



November 8, 2016

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Elizabeth McNichols  
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Sent Via Email

Re: Lockridge Cross Region Collaborative Prescribe Burn Project

*Board of Directors:*

Dear Ranger McNichols:

*Devon Callan*

*Bette Dzamba*

*Howard Evergreen*

*Jennifer Lewis*

*Laurie Miller*

*Ernie Reed*

*David Sellers*

*Deirdre Skogen*

*Elizabeth Williams*

I am submitting these comments on the referenced project on behalf of Wild Virginia. The proposed project, by its definition, is inextricably connected to the much larger project on the Monongahela National Forest. The 14 acres of land on the Warm Springs District, in two sections, are very minor additions to the adjoining prescribed burn area of 2,439-acre area that was approved in April, 2014 (Lockridge Prescribed Burn Project Decision Memo, Marlinton-White Sulphur Ranger District). Because of the close connection between these projects, we submit that it is improper to consider the current proposal separately from the larger portion of the Lockridge Burn and respectfully request that you to withdraw or reject the project.

The objective of any public participation process conducted by the Forest Service (FS) is to allow the public to understand and effectively comment upon actions the agency is considering. Both FS regulations and NEPA require that when a project is so closely connected to another, in terms of the resources that could be affected and/or the activities proposed, then the only way the FS can properly assess either activity is to look at both together. Likewise, the public must be allowed to comment on the combined activities. The fact that this proposal and that previously approved in West Virginia are in different National Forests is of no significance in relation to the environment affected or the nature of those impacts. The ecosystems know nothing of state lines or Forest boundaries.

You have made a preliminary determination that this project falls under a categorical exclusion. A prerequisite to a valid finding of categorical exclusion is that "there are no extraordinary circumstances related to the proposed action." 36 C.F.R. § 220.6(a). The public must be allowed to express its view as to whether the entire "Cross Region" project meets this standard. We were deprived of that opportunity when the Monongahela portion of this unified activity was under review during the period 2012 - 2014, because we could not anticipate that activities on the George Washing National Forest (GWNF) would be included. Wild Virginia generally works on only those FS lands within Virginia and is on the distribution lists for projects on those areas.

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We also question the value of this action on the GWNF and ask whether it will contribute to the purpose described for the entire “Cross Region” project in any meaningful way. The FS already has the authority to affect the forests of this region through burns on the lands in the Monongahela NR. If you decide to go forward with this proposal, we think it is incumbent on you to describe the ways in which this action will benefit the ecosystem as a whole and whether the expenditure of resources needed to accomplish any such benefits are justified, especially given the shortage of resources the GWNF frequently cites. Further, though the GWNF has broad goals for the maintenance and restoration of certain habitats that could be achieved through this action, the addition of a mere 14 acres to the forest-wide total seems negligible.

Thank you for the chance to comment on this proposal.

Sincerely,

/s/ David Sligh  
David Sligh  
Conservation Director

cc: Karen Overcash, GW&J NF