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August 19, 2010

Mr. Patrick Sheridan, District Ranger
James River Ranger District
Peters Mountain Road Relocation Scoping Comments
810-A Madison Avenue
Covington, VA 24426
comments-southern-georgewashington-jefferson-jamesriver@fs.fed.us

Re: Scoping Notice - Proposed Peters Mountain Road Relocation

Dear Mr. Sheridan:

Thank you for the opportunity to comment on the Scoping Notice (SN) for this proposed project. Wild Virginia has some concerns about both the road relocation component of the project and restoring vehicular access to FSR 175.

There does not appear to be a genuine or compelling need for FSR 175. As the SN states, private lands prevent access from the northern end of the road. There is no destination for a reconstructed FSR 175, as a turnaround area would need to be created where Forest Service land borders private land. It would be an out-and-back road, with the only access being at the southern end near SR 600.

Given the backlog of road maintenance needs on the George Washington National Forest (GWNF), re-opening a road that has been effectively closed since 2004 does not seem reasonable or justified. In 2003, the maintenance backlog for the combined GW-Jefferson National Forest was about \$19.34 million (from the 2003 document by the U.S. Forest Service, "Fiscal Year 2004 Forest Service Budget Justification"). The maintenance backlog has grown since that time. There would be significant costs in relocating and constructing FSR 175 at its southern end, reconstructing several miles of the old road, and then ongoing maintenance costs.

A Travel Analysis Process (TAP) is underway forest-wide in the GWNF to identify a minimal road system. Costs, benefits, and risks associated with individual system roads are being assessed and quantified. Results will hopefully be available in the autumn of 2010. TAP results and analysis should be completed before a decision is made on this project.

Significant reconstruction of FSR 175 is inevitable, as it is currently a grassy one lane “road”. Road reconstruction is undesirable, and is not addressed in SN. The SN addresses only the relocation/construction/reconstruction of road from SR 600 to the “existing” FSR 175. Analysis of the ecological impacts of reconstructing and re-opening FSR 175 is needed.

FSR 175 currently serves extremely well as a trail. Access by motorized vehicles is not necessary. Increased access could potentially harm the Thomas Spring wetland area (including Cast Steel Pond and Cast Steel Run headwaters), which is very close to FSR 175. Other areas like Jingling Rocks could also be impacted. There is ample evidence of illegal ATV use at Jingling Rocks (photo attached) and along FSR 175, as observed during a site visit on 8/17/10.

If this project were for *trail construction* instead of road construction, it would *allow access* to Jingling Rocks, old growth areas, and the rare ridgetop wetlands at Thomas Spring without unduly threatening their ecological, hydrologic, and geologic values. There is no indication that there is an access problem other than what has resulted in illegal off-road impacts to Jingling Rocks. The tank traps on the private road at the southern end of FSR 175 are clearly a “keep out” measure by the landowners. Administrative access is not necessary to maintain the special ecological values at this site.

FSR 175 has been effectively closed since 2004. This has provided a tremendous forest restoration opportunity. Roads are one of the primary causes of forest fragmentation and edge effects in the GWNF. Closing roads helps minimize the ecological consequences to the forest (e.g., vegetative structure and composition) and its native wildlife (e.g., salamanders, forest-interior breeding birds) of roads and other fragmenting features.

The project area is within a very valuable ecological area. FSR 175 runs squarely through the middle of the 4240 acre Peters Mountain North Site identified by the Virginia Division of Natural Heritage (DNH). Information from the DNH about the site includes:

- A B2 rank for biodiversity (or “very high” - B1 is highest rank, B5 is lowest).
- Site description is: “A large, contiguous stand of old-growth, oak-dominated forest supports several globally rare ecological communities and rare plant species. This site is an important component of the greater landscape. 08/2006”
- Three biodiversity elements are listed within the site – oak/heath forest, montane depression wetland, and the federally endangered northeastern bulrush (*Scirpus ancistrochaetus*).

Further documentation by DNH indicates that large portions of the old growth sites have probably never been logged.

FSR 175 basically runs through the interior of the Snake Ridge Run, a natural area identified as a Virginia Mountain Treasure in a 2009 publication by The Wilderness Society. A trail would be a very appropriate use of FSR 175, but open road is not. Clearly, based on NHP data and The Wilderness Society publication, this valuable ecological area should be protected and not opened to vehicular traffic.

Two non-native invasive plants, garlic mustard (*Alliaria petiolata*) and Japanese stiltgrass (*Microstegium vimineum*), are abundant in some areas along FSR 175. Other non-native plants could be present as well. Reconstructing the road will likely spread these plants.

The path of the road relocation seems to travel through nice, undisturbed boulder field areas. Very mature, possible old-growth forest is in or near the relocation path too. Surveys for old growth must be done (as indicated in the SN, page 4).

As the SN indicates, this area of Peters Mountain is being considered for designation as Special Biological Area in the forest plan revision. Under discussion are the Cast Steel Pond and wetland area and areas of old growth forest. No action should be taken that could potentially impact decisions about Special Biological Area designation. This project should not proceed before those decisions are made.

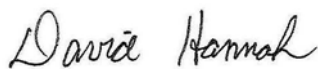
Cast Steel Run (at base of a north facing slope) is a Class II Wild Trout Stream, per the Virginia Dept. of Game and Inland Fisheries. FSR 175 crosses the headwaters of Cast Steel Run, and increased traffic, particularly by motorized vehicles, would impact the stream. A large segment of the proposed relocated road parallels Cast Steel Run, and is less than 0.2 miles uphill of the stream in places, on a very steep gradient. We believe the project could impact the trout waters.

As the SN indicates, the Great Eastern and Alleghany Trails are being developed, and trail alignments fall within the project area. A reconstructed FSR 175 could certainly negatively impact one or both trails.

Reconstructing and re-opening FSR 175 could create demand for other roads, with further negative impacts to the natural area. Rather than reconstruction, FSR 175 should be considered for closing and decommissioning.

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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