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USDA Forest Service

ATTN: Theresa Tanner, District Ranger; Edward Baker, Sara Hivick
James River & 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>
comments-southern-georgewashington-jefferson-warmsprings@fs.fed.us
edward.a.baker@usda.gov, sara.hivick@usda.gov

re: proposed Potts Creek project

Dear Ranger Tanner and Mr. Baker and Ms. Hivick,

Please accept these comments on the proposed Potts Creek project.

"Substantive comments provide factual information, professional opinion, or informed judgment that is relevant to the action being proposed. Substantive comments are specific, comparative, or solution oriented. A substantive comment provides the reasons why and goes beyond just expressing an opinion. While all comments will be considered, substantive comments related to the alternatives are the most useful."

Various forms of subsidized logging are proposed on a total of approximately 2,156 acres in the Potts Creek Project Area. However, "it is estimated that approximately 1,600 acres of harvest would be implemented."

500 acres of intensive even-age "regeneration" logging.

897 acres are to be both logged (down to a residual basal area of 40 sq. ft./acre) and burned.

759 acres of "free thinning" (30-50% of basal area removed).

9 miles of road construction.

Untold miles of skid roads.

Up to 1.7 miles of dozer lines for intentional fires.

Impeding and preventing meaningful public participation

In the past, the multiple pages given by the agency planners to “ecological departure” were unintelligible (see, e.g., North Shenandoah Mountain timber sale project). References to a “natural range of variability” were made, but in the tables under NRV all we had was a single number. A range is just that, some period or distance between an upper and lower bound. How can a range be one number? And the number was a percent; a percent of what?

This proposed project continues this trend. This appears to be more smoke billowing out of some anonymous rear end(s).

I truly did not understand what you were talking about before, and I still don’t — how are these NRV numbers derived, and what is their relevance to this specific proposal? Where were the NRV numbers derived and by whom? What is the site specificity for the NRV numbers in the scoping letter? Were the models actually derived from on-the-ground conditions at this project area? And more importantly, where do the numbers in the tables for current condition come from? Who obtained the data? How? Where on this project area were they obtained?

Please clearly answer these questions.

How do you possibly expect us to intelligently participate in this process when we are being kept in the dark as to your motivations and the information you are supposedly using?

The scoping letter/map don’t disclose the most basic info — such as which numbered stands are where on the map or the sites of roads and dozer lines.

The compartment stands are not numbered on the map, again making comments on specific sites difficult.

Can not see the topo lines on the map (under the colored management units).

The previous logging sites (esh and mid-successional tracts) are not marked on the map. Again making orientation in the field and specific comments more difficult.

The location of “unsuitable” lands are not labeled on the map.

You don’t even tell us the purported ages (as per your inventory) of the “stands” you propose to manage here.

“The prescribed burn units are located in MPA 13, 7E1, 4C1, 4D.” But the map does not delineate these different MPAs. Again, keeping the public in the dark as to THE MOST BASIC INFORMATION pertaining to what you are proposing to do on our public lands.

What exactly is “late open block” logging ? This is a new and vague method the results of which are not clear. Is this even legal; where is it described and analysed in the Forest Plan/FEIS ?

I have noticed this pattern throughout the GWNF (North River and Lee RDs come to mind). It seems that this agency has gone out of its way to stifle information and impede the public’s input into the management of OUR PUBLIC LANDS. This shows contempt for the public.

Need for this project

I totally oppose this tree farming proposal, your proposal to treat forests and their wildlife like shit — and treat the public who unfortunately have to pay your salaries like mushrooms: feed us shit and keep us in the dark.

The need for this project is not established. All we have is vague generic boilerplate language that could be applied anywhere - no site specificity (see above section "Impeding and preventing . . ."). How your purported need was determined at each specific proposed site is not apparent.

This has the appearance of just another make-work project developed by a bloated bureaucracy to waste our money and funnel our precious tax dollars to cronies in the public lands logging and exploiting business.

And you have to keep doing it — pre-commercial thinning, timber stand improvement, commercial thinning, repeated burning, *ad nauseum*. All this adds up to more never-ending tree farming — exactly what this forest doesn't need.

Would this be yet another below-cost timber sale? America is in bad shape economically, and below-cost sales need to cease. Regardless of what some in the FS may think, money doesn't grow on trees.

Disbalanced "age classes"

There is at present an **extreme disbalance** in the distribution of age-class forest acres. In various "project areas" on the Forest here is generally very little or zero acres represented in the 111-120, 121-130, 131-140, 141-150, 151-160, 161-170, 171-180, 181-190, 191-200, 201-210, 211-220, 221-230, 231-240, 241-250, 251-260, 261-270, 271-280, 281-290, 291-300, 301-310, 311-320, 321-330, 331-340, 341-350 years-old age classes (trees of the species found here, such as white, chestnut, and northern red oaks are known to commonly attain such ages, when allowed).

These are important components of forest diversity. It is not reasonable to ignore all these age classes and lump them together (such as 131+ in various FS communiques) when discussing and analyzing "age class distribution" or "balanced age class" and the "need" to cut to attain it.

Implementation of the proposal would result in significant long-term harm to achieving a balance of upper "age classes" here. The result of cumulative impacts to these upper age classes is a significant issue.

This is particularly a bad idea here, since this project area (unlike most on this Forest) actually presents an opportunity to protect and augment older forest.

Roads

One of the worse aspects of this proposal is the idea to construct roads. That the roads are labeled "temporary" does not nullify their harmful affects. The effects from these roads

temporally extend far beyond the time of their use; their ecological effects are not just short-term temporary. And a “closed” road is not the same as no road. Closed roads and temporary roads may result in significant harmful access, hydrologic flow capture and sedimentation, harmful edge effects, and displacement from habitat — in other words reduction in quality and quantity of habitat for various species. All of these direct, indirect, cumulative impacts need a “hard look” by project managers/planners.

The alternatives that must be examined for restoration here include those that 1) build no new roads, 2) effectively close some existing roads, and 3) revegetate some existing roads.

A number of roads in this area have been identified as roads that should potentially be closed due to environmental impacts, costs of upkeep, and other factors. For instance, see the Wild Virginia report on the Forest’s road system (this was previously submitted to the GWNF managers; incorporated by reference).

A roads analysis must be performed for this proposal/project area. This includes the identification of unneeded roads.

The proposed road building and dozer lines would foreseeably facilitate more illegal ATV trespass and its associated harms. This may significantly harm wildlife, aesthetics, ecosystems/communities, recreation, and spiritual values.

Alternatives

The NEPA requires that a reasonable range of alternatives be fully analyzed.

See alternatives in “Roads”, “Old Growth”, “Invasives”, “Wildlife and habitat” sections.

Old Growth and special areas

This forest can “regenerate” without your heavy-handed treatments.

For proof of this, I suggest you look at the tract of old growth that is existent in the project area, right there on Peters Mountain, viz., the Frozen knob “Key Natural Heritage Community”.

It looks as if you are trying to keep this natural forest sequestered (as if it’s somehow an infectious pathogen) and keep it from spreading down the mountain into the lower elevation sites. This is absolutely NOT the way to deal with one of the most significant tracts of old growth in the entire Central Appalachians and a “Key” area.

Don’t you realize the great responsibility you hold in your hands ?

Here is one of the few places on this Forest, in the State, and in the Central Appalachians where the opportunity to augment and promote an already existent block of old growth exists and you not only thumb your nose at this restoration opportunity, but actually propose to impede its areal development and inflict harmful edge effects upon it through logging, roading, or burning (e.g., facilitating alien invasives). This is not consistent with “**DC 4D1-03**: All areas are protected from human-caused detrimental habitat change ...”

Here it is 2020 and the importance and rarity and significance of old-growth forest in the East is simply ignored and swept under the rug. According to the Forest Service's Southern Region guidance on old growth (FR-62), old growth in the eastern U.S. comprises only approximately 0.5% of the old growth that historically existed in the southeastern US. Much of it was cut down in the early part of the 20th century.

There is logging proposed right beside the identified old growth tract. Edge effects are an obvious concern. For instance, the discussion in EAs usually confines the analysis of effects to Ovenbirds nesting habitat just to "the number of acres cut." But this is not sufficient as current scientific knowledge recognizes a potential 600 meter edge effect for bird populations (see Leimgruber *et al. op cit.* and Wilcove, D.S. *et al*, 1986, "Habitat fragmentation in the temperate zone", pp. 237-256 in Soule (ed.) Conservation Biology, Sinauer Press, Sunderland MA; incorporated by reference). This edge effect would extend into the old-growth forest from the roads and cutting sites.

In the past, the inadequacy of the analysis is implied when an EA referred to predation and nesting habitat. As the Ovenbirds would no longer be nesting at the cutover sites, the increased predation would not be occurring there, but would be elsewhere. So, the effects are obviously not confined just to the number of acres cut.

Logging is proposed on two to three sides of old growth tracts identified in the GWNF Plan map "Existing Patches Old Growth Using Region 8 Guidelines" – including the tract east of High Point and immediately south of Rt 617 (even-age logging is proposed on all FS tracts surrounding this old growth tract). Late open block logging is proposed on nearly all FS tracts surrounding the old growth stand due south of Frozen Knob. Even-age logging is proposed on multiple sides around the old growth tract near Rt 3020. And again, because new road locations are not shown, there may be additional impacts from roads.

Also see Fig. C-23 at pg. 213 of the SAA Terrestrial report (incorporated by reference) that shows "forest stands selected as possible old growth" on the James River RD. This information, a study by the Forest Service itself, has been in your hands for almost 25 years now. And it still isn't properly acknowledged, as this proposal makes clear.

I am concerned about harm to tracts of old age dry-mesic Oak and dry & dry-mesic Oak-Pine here. These old age stands and portions of stands should be off-limits to logging and road building and intentional burning (*i.e.*, considered "unsuitable" here). This is another alternative that should be fully developed (and implemented).

See: Fleming, G.P. and W.H. Moorhead III. 2000. Plant communities and ecological land units of the Peters Mountain area, James River Ranger District, George Washington and Jefferson National Forests, Virginia. Natural Heritage Technical Report 00-07, Virginia Dept. of Conservation and Recreation, Division of Natural Heritage, Richmond. Unpublished report submitted to the USDA Forest Service. 195 pp. plus appendices.

You already have this information and it should be considered part of the

administrative record for this project. I incorporate it by reference.

The plots denoted in fig. 21: 20, 22, 23, 50 refer to “unusual old growth communities”; “mesic and submesic” — 46 Old Age talus next to road, 24 Old Growth at high elevation, 2 OG on a ridge crest. These plots are in this project area and may be the locations of proposed actions. If not they are similar too or near locations proposed for “treatment”.

Fig. 12 ‘Approximate extent of old-growth forest in the Peters Mountain study area - Southern Mapping Unit’ - comes down to around 2200’ elevation. This is the Frozen Knob area where fsr #350 is located.

Plant species richness of plots: 9-122, with a mean of 32.6.

Mapping of Landtype Phases (<100 acres) - see Fig. 18. 5.2 CO-SO-heath, 4.3 RO-CO-BB, 5.3 BO-CO DW, U7 unclassified clear-cut regeneration, some 5.4 TmP-Scrub Oak (*Q. ilicifolia*)-heath heath:low bush Blue B (*V. pallidum*) or black huckleberry (*G. baccata*) BB = Black Birch, DW = Dogwood, TmP = Table Mtn. Pine

In Old Growth, there was a mean of 21 old age trees/acre (p. 185 table 76).

An old age stand (at least 150 years old) is surrounded by proposed regeneration logging (and road 617) at the north end of fsr #350. It appears that the FS actually wants to fragment and isolate older age forest and inflict harmful edge effects upon the habitat and populations there. This is a really bad and improper idea that ignores ecological and conservation knowledge and can obviously harm viability and distribution of some species/populations.

Invasive species

“Treatment of non-native invasive plant species . . . in the project would occur as needed”. Of course it will be needed a lot. Just about everything you are proposing to do will facilitate the spread of invasives, i.e., logging, road building, dozer lines, burning. This isn’t a good idea (unless of course it’s ‘job security’ that’s on your mind).

Implementation of this proposal would facilitate more harmful invasives into forest and habitat. This decreases habitat quality and quantity for various taxa, including native plant species.

The FS planners need to fully investigate an alternative(s) that prevents the introduction and spread of invasive species, such as an alternative that identifies and minimizes the pathways by which invasive species are introduced.

Wildlife and habitat

The EA must disclose meaningful documentation and consideration regarding site-specific consideration of specific “Locally Rare” and “Sensitive” species.

Locally Rare species are a significant element of the Forest’s diversity. As they are “Locally Rare” or “Sensitive”, there is an obvious concern for their viability on this Forest. Impacts to Locally Rare and Sensitive species, such as the Cerulean Warbler

and the Coal Skink, are a relevant issue and concern for this proposal; their proper consideration is essential for a well-informed well-reasoned decision. The agency's failure to fully and fairly analyse and disclose the proposal's potential impacts to these species would be a violation of NEPA and the APA. A failure by the agency to fully and fairly consider impacts to these species does not ensure protection of the Forest's diversity and does not ensure these species viability and distribution on the Forest, violations of the NFMA.

It is vital that the locations of TESLR species be identified at the project area, and these locations strictly protected. Because of their rarity TESLR species have limited distributions and cannot be assumed to occur at wherever there is suitable habitat. It is to be expected that a species of concern such as Ginseng or the Coal Skink or Indiana Bat or Cerulean Warbler or Allegheny Woodrat or Pine Snake or Rough-head Shiner or Sword-leafed Phlox or Rock Skullcap or Northeastern Bullrush may survive at only a few, or even a single, site(s) in a relatively large project area. So to maintain their present distribution and viability such sites need to be precisely identified and fully protected. Otherwise the population may be significantly harmed, both directly and indirectly, by the intense disturbance from logging operations.

Implementation of this proposal would negatively impact Black Bears in significant ways, e.g., making for more access and poaching/hunting pressure, reduced habitat security and quality.

Implementation of this proposal would result in more harmful forest perforation and habitat fragmentation. This decreases habitat quality and quantity for various taxa, such as salamanders and herbaceous plants (Rock Skullcap for instance).

I am concerned about significant impacts of project implementation upon sensitive habitats and populations (their viability and distribution), such as seeps, rocky areas/outcrops, ephemeral ponds, steep slopes, mesic drainages, riparian areas, salamanders, Box Turtles, Allegheny Wood Rat, Indiana Bats, Northern Long-eared and Small-footed Bats, TESLR species, Brook Trout, cove hardwood tracts, northern hardwood tracts, and herbaceous understory plants.

Alternatives need to be fully developed that at least avoid direct impacts to these sites and taxa/populations.

I am concerned about the viability and distribution of the Indiana and other rare Bats. Surveys for rare bats need to be done by qualified professionals at the proper times and with the proper methods and equipment. Mere visual diurnal walk-throughs during the course of BE/EA surveys are totally inadequate and improper. These will not result in valid site occurrence data, nor will it ensure that maternal and roosting sites are properly identified and protected and that take will not occur. I can give you contact information for a qualified bat surveyor.

There are many oligotrophic sites here; for example, I've seen them at proposed units at/around roads 608, 350, 350C, and 3020 (no idea what the stand numbers are). These forests sites are already stressed and you propose to cut it down and

haul it away (I guess to Westvaco). Subsidize a foreign corporation with Americans' forests. - They have enough money, they can buy wood from private landowners' who are willing sellers - this money-losing timber sale is not needed.

The trees are small and somewhat contorted. This isn't "saw timber"; it's for pulp or wood pellets for burning. Our National Forests are too important for that.

These sites should be left alone to age and develop through inputs from the fertilizing biomass on site. Removing biomass that would otherwise add valuable nutrients to the sites keeps these places chronically stressed and depauperate. The proposed logging and removal are the last things these places need.

There are many rocky slopes/outcrops here; for example, I've seen them at proposed units at/around roads 608, 350, 350C, and 3020 (no idea what the stand numbers are). These are favorable habitats for salamanders (Plethodontids and Ambystomatids). Leave them alone, these sites should not be burned or logged.

Salamanders and other small, cryptic site-sensitive species are important and significant components of the Forest's diversity. They are as important as any large game species. The agency is required by the NFMA to maintain their distribution and viability just as it is for other large mobile species. Yet there is no MIS present here to use to meaningfully gauge the effect of proposed actions.

The agency must sufficiently examined and considered the potential impacts upon salamanders. This concern is particularly important given the intent to destroy, degrade, or fragment salamander habitat (such as the mature forest and rocky areas), these species low dispersal abilities, and the moister areas (such as in the forest type 53 areas with drainages) targeted for intensive cutting. Populations could be centered, perhaps even be only found at, the particular places targeted for intense manipulation. They have very small home ranges with limited abilities of mobility. They are susceptible and vulnerable to site-specific harm from logging operations and subsequent habitat alteration.

This project analysis fails to consider widely-shared and relevant scientific information that shows that salamanders and their reproductive success may be significantly impacted by logging and roading such as proposed for here. This significant issue of salamander monitoring and viability and scientific information were not reasonably considered by the agency.

This is a particularly salient concern for the very old sites, moister areas, rocky sites, and tracts with LWD cover objects, proposed to be cut here. These sites must be avoided, i.e., be off limits to cutting, burning, and dozer work.

Impacts to site-sensitive creatures such as salamanders must be fully and fairly assessed and disclosed. These creatures are vitally significant components of forest ecosystems.

The proposed logging project may significantly impact (directly, indirectly, and cumulatively) salamander populations in the project area and Forest.

What salamander species are here and what is their distribution. Populations of certain species may be restricted and patchy. The proposed logging has the potential to significantly harm their viability and/or distribution.

Fully and fairly consider widely-shared and relevant scientific information that

shows that salamanders and their reproductive success may be significantly impacted by logging and roading such as proposed for here. This significant issue of salamander monitoring and viability and scientific information must be reasonably considered by the agency. This is a particularly salient concern for the moister areas proposed to be cut here (e.g., in the cutting units with riparian areas, intermittent or ephemeral streams, or springs and seeps).

The present MIS, except for some TES species, are all large mobile vertebrates. The use of these species does not accurately gauge the impacts to small site-sensitive species of low mobility such as salamanders. Management plans must insure research on and (based on continuous monitoring and assessment in the field) evaluation of the effects of each management system to the end that it will not produce substantial and permanent impairment of the productivity of the land. Present MIS (outside of the limited ranges of the Tiger and Cow Knob salamanders) do not allow for the accurate monitoring and assessment of management impacts to salamander populations. Then some other indicator of effects needs to be used; outside of the range of the Cow Knob and Tiger Salamanders, the project's and Plan's MIS are deficient. 16 U.S.C. 1604(g)(3)(C).

It is apparent that the proposed operations have the potential to significantly harm the habitat of and thereby the distribution and viability of some salamander species. This issue must be fully and fairly considered by the agency here.

There are many steep and very steep slopes here; for example, I've seen them at proposed units at/around roads 608, 350, 350C, and 3020 (no idea what the stand numbers are). The scoping letter claims you will "concentrate on areas of less than 35% slope" - That is not good enough. The steep slopes should be AVOIDED. This Forest and its biodiversity are more important than loggers and their bureaucratic enablers. "Upon the physical layout of harvest treatments, sensitive areas, such as riparian corridors and slopes in excess of 35%, would be excluded." Good.

What are the effects on soil build-up and mycorrhizæ of the proposed management activities? What are the impacts on litter detritivores and ground-floor invertebrates and micro-organisms? How is nutrient recycling effected? What are the subsequent cascading ecological impacts (e.g., effects of harvesting methods on ant populations and thus upon insect infestations and grouse populations)?

Climate change must be fully considered in all cumulative effects analyses.

"There is currently very limited acreage within the early or late open forest canopy conditions in the project area."

Of course there is "limited acreage" — this is an unnatural condition for forests here. It is a cultural (*i.e.*, artificial) artifact that occurs as a result of tree farming operations ("In MPA 13, these forest structural conditions can be achieved with the implementation of timber harvesting and/or prescribed fire."). Fabricated by people who treat these lands as their personal playground in which to spend other people's (*i.e.*, American taxpayers) money.

The only “departure” that is evident here is this agency’s from ecological reality.

The reduction of late seral stage habitat is not "short term". The cut-over areas, particularly those subjected to coppice with reserves logging, would not return to late seral stage for at least 80 years. This is not short-term or insignificant.

What site-specific wildlife population data do you have that validate the claimed “need” for these proposed actions to supposedly benefit “early successional bird species” and other taxa ?

“There are approximately 8 acres of existing wildlife openings in the entire project area” — then why isn’t the fabrication of those the focus? “1. Construct approximately 25 acres of permanent wildlife clearings.”

Wildlife biologists have long considered such openings to confer vastly greater benefits to wildlife on a per acre basis than do esh regen from logging (see, e.g., the agency’s own "Wildlife Population Data Working Paper" by Goetz and McEilwane - incorporated by reference); depending on the species, it can be 50 to 1.

Fully develop and consider an alternative that drops all the regeneration logging and just fabricate 35-40 acres of openings. (Westvaco probably wouldn’t like that.)

Mountain Treasures, de facto roadless areas, and Potential Wilderness Areas

Burning much of the Tom’s Knob Mountain Treasure (2740 acres) is proposed. One of my issues is the cumulative impacts to MTs that are *de facto* roadless areas that the FS improperly failed to formally list and designate as “inventoried roadless areas” during the late LRMP revision process. It should be added to the roadless area inventory as part of the decision for this project (this is perfectly legal). It should be an addition to the Barbours Creek Wilderness Area.

The Potts Mountain “road” should be removed from the Forest’s road inventory and designated a trail. The Potts Mountain “road” has been a problem for decades — illegal trespass into Forest lands, including Wilderness and sensitive habitats with rare species.

The intentional human-ignited burning, fabricated fire lines (including with dozers), and “temporary” roads construction are not consistent with Wilderness conditions and should not occur in the Potts Mountain Potential Wilderness Area (PWA). These human impacts could be used subsequently by unscrupulous and dishonest people as a rationale for denying protection to the area (such as Wilderness designation).

This is not the first time this ranger district has manifested utter contempt for this significant Mountain Treasure roadless area. The Toms Branch project proposed over 200 acres of intensive even-age logging in what was then allocated to MA 14 “Remote Habitat for Wildlife”. The planners of that mess failed to obtain

site-specific population monitoring data & inventories, or perform analyses of actual wildlife population data for focal species (see LRMP 3 – 74, FEIS 2 - 34) such as Bears, Worm-eating Warblers, Pileated Woodpeckers, Gray Squirrels, or Ravens that established a "need" for the fabrication of 236 acres of artificial early successional habitat ("esh"), plus other cutting of 32 acres, at this specific site. That failure was not proper then and it is not proper now.

The GWNF planners improperly failed to place the Potts Mountain IRA in a remote backcountry or Wilderness study prescription. And yet the Plan states that "All of the Inventoried Roadless Areas (IRAs) that are not recommended for wilderness study have direction to maintain their roadless character and they will be managed consistent with the requirements of the 2001 Roadless Area Conservation Rule." Implementing the "Mosaics of habitat" prescription does NOT maintain roadless character.

Negative impacts from Deer

What effect this sale will have on the existing Deer herd is an issue here. The effect is well known and obvious. Deer respond positively to actions that fragment forests and fabricate edge. Deer habitat would increase here from the proposed action. The effect on the herd here (not their habitat) must be disclosed. More Deer can be expected to be attracted to the area due to the increase in favorable conditions. With increased habitat and food, ultimately more deer can be expected. But the analysis must disclose the effect on the other flora & fauna FROM the Deer herd and from the fabrication of conditions favorable to increasing their numbers or density here. "[W]hitetailed deer have reached and sustained densities across much of the eastern, northern, and southern United States sufficient to cause manifold and substantial ecological impacts." (see "The white-tailed deer: a keystone herbivore", 1997, D.M. Waller and W.S. Alverson, Wildlife Society Bulletin 25(2): 217-226; incorporated by reference). The deer's deleterious effects upon herbaceous ground flora are well documented. See "Impacts of white-tailed deer on endangered plants", 1992, S.G. Miller, S.P. Bratton, and J. Hadidian, Natural Areas Journal 12:67-74; "Patterns of plant diversity in overbrowsed primary and mature secondary hemlock-northern hardwood forest stands", 1997, T.P. Rooney and W.J. Dress, Journal of the Torrey Botanical Society 124(1):43-51; "Species loss over sixty-six years in the ground-layer vegetation of Heart's Content, an old-growth forest in Pennsylvania, USA", 1997, T.P. Rooney and W.J. Dress, Natural Areas Journal 17(4): 297-305. The effects of the deer herd are not limited to plants; see "Herbivores and the ecology of forest understory birds", 1997, W. McShea in The Science of Overabundance, McShea, Underwood, and Rappole, editors.

Dispersed non-motorized recreation

This area is already degraded for dispersed non-motorized recreation and for visual enjoyment by roads and past cutting. The detrimental cumulative impacts of additional cutting units and roads and dozer lines and burning must not be glossed over. By harmful recreational impacts, I mean, e.g., more noise, increased potential for illegal motorized entry and poaching, diminished naturalness, degraded camping sites, degraded visual quality, impeded hiking, altered wildlife habitat and opportunities for viewing species that are not common like Deer, adverse impacts to desirable herbal plant gathering or photography due to more Deer being attracted to or surviving in the area, loss of mature interior forest conditions which we enjoy and benefit from, damage and destruction of salamander habitat and populations and consequent harm to my/the public viewing of them, harm to TESLR species whose existence is valuable to me and other Americans, and harm to old growth. These can be significant effects (e.g., direct, indirect, or cumulative). The impacts of the proposed logging to visual and dispersed recreational resources and opportunities in the area must receive the requisite “hard look”. This full and fair consideration is essential for a well-informed and well-reasoned decision. Harm to scenic beauty and recreational benefits would result from implementation of this proposed project. From the verbiage in previous EAs, the FS apparently believes that dead or dieing trees (snags and large woody debris significant to forest health) are visually intolerable. But dead standing or wind-thrown trees that may be visible from a road do not harm the “viewshed” or “visual resources”. These are natural elements that add to the visual diversity and quality and overall environment here. The agency must fully analyse these positive aspects.

And the agency somehow fails to understand or admit how visually ugly and degrading logging operations are. Logging does not protect the visual resources in this area. Logging operations are not necessary to improve scenery or the views along roads or trails here. Stumps and slash and run-over soils & vegetation and dozer lines and logging roads and skid roads do not improve the scenic beauty here. They, in fact, harm our use and enjoyment of the area. The FS must fully and fairly consider this.

And there is much more to the “scenic resources” here than just the areas visible to what the agency calls “an average traveler”. The other areas farther from the roads that would be impacted must be meaningfully addressed. This project area is used for dispersed recreation. The negative impacts of your proposal on the “scenic resources” must be fully and fairly considered, and avoided or fully mitigated.

I am particularly concerned about the harm to the Allegheny Trail and the experience when hiking on it from implementation of the proposed actions.

Why are you proposing to route the Trail to a road (road walk) when earlier planning maps showed the Trail routed through the interior of this area on the

mountain crest?

Why is extensive logging proposed in and around the new Trail corridor ?
This logging would not protect the recreational opportunities that otherwise should/ would be provided by the Trail (e.g., aesthetics, interior-forest plant/wildlife viewing opportunities, dispersed/primitive recreation, opportunities to experience solitude, spiritual values).

Basically, the management activities that are favorable and proper in this project area are those that help to revive the beauty and integrity of contiguous wild old-growth forest here in the Appalachians of Virginia.

Thank you for your consideration. Please contact me at the above address if you have questions about or need clarification about any of these comments.

Sincerely,
Steven Krichbaum