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April 5, 2010

Mr. Holden Mason, Project Contact Person
Lee Ranger District, George Washington NF
95 Railroad Ave.
Edinburg, VA 22824
comments-southern-georgewashington-jefferson-lee@fs.fed.us

Re: Proposed Breakneck Timber Sale

Dear Mr. Mason:

Thank you for the opportunity to submit comments on the proposed Breakneck Timber Sale in Hardy County, WV. There are several issues I would like to raise, as well as seek additional information on a few.

I am concerned about potential harvesting of old growth forest. If I interpret the "Acres by Age Class" table in the scoping notice of 3/10/10 correctly, 10 acres of forest aged 131-140 years will be harvested. An additional 20 acres of forest aged 111-120 years will be harvested. This is a concern, as stands meeting the U.S. Forest Service Region 8 definition of old growth forest may be harvested. At a minimum, it appears that significant acreage of potential old growth could be harvested. As the scoping notice states, there are "potential old growth xeric pine-oak and dry oak stands" in the project area. A table with ages of the proposed stands to be harvested would have been useful in the scoping notice. Please let me know what steps have been or will be taken to identify old growth and potential old growth in the project area.

I am also concerned about the construction of temporary roads on this proposed project. The amount of roads and their locations are not given. This prevents a thorough assessment of the proposed project.

Some of the proposed cutting units occur on steeply sloping lands. This is particularly true of units 1, 2 and 3. Harvesting of these units, and construction of temporary roads to access them, are questionable from an ecological perspective and could result in excessive erosion and sedimentation.

Buck Mountain Special Biological Area occurs in the project area, yet no mention is made of this in the scoping notice. Proposed cutting units 4, 5, 6, and 10 are within or border Buck Mountain

SBA. I have been unable to locate information about Buck Mountain SBA. The current Forest Plan indicates it is 1,243 acres in size, and is for Single Species management. I request more information about Buck Mountain SBA.

I would also like to point out that proposed cutting unit 9 borders the Long Mountain Virginia Mountain Treasure, lying across FDR 259 from it.

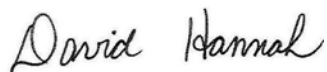
There are a few other considerations when assessing this proposed timber sale. This area of the national forest contains areas of steep, rocky outcrops that are biologically valuable. Timber rattlesnakes and other reptiles may den here. The area also contains important riparian areas. Wood turtle occurrences have been documented along WV Road 344.

I am encouraged that control of invasive species might be included in the project. More information about the species that occur here and the control methods that will be considered is needed.

The scoping notice states there are “no known controversial or unusual aspects” to this project. However, given that the Buck Mountain Special Biological Area is not considered or mentioned in the scoping notice, I feel that more analysis is required. I respectfully request that a new scoping notice be developed and issued.

Thank you for consideration of my comments.

Sincerely,

A handwritten signature in cursive script that reads "David Hannah".

David Hannah
Conservation Director