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August 10, 2009

Mr. Elwood Burge, District Ranger
North River Ranger District
Rocky Spur Scoping Comments
401 Oakwood Drive
Harrisonburg, Virginia 22801
comments-southern-georgewashington-jefferson-northriver@fs.fed.us

Re: Scoping Notice - Proposed Rocky Spur Timber Sale

Dear Mr. Burge:

Please accept the following comments on the scoping notice for the proposed Rocky Spur Timber Sale. These comments are in addition to other comments submitted today by the Southern Environmental Law Center (SELC), on behalf of themselves, Wild Virginia, and several other organizations.

We have significant concerns about the project, many of which are detailed in the SELC comments. We are particularly concerned that the lack of detail in the scoping notice prevents substantive review and comment. There are a number of activities that, according to the notice, “may” be included as part of the project. Among others, these are:

- Prescribed burn of approximately 275 acres
- Restoring Blue Hole swimming hole in the North Fork of the Shenandoah River
- “Day-lighting” from the shoulders of forest roads 302B and 302C
- Inventory for invasive species and take appropriate action to control

No information at all is provided about the possible prescribed burn, and pertinent comments are thus not possible. Much more detail is needed (e.g., location of fire lines and ignition points, nature of the fire lines – natural or existing breaks vs. constructed, etc.) before this activity takes place. Further, the stated goals of a fire are fairly general, “to improve wildlife habitat conditions by enhancing huckleberry production and oak regeneration.” More specific objectives, which are measurable, are needed. A plan to monitor and quantify the results of a potential burn are also needed.

The North Fork of the Shenandoah River is a very important source of public drinking water. Six Virginia localities obtain some or all of their drinking water from the river downstream of the project area. As numerous environmental documents authored by the Forest Service for projects in the George Washington National Forest (GWNF) have stated, “On National Forest System land, sedimentation is the primary factor in water quality degradation.” Yet, no information at all is provided about restoring the Blue Hole swimming hole, much less what impacts there may be to water quality or aquatic habitat and species. We do not even know if the use of heavy equipment is being considered. Given that roads and other disturbed areas are often a source of excess sediment, the possibility of “day-lighting” along existing forest roads also needs to be closely examined. Through the removal of trees along the shoulders of roads, there is potential for creating excessive sedimentation.

The prospect of inventorying the invasive species in the project area, and taking appropriate control actions, is laudable. However, given the research and field work required in developing the scoping notice, there should be some level of information currently available about the presence or absence of invasive species. This is not provided in the scoping notice though. Further, the potential control methods are neither identified nor discussed. Since methods of controlling invasive species are not always environmentally benign, more information is needed.

Finally, we wish to reinforce concerns that are discussed in greater detail in other comments, submitted by SELC on behalf of Wild Virginia and others, on this scoping notice. Some of our major concerns with the proposed timber sale are:

- Portions of the project area occur within, adjacent to, or in close proximity to the Beech Lick Knob Potential Wilderness Area (PWA), as identified in the forest planning process for the GWNF. An even larger portion of the project area occurs in the Beech Lick Knob area identified in *Virginia's Mountain Treasures*. All cutting units and activities within these two areas should be dropped from the proposed project.
- In designating the Beech Lick Knob PWA, the Forest Service recognized that it meets the definition of a “roadless area.” The PWA should therefore be managed according to the 2001 Roadless Area Conservation Rule.
- No decision on this project should be made until the revised Forest Plan for the GWNF is completed. Carrying out the project would have significant impacts on the PWA, and thus its viability as potential wilderness. No activities that could affect current or future decisions about the PWA should take place.
- A detailed analysis of environmental impacts and alternatives to the proposed timber sale project is needed. A draft Environmental Assessment should be available for public review and comment before any decisions about the project are made.
- Analysis of the potential cumulative effects of this project and the proposed Marshall Run Timber Sale is needed.
- Based on stand ages, some of the cutting units may contain old-growth forest, or are approaching old-growth conditions. The scoping notice is not specific as to what type of field work was conducted to identify potential old-growth, and what portions of the project area were included in the field work. Old-growth surveys should be conducted on all the cutting units identified in the scoping notice.

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,

A handwritten signature in black ink that reads "David Hannah". The signature is written in a cursive style with a large initial 'D'.

David Hannah
Conservation Director
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