

May 11, 2023

Submitted online via

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

Beth Christensen, District Ranger
Jesse Overcash, Project Leader
George Washington and Jefferson National Forests
110 Southpark Drive
Blacksburg, Virginia 24060

Re: White Pine Removal project

Dear Ms. Christensen and Mr. Overcash:

Thank you for the opportunity to comment on the draft EA 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.

As you know, we encourage the Forest Service to focus management on ecological restoration and prioritize areas that are the most degraded, including uncharacteristic forest such as pine plantations. This can include projects like this one, which proposes to convert overstocked white pine plantations to natural stands that contain a species mix that is more typical for the proposed sites.

Thank you also for making modifications to the project that address some of our May 2022 scoping comments, including an assurance that no old growth forest will be logged. We now offer a few more comments below for your consideration.

Herbicides in 9A1 areas. We urge the District to select Alternative 2, which would avoid the use of herbicides within 9A1 Source Water Protection Watershed areas. By using prescribed fire and mechanical release instead of herbicides, the District can promote regeneration to a more natural mix of tree species and attempt NNIS control without risking contamination of the drinking water supply for the town of Pulaski. Avoiding this risk aligns with the highest priority of the Forest Plan for these areas – drinking water protection. As you know, the Plan provides that:

- the emphasis of this management prescription is to provide clean drinking water;
- any forest management activities within these areas must be focused on protecting drinking water sources; and
- “protecting drinking water” is a higher priority than any low intensity vegetation management occurring in the area.¹

Given the clear priority of drinking water protection in these areas, why would the District needlessly risk contaminating that water with herbicides when safer methods are available? Doing so would run contrary to Forest Plan direction, as well as be an arbitrary and capricious decision.

¹ Jefferson Forest Plan at 3-151 to 3-152.

Moreover, the Draft EA does not adequately analyze the specific 9A1 sites where herbicides are proposed for use. Once the herbicides to be used in these areas (glyphosate and glyphosate with triclopyr) enter the environment, their movements and the likelihood of reaching nearby drinking water sources depend heavily on site-specific factors such as the degree to which they are bound to soil particles, the mechanisms by which they may be re-solubilized after binding has occurred, and slope. Accordingly, to understand the risks to Pulaski's drinking water source, the District should analyze the ways in which the herbicides and the particular formulations of herbicides and adjuvants will act when they come in contact with the soils actually present in the 9A1 areas. The Draft EA does not include such a discussion.

For these reasons, we urge the District to select Alternative 2 and avoid the use of herbicides within 9A1 areas where drinking water protection is the highest priority.

Inventoried roadless areas (IRAs). Based on our GIS review of the project shapefiles, it still appears that some of proposed units extend into IRAs. These include (but may not be limited to): Big Walker Tunnel unit 5 within the Long Spur IRA and Gatewood/Caseknife unit 3 within the Little Walker Mountain IRA. Is this correct? If management is indeed proposed in IRAs, the District must consider each area's distinguishing characteristics and attributes, as well evaluate the impact of development on those values or modify the project to avoid IRAs. The Draft EA does not do this.

Thank you for considering these comments. We look forward to following the progress of this project as planning and implementation proceeds.

Sincerely,



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