

October 25, 2019

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Mary Yonce, District Ranger
North River Ranger District
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Re: Additional Comments on Draft Environmental Assessment for North Shenandoah Mountain Restoration and Management Project

Dear District Ranger Yonce,

Thank you for the opportunity to provide additional comments on the Draft Environmental Assessment (EA) for the North Shenandoah Mountain Restoration and Management Project. As you know, we submitted comments on September 16, 2019. On September 23, 2019, you provided an additional 30 days for comment. Consequently, I submit the below additional comments on behalf of the Southern Environmental Law Center (SELC). In an effort to keep these comments brief, I will not repeat the substance of the earlier comments. Note, however, that these comments supplement our September 19 comments and attachments; they do not replace them.

- As we have said, we appreciate the District's efforts to reduce negative impacts to and improve conditions for wood turtles in the Slate Lick area. Having now read the September 15, 2019 comments on the Draft EA submitted by wood turtle expert Steven Krichbaum, Ph. D., we urge the District to consult with Dr. Krichbaum regarding necessary measures and to consider an alternative including the measures he describes. These include but are not limited to: a 300-meter buffer around occupied wood turtle streams in which road building and timber harvest would not occur and avoiding prescribed burns in wood turtle habitat. With regard to prescribed burns, we wonder whether wetter conditions near the river and wood turtle habitat would allow prescribed fires to burn out naturally with a commitment by the District that it would not ignite/re-ignite fires in this area to force fire through wood turtle habitat. As Dr. Krichbaum explains in his comments, the proposed activities could result in death or significant injuries to this important species.
- The District should consider an Alternative that does not construct or "adopt" new system roads or at least decreases this amount to the absolute minimum. Adding 2.15 miles of new system roads in one project is significant, particularly when the Forest Plan EIS analyzed the construction of only 15 miles of road construction *in a*

decade.¹ Moreover, the Forest Plan provides there “will be net decrease in the road mileage over the next ten to fifteen years,” and provides that 100-200 miles of roads should be decommissioned in the first decade.² The Plan FEIS contemplated decommissioning of 160 miles of roads and a net reduction of 328 miles of system roads at the end of 10 years.³

What is the status of road construction and decommissioning across the GWNF under the new plan? The Plan is now five years old, meaning we are now halfway towards the end of that first decade. Is the Forest halfway towards the above goals? Absent information showing the Forest is on track to meet Plan and FEIS targets related to roads, it is difficult to justify construction of additional system roads. We look forward to discussing this issue with the District.

Moreover, given the presence of mile-a-minute and other non-native invasive species in the area off of Little Shoemaker Road (FSR 555) and the threat of spreading NNIS into the Shoemaker River watershed and connected drainages, we are particularly concerned about constructing new road in this area.⁴ The District should consider an alternative that does not propose road construction here.

- The Draft EA contains no analysis of climate change, simply stating that “this analysis will tier to the Forest level briefing paper that addresses project level climate change and carbon sequestration concerns.”⁵ This is inadequate. The District must analyze the potential impacts, including cumulative impacts, of this project on climate change and insure adequate information about climate change effects is available to the public for review. The District should provide specific, quantifiable details about how the project will affect the balance of greenhouse gas emissions and sequestration. This analysis should be provided before any decisions are made or any actions are taken. Adaptation actions should be specified so as to be sure that they are actually responsive to the realities of climate change, and the monitoring plan should be updated to take climate change into account.

¹ FEIS at 3-367.

² Plan at 3-22 and 3-23.

³ *Id.*

⁴ See SELC Sept, 20, 2016 comments at 11-12; Feb. 26, 2017 comments at 2-3, 8, 11-13; Nov. 6, 2017 comments at 9-10, 11.

⁵ Draft EA at 70.

Thank you again for the opportunity to comment on the Draft EA. We look forward to this project moving forward and continued collaboration with the District and other stakeholders. We will be in touch with you to follow up on all of our comments and remaining questions about the project. We also look forward to continuing to offer input on the project as it enters its final stages of planning and to reviewing the proposed decision.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristin Davis', followed by a period.

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Attachments

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