



March 8, 2019

P.O. Box 1065  
Charlottesville, VA  
22902  
(434) 971-1553  
www.wildvirginia.org

Mary Yonce, District Ranger  
North River Ranger District  
401 Oakwood Drive  
Harrisonburg, VA 22801  
[comments-southern-georgewashington-jefferson-northriver@fs.fed.us](mailto:comments-southern-georgewashington-jefferson-northriver@fs.fed.us)

Dear Ranger Yonce:

*Board of Directors:*

Re: White Pine Thinning Project Scoping, North River Ranger District

*Bette Dzamba*

Dear Ranger Yonce:

*Howard Evergreen*

I submit these comments in response to the scoping notice (Notice) for this proposal, dated February 5, 2019. Our concerns are as follows:

*Katie Keller*

*Brian Lux*

- As the Notice states, proposed harvest area 3 would impact a tract designated a potential wilderness area (PWA) in the Forest Plan. We encourage the Forest Service to avoid this area. While the agency may assess the type and degree of impacts the project would have on the wilderness characteristics of this tract, the fact that *any* such impacts will be caused seems to outweigh the rather limited value of including this harvest area.

*David Sellers*

*Deirdre Skogen*

*Jamie Trost*

*Ryan Wagener*

*Elizabeth Williams*

- The Notice states that a combined length of one mile of “constructed temporary road segments” would be used to access three thinning units. Any new roads, even temporary ones, create additional threats for establishment of non-native invasive species in the disturbed areas. Given that the Forest Service fights an ongoing and losing battle against invasive plants across the Forest as a whole, we believe any new roads that can be avoided should be. An alternative that proposes no new proposed roads should be included in the environmental analysis.
- The Notice states: “It is anticipated this project can be categorically excluded under 36 CFR 220.6(e) (6) - timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than one mile of low-standard road construction.” We assert that use of this categorical exclusion (CE) would be inappropriate and would unlawfully exempt this project from the full environmental review needed to assess whether significant individual and/or cumulative impacts would result.

**Protecting Your Favorite Wild Places**

*Printed on 100% Post Consumer Recycled Paper*

Mary Yonce, District Ranger  
March 8, 2019

We urge the Forest Service to instead proceed with an Environmental Assessment (EA) for this project and to issue a draft EA for public comment before issuance of a draft record of decision. Through this sequence of actions, the public will have the chance to fully understand and effectively comment on the analysis in the DEA, without being forced to mount a court challenge if it appears that the action is in conflict with the law.

Thank you for considering these comments.

Sincerely,

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

cc: Karen Overcash, GW&JNF