

September 14, 2019

To whom it may concern:

The following comments are presented for the *Draft Environmental Assessment: North Shenandoah Mountain Restoration and Management Project*. These comments specifically focus on the Mitchell Knob and Camp Run Working area.

All comments are provided as a private citizen and are not presented on behalf of or in association with any employer.

Sincerely,

Jennifer Flippin
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General Comments

- 1) Environmental impact is broadly given for the entire project area. The specific considerations, caveats, data, and potential outcomes for the smaller working areas should be more clearly specified along with supporting data, especially when statements are made to suggest minimal impact to resources. Alternatives should be provided for each working area.
- 2) The remainder of these comments refer to the proposed activities in the Mitchell Knob/Camp Run working area.
- 3) It is not clear how project areas were chosen nor the rationale for selection of specific tracts for thinning activities. Additionally, it is not clear why thinning activities were chosen instead of another endpoint such as improvement of aquatic habitat.
- 4) If thinning and logging related activities are not to be performed in riparian areas of streams, then maps should be updated to reflect these buffer zones. Streams should be labeled and classified according to their status (perennial, intermittent, or ephemeral) to clearly show what buffers and BMPs will be used in conjunction with these areas.
- 5) The *Draft Environmental Assessment* frequently refers to published literature and data that were collected as part of the assessment and used to support recommendation of proposed actions. In order to improve transparency, all studies should be cited and also be made available in PDF format for online review. For example:
 - Page 12: *Numerous studies indicate that a considerable portion of the GWNF was more "open" or park like prior to the 19th century as described above*. Please provide citations for this statement.
 - Page 91 and 92: *A detailed biological evaluation/biological assessment was completed for the North Shenandoah Mountain project, which analyzed potential negative and beneficial effects to federally listed and to Region 8 sensitive species within project areas or with habitat potential in the project area.... A copy of the BE/BA can be found in the project planning file at the North River Ranger District Office in Harrisonburg, Virginia.*
This document should be made available online in PDF format and online to allow for review.
- 6) Several documents included as part of the *Draft Environmental Assessment* materials were added to the website on 9/6/2019 (<https://www.fs.usda.gov/project/?project=50342>). The official comment period should be extended if these documents are to be reviewed as part of the *Draft Environmental Assessment*.
- 7) Many of the tributaries within the South Fork South Branch River presently serve as and/or previously served as brook trout habitat. The construction of flood control dams in the 1960s altered or eliminated suitable habitats in some of these tributaries. No flood control structures exist on Buck Lick Run (Kettle Creek watershed). Thinning operations may cause adverse impacts to this watershed (ex. decreased shade, increased sediment, etc.) and negatively influence sensitive aquatic taxa. It does not appear that baseline data for Buck Lick Run or recent data for other local streams were collected. Thus the ability to quantitatively assess stream damage from proposed

activities is extremely limited. Consider removing all thinning operations from the area around Buck Lick Run.

Aquatic Resources

- **Page 17, Section Aquatic Species Habitat.** The document states that Camp Run Reservoir in West Virginia is an 8-acre warm water fishery. While this is currently the case, it should not be assumed that the rest of the system supports or is natural habitat to warm water species. Camp Run supported populations of brook trout before the construction of the flood control dam, thus the watershed can support cold water organisms.
- **Page 19, Table 9.** Please specify which streams within the Mitchell Knob and Camp Run Working area are considered as coldwater habitat or West Virginia wild brook trout stream. If streams within the project area are not classified as coldwater habitat, please specify their classification.
- **Table 28, page 116.** This table lists the summary of coldwater streams within the project area and shows only two streams for WV—Capon Run and Rough Run. These categories are provided by WV Division of Natural Resources (DNR) but it is unlikely that most the streams in the Mitchell Knob/ Camp Run project area have been surveyed by DNR. Thus, lack of data does not mean that other streams do not represent Cold Water Habitat; it just indicates they may not have been classified yet.

Observational data including presence of native brook trout and a diverse and a sensitive macroinvertebrate assemblage indicate that at least two streams in the Kettle Creek watershed (Lick Run and Buck Lick Run) also contain coldwater habitat. Similarly, Little Rough Run historically served as habitat for brook trout. The proposed thinning, regeneration, and forest stand improvement activities should be removed from these watersheds to prevent adverse impacts to these brook trout populations.

- **Page 119 and Table 29.** On page 119, the EA states that

The importance of long term trend data should be noted since the scores can range depending on local variables.

However these data either do not exist for most of the streams within the Mitchell Knob/ Camp Run project area or are dated. The most recent observation for Rough Run (n=1) is in 1997 and Little Camp Run in 1995 (n=2). Three data points that are 20 or more years old and do not constitute a long-term data set, nor do they adequately describe the condition of streams within the project area. No data are available for Buck Lick Run which will, under the proposed activities, experience significant thinning activities. Lack of data for streams within the proposed thinning, regeneration, and forest stand improvements mean that potential damages to the aquatic ecosystem in the proposed project area cannot be adequately assessed.

Sensitive Species

- **Appendix 8, Page 214:** The “Occurrence Analysis Results” for *Heuchera alba* (white alumroot) indicate that it is categorized as “Code 4—Species occurs in project area, but outside of activity area.” This plant is listed as S2 in West Virginia. It has been identified within Rough Run watershed by a *Heuchera* expert, and the plant was located at an elevation of approximately 1,700 feet, a lower elevation than its previous range indicated. It may also occur in similar environments in the Kettle Creek watershed. For this reason, thinning activities should be reconsidered.
- **Table 25, White alumroot, *Heuchera alba*; Page 104:** Table 25 states that *One detection of this species was recorded in botanical surveys completed by Virginia DCR/DNH near the edge of unit 65. This unit is no longer proposed for harvesting for other reasons, so there will be no project impacts to this population. In following Forest Plan direction to protect R8 Sensitive plant species, the implementation of this project will have no appreciable negative impacts that would cause loss of species viability on the Forest or cause a trend towards federal listing under the Endangered Species Act.*
Because the results of the biological evaluation/biological assessment do not appear to be accessible online it is unclear whether the areas within the Mitchell Knob/ Camp Run Working Area were evaluated for presence of *Heuchera alba*. It was identified late spring 2019 in the Rough Run watershed.

Aesthetics

- **Page 56:** The *Draft Environmental Assessment* only accounts for aesthetics associated with level 1 and level 2 travel ways. These routes are either major roadways or secondary roadways. It does not appear that any consideration of aesthetic value is given for viewpoints for smaller state roads or private lands adjacent to areas selected for thinning activities. Some smaller state roads will be used to access areas of proposed thinning. Please provide details about what standards will be used (if any) to protect the aesthetic value when near any roadway or private property.