



Sept. 14, 2019

Mary Yonce, District Ranger
North River Ranger District
401 Oakwood Drive
Harrisonburg, VA 22801

Re: Draft EA for the North Shenandoah Mountain Restoration and Management Project

Dear Ranger Yonce:

I am submitting comments on the North Shenandoah Mountain Restoration and Management Project (NSM) on behalf of Friends of Shenandoah Mountain (FOSM), a coalition of over 400 organizations, businesses, and faith groups working toward Congressional designation of the Shenandoah Mountain National Scenic Area and embedded Wilderness Areas.

FOSM is pleased to see completion of the Draft Environmental Assessment for this large landscape level project. We appreciate the meetings and field trips you organized to provide us and others with an opportunity for input. We attended most of these. Thank you for taking public comments into consideration as you developed the project.

As members of the GWNF Stakeholder Collaborative, we support management activities in the project that will:

- increase resilience;
- help reach goals of ecological restoration;
- increase young forest habitat; and
- diversify structure in low-diversity stands, using a variety of activities, such as prescribed burning and tree-cutting

We applaud proposed activities that benefit special species and biodiversity, such as planting blight-resistant American chestnut trees, improving wood turtle habitat, control of nonnative invasive species (a growing problem across the Forest), and replacement of culverts to benefit aquatic life.

We were pleased to see that the biological surveys revealed previously unknown occurrences of Cow Knob Salamander and that these areas will be protected by the Shenandoah Mountain Crest-Cow Knob Salamander Agreement of 1994.

While we recognize the many benefits prescribed fire and cutting timber can yield to the health of the forest, we offer a few words of caution.

- **Rare and Endangered Bees.** Given the biodiversity of this region, we were not surprised that surveys found rare bees in the project area. It will be important to avoid any impact to these populations as the project is implemented. We would also like to stress the importance of making sure the Rusty Patch Bumble Bee, found just outside the project area, is not harmed by project activities. We look forward to learning more about this after your consultation with USFWS.

- **Nonnative invasives** Increased light to the forest floor can give nonnative invasive plants an opportunity to take hold and spread. It is imperative that any activities, be it timber cutting or burning, be followed up by monitoring for and control of invasive plants. Please make this a priority for funding.
- **Impact on trails**. We have noticed that in the Hone Quarry area that repeated prescribed burning has resulted in trails becoming impassable due to loss of canopy, increased sunlight, and rapid growth of briars and other fast-growing vegetation. The Forest Service has not followed up on these burns by keeping trails cleared. Volunteer trail maintainers are overwhelmed with the increase in the amount of work. Some fear these trails will be unmaintained, unused, and eventually removed from the trail system. We realize the benefit of using trails, rather than dozer lines, as fire breaks, but fire often has detrimental impacts to trails. Please take this into consideration by preventing fires from burning too hot and killing the trees beside the trail, by avoiding burning across trails, and by following up to keep trails cleared after prescribed burns. Only one trail would be affected in the NSM project, but it is one of only a few trails in the whole project area.

Though recreation was excluded from this project, we hope that the GW/Jeff will soon officially add Carr Mountain Trail to the trail system in the North Shenandoah Mountain area. This trail has been in the works for over a decade and would be a nice addition to the North Shenandoah Mountain project area, where so few trails exist.

Our hope is that this project, when implemented, will restore forest health and meet the goals of diverse stakeholders, and that Beech Lick Knob, a core wild area that the Forest Service recommended for Wilderness designation in the 2014 revised plan. will be permanently preserved through Congressional designation as Wilderness.

Given the collaborative nature of this project, FOSM urges the District to commit to continuing this collaboration throughout implementation, as the Warm Springs District did with the Lower Cowpasture project. We have found the regular field trips and update newsletters immensely useful in continuing collaboration throughout implementation.

Thank you for the opportunity to comment.

Sincerely,

Lynn Cameron
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