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June 18, 2021

Dear Mr. Elliott,

This is in response to the scoping letter dated May 17, 2021 seeking comments for the Devils Hens Nest Vegetation Project.

The Clinch Coalition would like the Forest Service to consider the following comments:

1. More detailed project scoping information is needed. The lack of proposed actions in the management prescriptions and units makes it difficult to make meaningful and substantive comments on the project. In recent past, the Forest Service provided proposed acreages within the project area that would get various treatments (e.g. thinning, regeneration, shelterwood, etc.). Also, estimated miles of new and reconstructed roads were not included in the scoping letter.
2. The scoping letter states that "currently, the project area is overrepresented with late-successional closed-canopy conditions due to a lack of disturbance over the previous decades". Some non-old growth prescriptions are adjacent to old growth management prescriptions. With the lack of forest disturbance for decades, there is potential that there may be additional old growth forest in the project area. The Forest Service should conduct old growth surveys as part of the NEPA analysis for this proposal. If additional areas are identified as old growth, they should be added to one of the old growth management prescriptions. Since the acreage of old growth forests is a very small percentage of the GWJNF and because old growth forest is extremely rare across the greater landscape, any "new" old growth forest should be protected. Old growth forests are an important part of our natural heritage, are places very well suited for recreation, but also provide substantial ecological functions such as wildlife habitat and nutrient cycling, but most importantly, because of their great capacity to sequester carbon. There are provisions in the Forest Plan to add areas to old growth management prescriptions. In the event that these provisions do not allow any additions, a Forest Plan Amendment should be done. Also, the current federal government administration has made it clear

that addressing climate change is a priority. The Forest Service should be proactive and get onboard with such efforts as soon as possible.

3. There appears to be potential for Rare Forest Community Types within the project area. Several members of The Clinch Coalition looked at a portion of the project area and observed forest communities with impressive herbaceous diversity and tree species assemblages that likely fit into rare forest community types recognized in the Forest Plan (Basic Mesic Forests ). The Forest Service should have community inventories done and if any Rare Community Types are identified, they should be added to the appropriate Rare Community Management Prescription.
4. The physiography of part of the project area appears to have resulted from a history of landslides. Timber harvesting and road building in these areas may increase the potential for landslides. The Forest Service should do a detailed analysis of the soil types and geology to determine what areas are predisposed to landslides. Such areas should be considered unsuitable for timber harvesting. A landslide occurred in February 2019 in the Cracker Neck area. This further supports the concern for potential landslides.
5. Some roads in the area that may be used as haul routes are steep and poorly maintained (e.g. deep gullies and blown out culverts). Increased runoff due to logging and increased use of these roads from logging trucks is likely to exacerbate the problem accelerating erosion, soil loss and sedimentation. If such roads are put to use, proper road design and maintenance needs to be done to handle their use by heavy logging trucks.
6. Several invasive species such as garlic mustard, stiltgrass, Paulownia, and Ailanthus are present along public roads and Forest roads. Surface disturbance from this project will cause invasive species to spread and displace native species. The Clinch Coalition questions whether the Forest Service has manpower and budget to control invasive plants which can adversely impact assemblages of native plants and ecological functions in the project area.
7. The scoping letter and Forest Plan states that "There is a need to shift the current age class distribution in the project area to increase the amount of early successional forest type and to maintain tree growth and vigor and as a result provide wood products. The Clinch Coalition questions if additional early successional forest is the most appropriate location management of this area. Due to the age and structure of much of the forest in the area, it may be more appropriate to manage it for Old Growth Forest and Rare Forest Community Types.
8. The scoping letter states that "there is a need to maintain and/or improve the current watershed conditions associated with water quality and aquatic habitat." The Clinch Coalition questions how the removal of the forest overstory and the resulting surface disturbance improve watershed conditions?
9. Have surveys for threatened, endangered species, species of concern, locally rare species been done? What species were found and what

mitigation measures will be used to protect them for the project's proposed actions?

10. What mitigation measures will be implemented to protect Riparian Corridors (Management Prescription #11) from logging activities?
11. What mitigation measures will be implemented to protect Priority Watersheds (Clinch River/Stock Creek/Cove Creek (06010205050-P13)) and Federally Listed Endangered and Threatened Mussel and Fish species?
12. In the scoping letter an inactive mining claim was referenced. Should the mining claim become active, are there contingency plans/project modifications to accommodate possible mining activity. Has the holder of the mining claim been contacted to determine what their plans are in the foreseeable future?
13. The following statement is in the scoping letter regarding: "due to a lack of fire disturbance, the current fire regime condition indicator for both watersheds is poor, indicating that there the potential for altered hydrologic and sediment regimes in the project area." This statement is confusing and needs more explanation. Can you please clarify this?
14. The Forest Service should consider 100 meter buffers around all perennial and ephemeral streams, designated old growth forest, rare communities and timber harvesting activities (logging and road construction).
15. The Forest Service should include an emissions inventory that includes the greenhouse gases that would be released to the atmosphere of this project. It should include emissions from all vehicles and equipment that run on fossil fuels, as well as carbon that will be released from the trees themselves after being harvesting. Carbon released from proposed prescribed fire activity should also be included.

The Clinch Coalition respectfully submits these comments and looks forward to working with the Forest Service on this and future projects.

Best regards,



Dave Skinner  
Advisory Board Member  
The Clinch Coalition