

August 1, 2024

Via online submission at <https://cara.fs2c.usda.gov/Public/ReadingRoom?Project=66431>

Lauren Stull, District Ranger
George Washington and Jefferson National Forests
Glewood-Pedlar Ranger District
27 Ranger Lane
Natural Bridge Station, VA 24579

Re: Scoping comments on the Jennings Creek Watershed project

Dear Lauren,

We appreciate the opportunity to comment on the Jennings Creek Watershed Project. Please accept these comments on behalf of the Southern Environmental Law Center and the Virginia Wilderness Committee. We look forward to following this project and will provide additional comments as we learn more. In the meantime, we offer the following brief comments:

At the outset, we would like to acknowledge the useful project information that you provide in the scoping notice. Your maps are legible, and at a scale that gave us a sense of where each type of proposed management is located. Your description of the general condition and ecological needs of the project area, the various management prescriptions areas (MPA), and age classes within each MPA help us understand your goals for this project. The information you provide about anticipated actions, including types of management, silvicultural methods, and locations of proposed actions at the stand level, is especially useful. Scoping notices need to provide this information for the public to have a sense of the project and the ability to prepare meaningful comments, and we appreciate you doing so.

Additionally, we are pleased to see that this is a multi-resource project that includes proposed activities related to recreation and trails, road system changes, and non-commercial forest stand improvements.

1. Old Growth

Based on the stand ages listed in Table 4 of the scoping notice, it seems that some of the proposed units, or portions of them, may contain existing old growth forest. We urge you to commit to not logging 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

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difficult to justify, especially without an environmental impact statement.¹ Additionally, a few of the older stands in Table 4 appear to be Old Growth Forest Types 5- Mixed Mesophytic Forest, in which logging old growth is prohibited. We look forward to learning more about existing old growth in the proposed units as you complete your old growth surveys.

2. Scenic impacts

It looks like the proposed prescribed fire units will cross the Appalachian Trail for a few miles. We urge you to minimize any scenic impacts from the trail and consider any work that will be necessary to rehab the trail post-burn. We look forward to reviewing your analysis of the scenic impacts from the proposed burning and logging.

Thank you again for the opportunity to comment. We would be pleased to discuss these comments and look forward to being involved with this project as it moves forward.

Sincerely,



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cc: Nick Redifer, Project Leader (via email, Nicholas.redifer@usda.gov)

¹ 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 (9th Cir. 1998); *Idaho Sporting Congress v. Alexander*, 222 F.3d 562 (9th Cir. 2000).