



July 26, 2018

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Dear Ms. McNichols:

Re: Duncan Knob Gypsy Moth Project Scoping Comments

*Board of Directors:*

Dear Ranger McNichols:

*Reiko Dogu*

Initially, it is important to ask, what are the ecological purposes and benefits of the gypsy moth (*Lymantria dispar*), shoestring rot (*Armillaria* root disease), and the two-lined chestnut borer (*Agrilus bilineatus*)?

*Bette Dzamba*

*Howard Evergreen*

These insects and fungi primarily affect individual trees and stands that are less healthy, stressed or physically compromised.

*Katie Keller*

*Jennifer Lewis*

The defoliation connected with gypsy moth presence opens the canopy creating a mosaic pattern that allows sunlight to penetrate deeper below the canopy and reach the forest floor and other flora. The frass that results from gypsy moth activity adds important nitrogen and nutrients to the soil, further stimulating growth and providing additional benefits for ground plants, seedlings and lower and mid-story flora. Some mortality of individuals can result with most trees responding with a second flush of leaves in summer and early fall.

*Laurie Miller*

*David Sellers*

*Deirdre Skogen*

*Elizabeth Williams*

Shoestring rot and the chestnut borer can also lead to stress and mortality. But the result of these interactions in the forest is to open the canopy, increase snag and down woody debris production and create a more diverse and healthy forest habitat. And it does so without the negative impacts of soil compaction and erosion, road improvements, and removal of carbon from the forest. The road improvements and more extensive mechanical removal will create many more opportunities and vectors for increased populations and range distribution of non-native invasive populations deeper into the forest.

These organisms have a role in those natural processes that create conditions for mosaics of habitat—Management Prescription 13—without the negative listed above.

On two site visits in spring and summer 2017 to inventory for rusty patched bumble bee (*Bombus affinis*) populations the jeep road where units 1-5 reside, documented some sparse defoliation and very little mortality along the road.

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Both the Forest Plan and the Farm Bill reflect the basic flaws inherent to this and other similar projects in that they ignore the benefits and fails to document the impacts to the forest from natural processes that are all part of the forest ecosystem and provide important functions in the forest. The GWNF goals, objectives, management and staff consistently fail, as we have pointed out time and time again over the past decade, to account for natural disturbances in its inventory of forest conditions and forest history and fail to consider them in achieving any desired future condition of project areas. Defoliation and tree mortality from insects, fungi, ice storms, windthrow, fire, drought and rain events are routinely ignored for their essential benefits and values to forests. The ecological history of the landscape in areas in and surrounding projects are routinely ignored in project analysis.

Also ignored is the effect of the project on the carbon budget of the project area. Removal of carbon resources from the forest disrupts carbon balance of the area that natural disturbances retain both in the short and long term. Preserving the energy circuit that balances life and mortality in the forest soils and structures preserves precious carbon resources that mitigate climate change and maintain more balanced temperature and hydrological fluctuations.

The cost-benefit analysis of this project ecologically shifts the balance farther away from a healthy forest. “The first rule of intelligent tinkering is to save all of the cogs and wheels.” The benefits of cancelling this project far outweigh the costs of implementing it. In an environment that is likely to see increased mega-disturbances throughout the forest any proposal considered by the Forest Service must consider the project in context with these widespread impacts.

Thank you for considering these comments.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
David Sligh  
Conservation Director

cc: Karen Overcash, GW&JNF