

November 11, 2020

George Washington and Jefferson National Forests
Attn: Beth LeMaster
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear Ms. LeMaster:

This document is intended to serve as official comments from The Nature Conservancy regarding the Forest's proposed Oak and Woodland Restoration Project.

Overall, TNC supports the goals of the Project: to increase the representation of oak species and open woodland structure throughout the Forest. Oak species are thought to serve a "keystone" role, enabling greater levels of plant and animal diversity. Likewise, open woodlands are believed to have been a very common feature in the Appalachians, sustaining a different subset of Appalachian diversity than did closed-canopy forest. Indeed, in the 2014 Revised GW Plan, open woodlands should account for the majority of the Forest's oak and pine-dominated acreage. Recent Projects like North Shenandoah have begun to be designed with that fact in mind.

Implementing projects to address these important ecological goals is vital, especially since assessments of the modern forest show that oak species are in decline and open woodland structure is all but absent.

TNC supports the Project's focus on converting white pine plantations, a forest type that exists only due to a legacy of past management decisions. Today, these plantations have little ecological value, and their conversion to oak-dominated woodlands and forest is a benefit for Appalachian biodiversity. TNC also supports the Project's focus on acreage that is essentially already accessible via the Forest's existing road network.

We want to mention several issues that should be given further attention to ensure the Project's success:

- **A working definition of "woodlands".** If the Project is to create woodlands, then a functional description of woodlands needs to be developed. Currently, the woodlands ecological community is only vaguely in the Forest Plans and related documents. As previously mentioned, woodlands often contain an understory consisting of wildflowers

and grasses as well as tree seedlings. Taken together, these features are central to the biodiversity value of woodlands and should be included in the definition.

We recommend that a panel of experts be convened to write such a definition (likely a separate definition for each major ecozone). The definitions would then provide a vision of what “success” looks like and allow managers across the Forest to consistently design projects to achieve that vision.

- **Clear guidance about achieving both major goals.** The Project has two goals: 1) increase oak representation and 2) increase woodland communities. These goals mostly overlap, but not exclusively so; you can increase oak without creating woodlands and you can create woodlands without increasing oak. You can also achieve both goals on the same acreage, but at different points in time.

We recommend that there should be intentional discussion and planning around how, where and when projects will attempt to achieve the goals separately as well as jointly.

- **Fire program planning.** Prescribed burning will be needed in some cases to successfully create oak regeneration and woodland conditions. The GWJEFF fire program already has a sizable portfolio of large-scale burn units.

We recommend that the possible increase in prescribed burning due to this Project should be carefully weighed against the burn program’s existing goals, achievements and capacity.

- **Post-harvesting treatments.** The Notice mentions that additional treatments like chemical release of seedlings could be implemented after harvesting. We believe these treatments are very likely to be necessary, especially in cases where fire is not a feasible tool. Planning for harvests alone, without long-term follow-up, will likely not lead to success.

We recommend that when planning and budgeting for this Project, staff assume that multiple follow-up treatments will be needed to successfully regenerate oak and create woodland communities.

Lastly, we recommend that the agency engage in robust, collaborative discussions with the public, in order to create a clear sense of the agency's vision and its plans for achieving that vision, as well as to create Projects that address public concerns.

We appreciate the opportunity to offer comments about this important project. We look forward to continuing our collaboration in the months ahead.

Blair Smyth
Director, Allegheny Highlands Program
The Nature Conservancy