

May 27, 2022

*Submitted online via*

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=62011>

Jesse Overcash, Project Leader  
United States Forest Service  
George Washington and Jefferson National Forests  
110 Southpark Drive  
Blacksburg, Virginia 24060

Dear Mr. Overcash:

Thank you for the opportunity to comment on the scoping notice for the proposed White Pine Removal Project on the Eastern Divide Ranger District. We submit these comments on behalf of the Virginia Wilderness Committee and the Southern Environmental Law Center.

Based on information in the scoping notice, the proposed action—converting overstocked white pine plantations to natural stands that contain a species mix more typical for the proposed sites—sounds like the type of work we frequently urge the Forest Service to consider. Specifically, we encourage the Forest Service to focus on ecological restoration and prioritize areas that are the most degraded, including uncharacteristic forest such as pine plantations. This is also where the greatest level of agreement and support for management is likely. Accordingly, we are glad to learn about this project. We highlight the following issues and concerns for the District’s consideration as it prepares an environmental assessment and further develops the Project.

***Management Prescription 9A1.*** The District is proposing 25 harvest units totaling 881 acres of logging—including 138 acres of regeneration—in Management Prescription 9A1, Source Water Protection Watersheds,<sup>1</sup> which in this case protects the drinking water supply for the town of Pulaski. The Forest Plan specifies that “[t]he emphasis of this prescription is to provide clean drinking water by maintain healthy watersheds containing healthy forests.”<sup>2</sup> Consequently, “[f]orest management activities within these areas are focused on protecting drinking water sources while maintaining healthy and vigorous forests that are less susceptible to large scale insect and/or disease episodes,” and vegetation management is characterized by a “low intensity” approach,” with “the higher priority” being “protecting drinking water.”<sup>3</sup>

Management in 9A1 areas should not be undertaken lightly. Here, absent site-specific concerns about resource conditions disclosed during the NEPA process, we believe the proposed management to convert uncharacteristic pine plantations to native forest communities would constitute ecological restoration and could support healthy and vigorous forests. That does not

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<sup>1</sup> See App. A to Scoping Notice.

<sup>2</sup> JNF Forest Plan at 3-151.

<sup>3</sup> *Id.* at 3-151 to 3-152.

mean such management is categorically without risk. Indeed, management in these areas should be approached carefully, with an eye towards minimizing disturbance and, especially, erosion and sedimentation impacts. Additionally, the District should be cautious about roadbuilding associated with the proposed management. And given the focus in 9A1 areas on protecting drinking water, we believe the Forest Service should consider an alternative that avoids logging on steep slopes and avoids the use of herbicides in these areas. The latter would necessitate that the District develop and commit to adequate measures to address non-native invasive species (NNIS) in these areas. Further, we note two Forest Plan standards that the District should evaluate to ensure the Project complies:

- 9A1-007. This standard provides that “[u]p to 4% of the acres can be in early successional habitat in patches of 2 to 20 acres clustered on the landscape.”<sup>4</sup> Appendix A to the scoping notice indicates that three of the four regeneration units proposed in 9A1 exceed 20 acres in size.<sup>5</sup> The District must ensure that regeneration harvest does not exceed the patch size allowable under the Forest Plan.
- 9A1-021. This standard provides that “[r]oad construction or reconstruction is informed by a watershed-scale road analysis. If the District proposes any road construction or reconstruction in 9A1, including temporary road construction, it should conduct a watershed-scale road analysis.

***Inventoried Roadless Area (IRA).*** Based on our GIS review of the Project shapefiles, it appears one of the proposed units—Compartment 6067, Stand 5—overlays the Long Spur IRA. We ask that the District confirm whether this unit in fact overlays an IRA and drop the unit if it does. GIS also indicates that several units abut the Little Walker Mountain IRA. We ask the District to confirm that these units do not overlay the IRA and drop them or modify them if they do.

***Old Growth.*** We urge the District to commit that it will not log any existing old growth as part of this project. Given the rarity and importance of old growth forest in the Southern Appalachians, we firmly believe that any existing old growth should be protected and that logging any existing old growth would be very difficult to justify, especially without an environmental impact statement.<sup>6</sup> Additionally, based on our GIS review of the Project shapefiles, it appears two of the proposed units—Compartment 6087, Stand 8 and Compartment 6086, Stand 1—overlap Management Prescription 6C, Old Growth Forest Communities Associated With Disturbance. We ask that the District confirm whether this is correct, and adjust the Project accordingly.

***Regeneration Harvest.*** Similar to the harvest units in 9A1, it appears the other proposed regeneration harvest units also are larger the Forest Plan allows. Plan Standards 8A1-010 and 8E1-018 provide that regeneration units range from 2 to 40 acres and 5 to 20 acres, respectively.

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<sup>4</sup> *Id.* at 3-153.

<sup>5</sup> Those units are 6084/3, 6084/16, and 6084/23.

<sup>6</sup> Old growth forest holds biological, wildlife, recreational, research, scientific, educational, cultural, aesthetic, and spiritual values. *See* Region 8 Guidance at 12-14. Old growth forest takes centuries to develop, so it is irreplaceable on a human time scale if it is replaceable at all. *See Neighbors of Cuddy Mountain v. U.S. Forest Service*, 137 F.3d 1372, 1382 (9<sup>th</sup> Cir. 1998); *Idaho Sporting Congress v. Alexander*, 222 F.3d 562 (9<sup>th</sup> Cir. 2000).

Appendix A to the scoping notice indicates that one of the proposed regeneration units in 8A1<sup>7</sup> and all the proposed regeneration units in 8E1 exceed the maximum patch size for these management prescriptions.

**Road Construction.** We appreciate that most of the harvest units are on, or very near, existing system roads. Where the scoping notice proposes harvest in stands that will require temporary road construction for access, we encourage the District to consider dropping those units. Our GIS review reveals several units that appear particularly far from existing roads relative to the rest of the units proposed here.<sup>8</sup>

**Non-Native Invasive Species.** . Before management activities take place, it is important for the District to identify potential NNIS threats and develop a control/eradication plan that includes follow-up monitoring of any NNIS treatments for effectiveness and commits to funding this NNIS treatment. And if the District determines that NNIS control/eradication is unlikely to succeed in a specific area, we urge the District not to propose management there until those threats can be addressed adequately.

Thank you for considering these comments. We look forward to learning more about this project as planning proceeds.

Sincerely,



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<sup>7</sup> Compartment 6092, Stand 1.

<sup>8</sup> For example, Compartment 6084, Stands 7, 16 and 27.