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February 4, 2010

Mr. Fred Huber, Project Team Leader
George Washington and Jefferson National Forests
Invasive Species Control Scoping Comments
5162 Valleypointe Parkway
Roanoke, Virginia 24019
comments-southern-georgewashington-jefferson@fs.fed.us

Re: Scoping Notice – Controlling Non-native Invasive Plants

Dear Mr. Huber:

Thank you for the opportunity to submit comments concerning the scoping notice for two multi-year, forest-wide actions: 1) Control infestations of non-native invasive plants (NNIP), and 2) Control unwanted woody vegetation in wildlife openings, roadside corridors, and utility corridors. Please accept the following comments.

We applaud the first action, controlling NNIP. When done wisely and effectively, controlling NNIP can help restore the forest – its health, ecological integrity, and biological diversity.

We have concerns about the second action though, controlling “unwanted vegetation” in wildlife openings, roadside corridors, and utility corridors. It is important to control NNIP in these and other areas of the forest. The definition of “unwanted vegetation” is very problematic though, especially when applied forest-wide. We also believe the practice of creating and maintaining wildlife openings is generally unnecessary in managing the forest, and is often ill-advised. We believe that wildlife openings should not be included as part of the second action. We further believe the two proposed actions should be considered separately, not in tandem. All the following comments are directed toward the first proposed action.

Page 2 of the Scoping Notice lists four specific needs that have been identified. The fourth need is: “Control NNIP and woody plants that are impeding tree regeneration or damaging wildlife habitat improvements”. In general, NNIP are an ecological threat such that consideration of control measures are warranted in most places they are found. However, “woody plants”, “tree regeneration” and “wildlife habitat improvements” are very general terms, and much more detail is needed in order to provide comments. As is, the statement is much too broad to be of use.

The Priority NNIP Species table (p. 3 Scoping Notice) raises some questions. Japanese stiltgrass, garlic mustard, and spotted knapweed are given the lowest priority for control, even though they are highly invasive. This includes areas where ground disturbance has occurred where existing populations are present (table of Priority Treatment Areas for NNIP Control, p. 4 Scoping Notice). These species could establish themselves quickly and strongly in these circumstances.

Road surveys by the Virginia Native Plant Society-Shenandoah Chapter during the past few years indicate that garlic mustard and Japanese stiltgrass are likely the most prevalent NNIP in the North River Ranger District. The Priority NNIP Species table may need more review. We also want to confirm that newly introduced NNIP can be considered for control measures simply by being added to one of the invasive species lists referenced in Appendix A of the Scoping Report.

The Priority Treatment Areas for NNIP Control table (p. 4 Scoping Notice) seems basically sound. The Wilderness and Wilderness Study Areas should be limited to manual treatments only, as the table states. Inventoried Roadless Areas throughout the Jefferson and George Washington NFs and Potential Wilderness Areas in the George Washington NF (as identified in the ongoing forest planning process) should be added to the list though.

The “Area” definitions in the Priority Treatment Areas table need to be strengthened. Wording referring to when “ground or vegetation disturbing management is planned” (or has occurred) and “there is an existing population of Priority . . .” is too general. The definitions need more detail, and should account for nearby existing populations of NNIP, not just those that occur within a project area. Determinations on what to treat may sometimes need to be made on a case by case basis, depending upon the needs and conditions of an area (see discussion of Japanese stiltgrass, garlic mustard, and spotted knapweed above).

The list of Proposed Herbicides (pp. 4-5 Scoping Notice) is lengthy. Presumably, not all the herbicides would actually be used. The proposed herbicides, their potential use with specific plants, and the application methods (as described in Appendix B of the Scoping Report) requires more review on our part.

The potential area to be treated, totaling thousands of acres per year, is very significant. Proper treatment methods are critical. The Decision to be Made (p. 5 Scoping Notice) should:

- include mitigation and remediation efforts for NNIP treatment areas
- include methods to monitor treatment results, for a period of several years
- not include a decision for the second action (Control unwanted woody vegetation in wildlife openings, roadside corridors, and utility corridors)

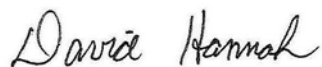
The Other Management Actions section (p. 12 Scoping Report) should include options and discussion of revising current forest management activities. Preventative measures by Forest Service staff, including management decisions that decrease ground disturbing activities, should be considered and discussed in order to decrease future NNIP infestations.

In general, manual, cultural, and mechanical treatments to control NNIP should be emphasized, and chemical treatments used only when necessary. The Methods of Treatment section (pp. 6-7 Scoping Report) seems consistent with this.

Given the high level of concern about water quality, both by local communities and the Forest Service, there should be a high level of concern for herbicide use as well. Provisions are needed for water quality analysis, to ensure that herbicides (and their major breakdown products) are not harming water quality or watersheds. While this would add to the cost of controlling NNIP, it is critical to do so and would provide important information.

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 cursive script that reads "David Hannah".

David Hannah
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