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August 29, 2008

Elwood Burge, District Ranger
North River Ranger District
Back Draft Scoping Comments
401 Oakwood Drive
Harrisonburg, VA 22801

Dear Elwood,

Please accept the following comments on behalf of Wild Virginia the proposed Back Draft Timber Sale Project.

The project is located on Walker Mountain, a 5596 acre Virginia Mountain Treasure area. I made three site visits, August 12, 18 and 26 and surveyed all units and compartments. Note that we are submitting comments both in print and electronically. The electronic comments contain pictures which should be included for the record.

Findings:

- Cutting units 6-15 are all located in proximity to FS 384 and have been in management for quite a while. FS 384 for over 2/3 of its length is a lush carpet of *Microstegium vimineum* (Japanese Stiltgrass). In most areas it covered the entire 20-25 feet of roadbed and all past loading and deck sites. (see pictures #1,#2)
- Units 11 and 12 are in a particularly moist seep area that is obviously an ephemeral stream bed. Here was found flora remarkably different from anywhere else in the project area. This is one of two biologically sensitive areas I surveyed.
- Units 16 and 17 are most sensitive areas. These units are situated in and along a moderately steep ravine with particularly beautiful geologic rock formations throughout. The forests on either side of the ravine had large trees which, given the location, are likely older than they appear. (pic. #3) Although there is a stand age of 99-103 years given in the scoping notice, no old growth survey information was included. The notice said that no old growth survey had been done in these units. Note that there were many signs of black bear here with a few bear trails (and scat) moving up the mountain in the upper part of the ravine in Unit 17 and in the area just above it.

- The gated Walker Mountain Valley Road, FS 387 on the crest of Walker Mountain was also a 25 foot wide carpet of *Microstegium* (pic. #4 and #5). The other most dominant species was *Alliaria petiolata* (Garlic Mustard), another problematic invasive.
- The north end of FS387 was tank trapped and beyond it a foot trail continued connecting to Back Draft Trail. While the first 100 feet or so had some semblance of a road bed which had become overgrown for many decades into a foot path, beyond was clearly a foot trail, which was even blazed in yellow, clearly marking it as such (pic. #6). My map labels it as “Walker Mountain Trail.” Many of the largest individual trees line both sides of this foot trail. Units 18 (pic. #18), 19 (pics # 19 & 20) and 20 are located along this trail.
- The proposed new road construction linking this area to Clayton Mills Road is, at the top eastern ridge, extremely steep and contains beautiful and fragile geologic formations. There is no way not to destroy incredible steep rocky cliffs in the building of this road.
- Helicopter units 1, 2, 3 (pic. #16 & 17) and 4 (pic. #15) are located in a beautiful and remote location of Walker Mountain, just over the ridge from Back Draft Trail. These areas hold some of the most beautiful and remote forest in the project area. They are dry and relatively unproductive sites and do not show any evidence logging in perhaps a century. No old growth inventory has been done for these sites and, because of the slope and dryness of the site, may be significantly older than it appears.
- The proposed helicopter deck on the edge of Unit 5 is located directly adjacent to the Back Draft trail and on the *opposite* side of Back Draft Trail from the proposed helicopter Units #1-4. Unit 5 is a rich lowland area with active streams throughout including Back Draft (pic # 8, 13 & 14).
- Units 21-25 are on the east side of Walker Mountain. The road that accesses unit 22 is also a carpet of stiltgrass, as are the existing road beds that lead to Units 23 and 24 along the Sam Judd Ramsey Trail on either side of FR 61 (pic. #11). Unit 23 overlaps and is adjacent to the trail.
- Unit 24, although it is proposed that is accessed by the road bed which is Sam Judd Ramsey Trail, the majority of the mature timber lies directly alongside FR 61 (see pic. #12).
- The roadbed leading to and beyond Unit 25 is often a closed mat of *Microstegium* and large cluster patches of Autumn Olive, *Elaeagnus umbellate* extending up Walker Mountain Road (pic. #10)
- The project area is under Management Area 15. Given the existing conditions we found in the project area it is clear that a significant reduction in the scope or elimination of this project would not violate prescriptions for the project area and not conflict with the existing management prescription.

Comments:

- FS Road 384 has become a huge highway for movement of *Microstegium* into more interior areas of Walker Mountain. So has Walker Mountain Road. The obvious use of these roads combined with increased sunlight from the absence of forest canopy along the road has made these vectors for increased invasive populations beyond the road itself. Because *Microstegium* is very shade tolerant, is characterized by prolific seeding and loves moist areas and streamsides, any use of these road, new roadbuilding or

disturbances (units 6-25) will result in increasing its population and range further into more remote areas of Walker Mountain. This is directly contrary to the stated goal of USDA Strategic Plans which identify one of the 4 major threats to forests as the introduction and spread of non-native invasive species (NNIS), which degrade habitat for many native species and diminish biodiversity. Every aspect of this project, roadbuilding, thinning, shelterwood cuts, grapevine/croptree release, linear wildlife openings, deck sites, and all new system and temporary roads, are in direct contradiction to this directive. In fact, the most direct result of this project will be to immediately increase the population and range of *Microstegium* to over 600 acres of Walker Mountain and the long term effects could be catastrophic. The areas most dramatically impacted will be the more remote areas and moist sites. There is no way to mitigate significantly these negative impacts to Walker Mountain. For this reason, **units 11, 12, 13, 14, 15, 16, and 17 should be dropped from the project.**

- Units 1, 2, 3 and 4 and units 16 and 17 have not been inventoried for old growth although they contain some of the oldest stand ages in this project. These areas, **units 1, 2, 3, 4, 16 and 17 must be inventoried for old growth and the project should be re-scoped with this additional critical information.**
- Because of the sensitive biota of the moist and ephemeral stream areas in units 11 and 12, because of the destruction and erosion by the roadbuilding necessary to access them, and because of the *Microstegium* issue mentioned above, **units 11 and 12 should be dropped from the project.**
- Because of their most remote location, significant slope and sensitive geological areas, **units 16 and 17 should be dropped.** Because of this and of the *Microstegium* issue mentioned above, **the proposal to build 1.1 mile of new system road here should also be abandoned.**
- Cutting units 18, 19 and 20 will negatively impact the foot trail now passing through the project area. The existing foot trail would be converted to system road which would negatively impact this for use of the trail by hikers, hunters and equestrians. This is the only area on the top of Walker Mountain which retains any natural character as a narrow mountaintop plateau. It is one of the most scenic and most geologically significant remaining area remaining on the crest of Walker Mountain. Therefore, **units 18, 19 and 20 should be dropped from the project.**
- The linear wildlife opening and grapevine/croptree release units that connect Clayton Mill Creek with Walker Mountain Road would open up the eastern slope of Walker Mountain to a huge increase of *Microstegium*. **The entire linear wildlife opening and adjacent cutting units 21, 22 and 23 should be dropped from the project.**
- Helicopter units 1, 2, 3 (pic. #16 & 17) and 4 (pic. #15) are located in a beautiful and remote location of Walker Mountain, just over the ridge from Back Draft Trail. These areas hold some of the most beautiful and remote forest in the project area. They are dry and relatively unproductive sites which, if logged would not be easily regenerated. Since these units lie just less than 100 feet from private land and because of the slope, logging here will negatively impact the private lands, increasing runoff and sedimentation. These areas do not show any evidence logging in perhaps a century. The forest is much better served by allowing these areas to remain uncut as it is just now becoming a stand with undeniable old growth characteristics. Old Growth is one of the rarest forest types in the GW and while many areas are more appropriate for thinning and wildlife nurturing, these

areas are better managed for old growth. In addition, given the rising cost of fuel and helicopter transportation, it does not now appear that it will be cost effective to invade these areas, especially given their inherent ecological value. No old growth evaluation has been done for these units, which is imperative to fully access the ecological significance of the area. For these reasons, **units 1, 2, 3, and 4 should be dropped from the project.**

- The proposed helicopter deck next to cutting unit #5 is directly adjacent to the scenic Back Draft Trail. This area holds some of the most beautiful forest along this trail. A huge area would be cleared and compacted for loading and helicopter landing. The opening up of the canopy in Unit 5 and use of equipment will open up the area of Back Draft Trail to *Microstegium* invasion. It is also likely that this activity will create pockets of invasion in units 1-4. In a moist, fertile area with many ephemeral and existing streams, this area would be significantly and negatively impacted by any logging. Because of the impacts to the trail, combined with the aforementioned comments regarding units 1-4 above, **Unit 5 and all proposed helicopter logging in this project should be cancelled.**
- **Because of the huge problem with populations of stiltgrass expanding its range into the interior of Walker Mountain, Units 22 and 23 and 25 should be dropped from the sale.** The Linear wildlife opening along Unit 23 that connects to Walker Mountain Road will turn into a carpet of invasive *Microstegium*. Opening the canopy will also likely allow Autumn Olive to establish a foothold in the dry openings created, as it has along south/eastern parts of Walker Mountain Road..

Conclusion:

Walker Mountain is a lovely Mountain Treasure Area. Back Draft Trail and Sam Judd Ramsey Trails are great assets to the area, allowing primitive access and pass through beautiful geologic and wooded areas.

The eastern side of Walker, when you combine the trails with FR 61 and Walker Mountain Road contains loop access for mountain bikes and equestrian opportunities. Sale units 18-25 would severely physically and visually degrade and impact these recreational possibilities.

Walker Mountain Road is a great example of why these sale units and the linear wildlife opening should be dropped. Walker Mountain is a virtual carpet of *Microstegium* throughout its entire 7+ mile length. It is clear that the wildlife corridor proposed on the east side of Walker Mountain would quickly follow suit. It has allowed shade-tolerant *Microstegium* to begin intruding beyond the roadbed and can be found moving deeper into the woods on both sides of the roadbed. Because even the harvest of helicopter units 1-4 need the helicopter landing dock on the edge of unit 5, even these are connected with perpetuating this problem.

It is clear that the main use of Walker Mountain is for hiking, horse riding and hunting. Most of the management has been for wildlife. Shooting ranges and hunt clubs exist in profusion on surrounding lands. We found numerous illegal tree stands (and empty cans of "deer scent") in the cove above Units 16 and 17. Walker Mountain Road, the forest openings along its edges and the cleared loading docks from past sales provide abundant openings for grouse and turkey and deer.

The main problem with *Microstegium* is that it loves to travel along with the hunters and their vehicles during hunting season. Patches we noticed in mid August are already beginning to develop seeds. They remain viable for 5 years or more. This is a problem that will not go away but can be slowed only by limiting access of vehicles and by taking no actions that remove the canopy or extend roads deeper into Walker Mountain.

We believe that hunting can continue to be a viable use of Walker Mountain but it is problematic as management for early successional habitat, wildlife openings and thinning of the overstory creates greater opportunities for invasives than it does for wildlife. Increasing access for management and hunting also facilitates *Microstegium* migration and dispersal as it will be the first to colonize openings and restrict the ability of other wildlife forage. Even disturbing existing forage areas may make these areas less able to sustain the forage it currently holds. Multiple use can continue on Walker Mountain only if some rare and important areas are not managed for early succession, overstory removal, thinning and logging.

The Back Draft Timber Sale will result in a huge expansion of *Microstegium* in population and in range in Walker Mountain. This is in direct contradiction to FS directives.

The project is being scoped under the 1993 Forest Plan and implementation of this project will directly affect the condition of the project area so as to eliminate the project areas from consideration which would result in a higher level of protection in the Revised Plan than is afforded under MA 15. If this project goes forth it will eliminate the project area from such consideration. Therefore implementation of this project at this point will compromise the planning process and the integrity of the project area and should, therefore, be at the very least postponed and rescoped after the new plan has been adopted.

For all the reasons stated above, we ask that the entire Back Draft Timber Sale and all proposed road building and expansion be cancelled.

Thank you for the opportunity to comment. Please keep us informed of any action taken on this project.

Sincerely,

Ernie Reed, for Wild Virginia

Cc: Sarah Francisco, SELC
Sherman Bamford, VAFW and Sierra Club
Carol Lena Miller, VWC