can be expected to disappear through natural processes” and that roads “would recover naturally when closed” does not always hold true (please refer to photographs submitted as part of these comments) and is not applied forest wide. Using the assumption above, any closed roads, no matter how temporary or recently closed could be considered to be in the process of “recovering naturally” and their presence ignored for purposes of the wilderness planning analysis. Please note the attached photo of the eastern part of Sand Springs Trail (attachment #1). Any natural recovery of this road, eroded more than 3 vertical feet all the way to the bedrock, and proposed for “reconstruction” in this project, will not occur “when closed.” On the contrary, the road will likely continue to be an unnatural scar on the land for decades and perhaps much longer.

Given that the majority of the project activities will take place at the main entry point to the area, at the foot of Sand Springs Trail on Tilghman Road, visual damage will be significant. These disturbances will impact the numerous users of the area who might expect to experience an area which exhibits naturalness “substantially free from the effects of modern civilization and generally appears to have been affected primarily by forces of nature.” (attachment #2 and #3) The .75 mile of road reconstruction, associated landings, and past and proposed (alternative 2 or 3) impacts are clearly incompatible with the direction being proposed in the 2009 Forest Plan revision for this area.

Table 13 of the EA understates and under estimates the effects of this project since it does not account for the effects of past activities within the entire project area. Effects on Naturalness, Undeveloped, Special Features and Values and Nonconforming uses would seem to be much more significant than presented in the EA and would be so significant that it would no longer exhibit those “basic natural characteristics that make it suitable for wilderness.”

Logging these adjacent or marginal places will degrade the roadless/unroaded area’s special ecological, recreational, and scenic values; the roadless area will in effect be diminished in size as visitors will have to retreat further and further into the interior in order to escape "sights and sounds of civilization". This and other relevant impacts are not assessed by the planners. The combined effects of these and past actions are important and relevant.

b. Road Reconstruction

Temporary road construction in the project area is not in keeping with potential wilderness guidelines which state that “minor evidence of primitive travelways exists. Wilderness trails lie lightly on the land, typically narrow footpaths or horse trails.”

The first half mile of roadbed which comprises the bottom of Sand Springs Trail is already a significant scar on the face of an area which cannot be described as primitive. Although it is assumed that this area has not had any vehicular traffic for over 10 years, the roadbed is barely beginning to take on a more natural appearance. In fact, since the trail is on a consistently moderate-significant grade, erosion continues. Rain events must cause water to careen down the roadbed and further erode the roadbed, depositing large amounts of silt near the confluence of Big Run and Broad Run. Road reconstruction would set back the hands of restorative time by more than 10 years.

2. Timing and Effect on Revised 2009-10 Forest Plan

Were the project area to be part of the Little River PWA recommended for Wilderness Study/Potential Wilderness Recommendation, this project would undoubtedly be incompatible with such a designation. The EA states that the proposed logging activities are “a nonconforming use” and proposed temporary roads are “nonconforming structures.” Since it would be inappropriate for the wilderness values of Little River PWA to be compromised in the interim while the new plan is being formulated, no decision should be made on this project until the new Forest Plan has been finalized and adopted. Further, the portion of the project on the west side of FDR 101/Tilghman Road should be withdrawn.

3. White Pine Thinning and Wilderness Values as Justification for Project

The EA notes that the 185 acres of thinning “may improve or accelerate the development of a more natural looking forest,” using 30 years as the timeframe in which “all harvested units should appear natural and undisturbed.” White pine stands often undergo a natural thinning process. Desirable changes in species composition and forest structure are occurring, and can be expected to gradually continue over time. Natural processes could accomplish desired conditions without the “nonconforming use” and negative impacts associated with the proposed thinning operation.

4. Drinking Water Watershed Protection/Sedimentation and Erosion

The project area lies in the Big Run/Broad Run/North River Watershed which provides drinking water for the city of Harrisonburg and rural areas surrounding the city. The project has the potential of creating large amounts of erosion and therefore significantly increasing sediment in Big Run, Broad Run and the North River.

A site visit to the project area on 02/12/09 revealed 3-4 vertical feet of erosion along the temporary road at the foot of Sand Springs Trail. The banks continue to be extremely steep and unstable. The amount of water, erosion and sedimentation can be inferred directly from a view of the roadbed which, just above the gate at Tilghman road, is

eroded to the bedrock (attachment #1). Any road work or use will further exacerbate and expand the range of this problem.

5. Primitive Qualities of Project Area

a. Impacts to Primitive Recreation

The Little River Roadless Area/Potential Wilderness Area is the area with the highest primitive recreation potential in the entire GWNF. It is a value which needs to be heavily considered in every project and every plan. Primitive recreation, as part of the Recreational Opportunity Spectrum, is the most deficient type of recreation in the forest. The Little River Area is the area with the greatest potential to provide true primitive recreation. The Big Run Project further degrades this area and reduces the area which may be considered primitive. As the 2007 Draft Comprehensive Evaluation Report for the GWNF Revised Plan states on page 129, "survey data confirms the need for ... avoiding loss of opportunities tied to the more primitive/remote settings found primarily on the national forests."

b. Motorized Vehicle Access

The proposed building of .75 miles of roads would greatly facilitate illegal motorized use and trespass, poaching and other nonconforming uses, further degrading the values and conditions of the area. Gates and "trap ponds" do not prevent these activities, as evidenced by the significant amount of ongoing, illegal all terrain vehicle (ATV) use on the GWNF, including in inventoried roadless areas. An increase in illegal use of closed roads and illegal ATV use is likely if this project is carried out. The EA fails to address this though. The Forest Service must fully consider the direct and indirect impacts of the proposed action from facilitated ATV and off-highway vehicle use.

6. The 2001 Roadless Area Conservation Rule

In identifying and mapping the Little River Potential Wilderness Area, the Forest Service has determined that it meets the definition and criteria for roadless areas. The 1,100 acre portion of the project area falling within the Little River PWA should be managed consistently with the 2001 Roadless Area Conservation Rule, as the Little River Roadless Area and other inventoried roadless areas in the GWNF currently are. The timber harvest and .75 mile of temporary road construction proposed in this project are inconsistent with the 2001 Roadless Area Conservation Rule.

As stated earlier, the Little River PWA is being considered for recommendation for future wilderness designation by the Forest Service in the revised Forest Plan. Proceeding with this project could negatively impact the results of the planning process by degrading the area's roadless characteristics and making it a less desirable candidate for wilderness. Even if only a portion of the Little River PWA is eventually recommended for wilderness designation, the disturbance created by this project could eliminate some areas from consideration and limit the possibilities for future wilderness area. If not recommended for wilderness, Little River PWA should be designated a special area in the revised plan

and managed consistently with the 2001 Roadless Rule. The roadless characteristics should not be harmed by this project before it can be fully considered for appropriate designation in the revised plan.

7. Invasive Species

One aspect of the project area which continues to maintain its naturalness is the lack of significant non-native invasive species in the project area. Because it has been some time since previous impacts, there has been little opportunity for invasives to move into the area. This project runs the risk of changing this significantly as populations of invasives are on the rise all around the area. In order to meet the goal of preventing the spread of invasives into more interior parts of the forest, this project needs to consider the benefits of the no action alternative.

8. Edge Effects and Fragmentation

The EA for this project neither considers nor addresses the impacts of the alternatives on edge effects and fragmentation within the Little River PWA. This analysis is necessary for the full environmental impacts of the alternatives to be considered and presented for public review.

9. NEPA and Consideration of a Range of Alternatives

NEPA requires agencies to “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” 42 U.S.C. § 4332(2)(E). NEPA

In this case, the Forest Service considers only two action alternatives in detail in the EA, the selected alternative (Alternative 3) and Alternative 2. Both action alternatives propose to intensively log this area (315-350 acres). The consideration of only two very similar action alternatives does not meet NEPA requirements that the alternatives considered cover the “*full spectrum* of alternatives. . .” The failure to consider a range of alternatives violates NEPA. As the alternatives we are asked to consider are unduly narrow in scope, the public is impeded from meaningfully participating in this proposal.

For example, the agency did not consider the following:

- a. An alternative that protects unroaded areas between Tilghman Road and the Little River Roadless Area from logging and temporary roadbuilding
- b. Alternatives for single tree or other selection methods

An alternative with lower levels of logging could still accomplish the asserted “need” for this project and achieve Desired Future Conditions in the current Forest Plan with fewer adverse impacts. Low-cut and non-roading alternatives are reasonable, practical and feasible. The option to maintain a "continuous high-forest cover", the hallmark of uneven-aged forest management, is eliminated by the agency’s proposed action. An uneven-aged alternative should have been examined in detail by the planners.

Given the preceding comments and on the project's proposed management activities that will significantly impact the wilderness characteristics of the area, we ask that the portion of the Big Run Project which is currently in the Little River Potential Wilderness Area/Primitive Recreation Area, on the west side of Tilghman, road be withdrawn.

Please keep us informed on any decisions or changes to the proposed Big Run Project.

Sincerely,

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