

November 5, 2020

Theresa Tanner, District Ranger
James River and Warm Springs Ranger District
Potts Creek Project Scoping Comments
422 Forestry Road
Hot Springs, VA. 24445
<https://cara.ecosystem-management.org/Public/CommentInput?Project=52953>

Dear Ms. Tanner,

The following are my comments on the scoping information provided for the Potts Creek Vegetation Management Project.

I am a regular user of the forest, hiking and camping and visiting project sites, before, during and after the projects are completed. I have been monitoring projects on the ground since 1980 and have provided numerous comments on projects and the last two forest plans while serving for the following organizations: Heartwood, Wild Virginia, Virginia Chapter of the Sierra Club, Virginians for Wilderness and as an individual citizen. These comments represent my personal observations and input for this project.

Lack of Substantial Information on Proposed Action

The Scoping Notice dated October 6, 2020 lacks critical information necessary for citizens to provide informed and substantive comments on the project.

Roads

Road construction and dozer lines create some of the most significant environmental impacts on the forest. Temporary roads create long standing impacts on the forest both during the project and after. Dozer lines also have significant impacts on the forest landscape. Habitat fragmentation, erosion, hydrological changes, habitat destruction, individual species mortality, invasive species proliferation and continued human encroachment are just some of them. The scoping notice notes that approximately nine miles of temporary roads would be created and 10.2 miles of mechanical fuels treatment, 1.7 miles of new dozer line and 4.1 miles of restored dozer line. There is no information provided as to where those roads, lines or treatments are to be located. In a call to Edward Baker on October 29, 2020, I was informed that their location was yet to be determined. Therefore, it is impossible to address the impacts of specific roads on the specific forest resources in these comments. I can only assume that the impacts will be significant.

Please send me information on the location of temporary roads, dozer lines, mechanical treatments and any additional roads analysis as soon as it is available.

Road Closures and Decommissioning

A stated priority of the GWNF is to implement a methodical and system wide analysis of roads and to propose significant road decommissioning and closures as part of project development. There is no information of these in the scoping information. Please send this information as soon as it is available.

Old Growth

The project area contains significant areas of old growth forest as specified by the Virginia Department of Natural Heritage, specifically on the eastern slope of Peters Mountain and in the vicinity of Frozen Knob and Morning Knob. Old growth surveys are critical to assessing the potential impacts of this project on old growth resources. A site visit on November 2, 2020 found evidence of old growth north and west and northeast of FR3020 and above Rt 350 below and around Frozen Knob where logging and burning are planned. Evidence of old growth was also noted below Morning Knob above FR608 and the unidentified roadbed north of FR608 noted on the scoping map. The area there planned for thinning and regeneration logging also show evidence of old growth.

These and any other areas that contain old growth should be excluded from any management for this project and dropped from the project area. Roadbuilding, logging and the impacts of logging equipment on the ground will impact them significantly. True old growth is the rarest forest type in the GWNF and the project area contains portions of the largest block of old growth in the forest. It should be the job of the Forest Service to protect it across the forest, despite what management prescription the forest plan may have placed on it in error.

Potential Old Growth

All of the area above Rt 350 contains significant areas of what I would describe as potential old growth—areas containing trees of age greater than 100 years and where the vegetation is beginning to demonstrate characteristics of old growth. These areas should be maintained as such in this important area of Peters Mountain.

Watershed Information

The Scoping Notice contains no information on watershed resources or conditions in the project area. This would include, but not be limited to, location of seeps, springs and ephemeral streams. This information is critical to creating a project that will not adversely impact these critical hydrologic resources.

The project area on Peters Mountain contains no less than 14 separate stream-level watersheds, all of which have their headwaters in the project area. The area proposed for burning above FR5036 contains (coincidentally) also no less than 14 separate stream-level watersheds, all of which have their headwaters in the project area. This information should be

generated prior to issuance of the scoping notice so that substantive comments can be generated by concerned members of the public.

Potential Wilderness Areas

Most of the project area between R607/Rt 616 and FR5036 contains the Potts Creek Potential Wilderness Area. This area which is adjacent and north of the Barbours Creek Wilderness has been identified by the Forest Service as qualifying for future wilderness designation. Logging below Rt 616 would permanently remove this area from this designation. Management activities including dozer lines, mechanical treatments and burning will compromise the character of the landscape and similarly compromise the character of the landscape and its ability to qualify for wilderness designation. This area should be dropped from the project area.

Invasive Species

Roads, logging, burning and other proposed management activities are vectors for introduction of invasive species to the areas. The impacts of invasives on old growth and potential old growth areas is significant and potentially irreversible. These impacts must be considered and should be eliminated from the project area.

History of forest management, natural disturbances and landscape analysis in the project area

One of the most important pieces of information regarding the project area is the history of past management. Data from these projects including biological inventories, road building and improvements, past logging, past burning, project monitoring and economic data, should be readily available to the public. Including this data with scoping notices would fulfill your responsibility to provide sufficient information for the public to be able to generate responsible and pertinent information on the proposed project.

Information regarding areas which have experienced natural disturbances during the past few decades is also vitally important. FS analysis of early successional habitat (ESH) regularly excludes such information, giving the mistaken illusion that the only impacts to the forest that create ESH are the result of management practices. When natural disturbances, not limited to wind-throw, fire, ice storms, insect predation and slope failures are considered, the project area will be found to contain much more ESH than estimated. Furthermore, as you are required to undertake landscape analysis both within and adjacent to the project area, those areas that are habituated, cleared, developed and managed should be included in any landscape analysis for determination of ESH. It is also of note that there is no credible data to my knowledge that supports any ideology that says there is an optimal % of ESH in the forest. The failure of the Forest Plan to recognize this is a major flaw, given that this is given as justification for the project.

Geologic Resources

Much of the project area is in areas that are considered steep slopes and that have a history of slope failure. My site visit found that virtually all of the project area on Peters Mountain contains numerous areas of boulder fields, skree and talus slopes and other evidence of slope slippage. These areas need to be identified and avoided to minimize impacts in the project area.

Climate Change

All of the proposed management activities, individually and collectively, decrease the ability of the forest to sequester carbon. They, collectively and individually, directly release carbon to the atmosphere. Burning, logging, road building, utilizing fossil fuel burning equipment all contribute to the huge carbon footprint of this proposed project and should be mentioned in scoping and considered in any EA/EIS analysis.

Cumulative Effects

All of the aforementioned issues are intensified in scope in increasing the cumulative effects on the entire forest and GWNF in particular. Cumulative effects analysis is an essential part of the EA/EIS process but should also be considered in the scoping notice for this project.

Conclusions

After considering my comments together, I find that virtually every aspect of the Potts Creek Project problematic and would create unacceptable environmental impacts throughout the project area. While my site specific comments include requests for further information and exclusion of certain areas from the project, when consolidated, the conclusion reached is that this project is ill-conceived and should be dropped.

Please keep me informed of additional data as it becomes available and inform me personally if and when an EA or EIS is available for the project.

Sincerely,

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