



November 7, 2022

Andy Moore  
Acting Deputy District Ranger, North River Ranger District  
George Washington National Forest  
401 Oakwood Drive  
Harrisonburg, VA 28801

Re: Archer Knob Project Draft Environmental Assessment

Dear Mr. Moore,

On behalf of the Congressional Sportsmen's Foundation (CSF), and as a sportsman that recreates on the George Washington National Forest (GWNF), please accept the following comments on the draft environmental assessment for the Archer Knob Project (Project).

Founded in 1989, CSF is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus, the Governors Sportsmen's Caucus, and the National Assembly of Sportsmen's Caucuses, CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

Overall, we support the intent of the Project to improve forest health and wildlife habitat and support most of the proposed activities, including the restoration of aquatic organism passages, the improvements to the Hite Hollow Rifle Range, and particularly the proposed vegetation treatments that would create more regenerating young forests, open woodlands, and wildlife openings, to support an array of game and nongame wildlife species, many of which are identified as Species of Greatest Conservation Need in Virginia's Wildlife Action Plan, that depend on early seral and other diverse habitats.

Specifically, we support the following proposed activities:

- 2,142 acres of regeneration harvests to create early successional and young forest habitat;
- 2,610 acres of thinning to create open woodlands;

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- 766 acres of forest stand improvement to encourage the growth of species, especially oaks and hickories, beneficial to wildlife;
- Rehabilitation of 79 acres of existing permanent wildlife openings to create early seral grassland/forb habitat;
- 44 acres of feathering to maintain/expand wildlife openings;
- Prescribed burning;
- Tree planting in regeneration harvest sites and wildlife openings;
- Revegetating 41 acres of landings to provide forage for wildlife;
- Enhancing habitat on 79 acres of linear wildlife openings;
- Restoration of 10 aquatic organism passages;
- 39 miles of road maintenance and one mile of road reconstruction;
- Hite Hollow Rifle Range erosion control and target area widening; and
- Non-native invasive plant control.

The above proposed activities would help the GWNF make progress towards creating the desired conditions, namely the early successional habitat goals in Management Area 13, set forth in its 2014 Revised Land and Resource Management Plan. Currently, less than 1% of the GWNF is comprised of early successional habitat, and this serious lack of early successional habitat contributes to the decline of a suite of wildlife species, game and nongame, that need regenerating forests and early seral habitats for food and cover during important life stages. The analysis area for the Project is no exception, despite comments to the contrary regarding the availability of early successional habitat on nearby private lands which do not take into account the quality of that habitat (and lack of public access).

As sportsmen and women, we support the proposed timber harvests and wildlife habitat improvements to support black bear, ruffed grouse, American woodcock, wild turkey, and white-tailed deer, among others. To single out a bellwether species for habitat, the ruffed grouse population on the GWNF has been declining for decades primarily because of the loss of regenerating young forests caused by the significantly reduced timber harvesting levels. With more than 75% of the Project area comprised of stands over 80 years old that do not support a vibrant understory beneficial to wildlife, we encourage you to move forward with the Project to correct the age class distribution imbalance and improve habitat diversity to support Virginia's wildlife species that rely on regenerating young forests and other early habitats.

Additionally, we oppose the proposal to decommission 4.81 miles of Forest Service Roads. Roads provide important access for sportsmen and women, and, in addition to serving as linear wildlife openings, road are important to maintain for forest management capabilities. The environmental assessment noted that the roads are open seasonally and stated, "these roads are currently mostly stable, not actively eroding." In the absence of a significant documented threat

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to water quality, we encourage the Forest Service to maintain and/or rehabilitate these roads in lieu of decommissioning them.

CSF represents the interests of Virginia's sportsmen and women, the primary funders of state-based conservation efforts and significant contributors to Virginia's economy, that depend on access to the George Washington National Forest to pursue their outdoor pastimes. Virginia's sportsmen and women have a more than \$3.6 billion impact on the Commonwealth's economy, and in 2020 alone, Virginia's sportsmen and women generated more than \$63.66 million for conservation funding through the "user pays – public benefits" American System of Conservation Funding. Virginia's hunters and trappers also contribute significantly to conservation work on U.S. Forest Service lands through the purchase of annual National Forest Permits.

The GWNF has a storied outdoor sporting legacy, and we appreciate your consideration of the importance of supporting Virginia's sporting traditions through the proposed activities in the Archer Knob Project that would improve access for hunters and anglers and improve fish and wildlife habitat.

Sincerely,

A handwritten signature in black ink, appearing to read "JWC", with a long, sweeping horizontal stroke extending to the right.

John Culclasure  
Director of Forest Policy  
Congressional Sportsmen's Foundation  
[jculclasure@congressionalsportsmen.org](mailto:jculclasure@congressionalsportsmen.org)

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