



November 2, 2020

Submitted online at <https://cara.ecosystem-management.org/Public//CommentInput?Project=52953>

Theresa Tanner, District Ranger
James River District
George Washington and Jefferson National Forests,

Re: Potts Creek Vegetation Management Project

Dear Ms. Tanner,

Thank you for the opportunity to comment on the October 6, 2020 scoping notice for the proposed Potts Creek Vegetation Management Project. We offer the following brief comments on behalf of the Virginia Wilderness Committee and the Southern Environmental Law Center.

Potts Mountain Potential Wilderness Area. We are pleased that the scoping notice acknowledges the Potts Mountain Potential Wilderness Area (PWA) within the project area, clearly identifies management proposed within the PWA, and affirms that the EA will include analysis of any potential effects of the proposal on the PWA. We are glad the District is focusing on prescribed fire in this area and is no longer considering commercial timber harvest within the PWA (as was discussed previously in a pre-scoping field trip). When planned and implemented properly, prescribed fire can have many benefits for an appropriate landscape.

Importantly, based on our current understanding of the proposal, we do not believe this burn would affect the area's PWA characteristics and would not affect its status in any future PWA inventory. This is essential to avoid the need for an EIS.¹ Accordingly, the District must ensure and explicitly document in project documentation that the implemented prescribed fire would not affect the PWA characteristics and would not disqualify the area from inventory and consideration in future PWA analysis (i.e., that the prescribed fire would not alter the undeveloped character of the PWA). This was the successful approach taken with the Lower Cowpasture and the North Shenandoah projects, and we encourage the District to do the same here.²

¹ Impacts that would affect an area's future status and eligibility to be considered are inherently "significant" and therefore must be considered in a full EIS.¹ Indeed, the agency normally requires an EIS for any proposal that would substantially alter the undeveloped character of an uninventoried roadless area or potential wilderness area. 36 C.F.R. 220.5(a)(2).

² See Lower Cowpasture Final Environmental Assessment (July 2015) at 202 ("Neither of the action alternatives would substantially alter the undeveloped character of any of the potential wilderness areas within the Lower Cowpasture Project area. Thus, implementing any of the alternatives would not disqualify these areas from inventory and consideration in a future

Old Growth. We also urge the Forest Service to commit to preserving all old growth in the project area, including any old growth identified through field surveys prior to project implementation. Old growth communities “are rare or largely absent” in Southeastern forests, perhaps occupying about one half of one percent (0.5%) of the total forest acreage.³ For that reason, the agency is making efforts to address the restoration of old growth, which is a “missing portion of the southern forest ecosystems.”⁴ If the Forest Service does propose logging old growth, this would be a significant impact, necessitating an environmental impact statement for the project.

We look forward to continuing to participate and providing additional comments as the project moves forward. We hope to have opportunities to discuss the project further with you and your staff during that process. Of course, please let us know if you have questions about these comments.

Sincerely,



Kristin Davis, Senior Attorney
Southern Environmental Law Center
201 West Main Street, Suite 14
Charlottesville, VA 22902-5065
(434) 977-4090
kdavis@selcva.org

Mark Miller, Executive Director
Virginia Wilderness Committee
P.O. Box 1235
Lexington, Virginia 24450
(540) 464-1661
mmiller24450@gmail.com

potential wilderness inventory conducted according to Forest Service Handbook 1909.12, Chapter 70 (effective 1/30/2015).”); North Shenandoah Environmental Assessment (Feb. 2020) at 117 (“It is determined that these actions will not impact the potential for the potential wilderness area or recommended Wilderness Study Area to be considered for future wilderness recommendation per the inventory and evaluation criteria in FSM 1909.15, Chapter 70-Wilderness Evaluation (2015).”

³ USDA-Forest Service, Southern Region, *Guidance for Conserving and Restoring Old-Growth Forest Communities in the Southern Region: Report of the Region 8 Old-Growth Team*, 1 (June 1997).

⁴ *Id.*