



August 16, 2024

USDA Forest Service
ATTN: Gregg Slezak, Deputy District Ranger
401 Oakwood Drive
Harrisonburg, VA 22801

Re: Comments on Mad Lick Resiliency and Restoration Project

Dear Deputy Ranger Slezak:

On behalf of Potomac Appalachian Trail Club (PATC), I want to thank you for the opportunity to comment on the Mad Lick Project. PATC is a volunteer trail organization of over 8,000 members, formed in 1927, to protect the lands encompassing the Appalachian Trail and the surrounding Mid-Atlantic region. Through conservation and land management, education and outreach programs, and volunteer efforts, we strive to maintain the integrity of outdoor spaces for future generations to enjoy. PATC has a group volunteer agreement with the North River and Lee Districts to maintain trails in the North Zone. PATC North River District volunteers maintain several trails in the project area and are very familiar with the natural and recreational resources.

The Mad Lick Project, as described in the scoping notice, is rather vague. We look forward to seeing a more detailed project description when the Environmental Assessment (EA) is done. We may have additional comments at that time. Following are some constructive suggestions for your consideration as you continue to flesh out the details of the project.

Need for more detailed maps.

Please consider adding the network of trails and forest roads to the maps so that we can see how the proposed activities relate to recreational resources. If you are unable to add roads and trails, would you please send me GIS shape files for the project.

Intrusion into Shenandoah Mountain National Scenic Area (SMNSA).

The Mad Lick Project is partially within the SMNSA boundaries as shown on the official map for the Shenandoah Mountain Act (introduced in the U.S. Senate in 2023 and now included in the 2024 Senate Farm Bill). PATC is one of over 400 organizations and businesses that endorsed the SMNSA. Please pull the Project boundary back to avoid a conflict with management of the SMNSA.

Recreational resources

Most of the management activities you have proposed are in areas that are designated as suitable for timber management in the GWNF Plan. In choosing regeneration sites, we ask that you avoid cutting timber in the following areas that have strong recreational and scenic characteristics:

- **Braley Pond Day Use Area.**
 - Please avoid logging the area around Braley Pond. This is a heavily-visited and often-photographed area, and it is important to preserve its scenic qualities and biodiversity that naturalists, fishermen, hikers, and other visitors enjoy.
 - The 3-mile loop composed of Bald Ridge Trail and Johnson Draft Trail is the most popular short, easy loop in the North River Ranger District. It has a nice mix of mature forest and open meadows. Please preserve the scenic quality of these trails and their viewsheds. If the FS were to harvest the timber adjacent to trails on this loop, it would diminish the trail experience and allow light-loving invasives to spread into previously healthy and shady forest.
- **Wild Oak National Recreation Trail (WOT).** This popular 26-mile loop is used by hikers, mountain bikers, and equestrians. Please be sensitive to preserving the scenic qualities on segments of the WOT in the project area (on both sides of Barley Pond Rd - Dividing Ridge and Hankey Mountain)
- **Mile-a-Minute (MaM) Area on Hankey Mountain.** Volunteers from PATC and several other organizations have spent two years, in collaboration with the Forest Service, trying to control a multi-acre patch of MaM near the summit of Hankey Mountain. Since MaM readily spreads into nearby clearings, we ask that you not harvest timber or do thinning adjacent to the MaM patch. Our experience show that MaM is almost impossible to control once it gets established. It is better to discourage spreading to new areas by preserving shade around known MaM patches.

Prescribed burning

We are concerned about the northwest boundary of the White Oak Run prescribed burn shown on the map. The fire line on the southwest side would be at the base of a very steep slope leading up to Big Bald Knob in Ramseys Draft Wilderness. If weather conditions are not ideal, this fire could spread up the mountain. It appears the fire line at the base of the mountain would be only 600-800' from the boundary of the proposed Ramseys Draft Wilderness Addition. Could you adjust the burn boundary to ensure it doesn't spread up the mountain and put hikers and backpackers on the Big Bald section of Wild Oak Trail at risk. Please include the purpose and specific goals of burning in this area in the Environmental Assessment. Please consider the impact of burning this area on salamanders and other species that depend on leaf litter, cover and shade.

Sustainable Trail opportunities

We are pleased that the Mad Lick Project includes some sustainable trail work. We have some suggestions for you to consider:

- **Braley Pond 3-mile loop.** During the 2-year North Zone Recreation Strategy process, we reported several sections of Bald Ridge and Johnson's Draft Trails where the steam runs

down the trail. PATC maintains this loop, but we have not found a solution that can be accomplished with hand tools. Machine work may be needed to increase sustainability and protect water quality in Johnson Draft and Braley Branch.

- **Dividing Ridge Trail (section of WOT).** The lower half of Dividing Ridge Trail was originally a road. It has numerous grade dips that have filled in over many decades and that are no longer effective. These dozer-built grade dips are heavily compacted. Would it be possible to use lightweight equipment to clean out some of these grade dips to make the trail more sustainable? We will continue hand digging grade dips on the upper portion of Dividing Ridge.
- **White Oak Draft Trail.** The first .3 mile of trail runs up a tributary to White Oak Draft. The trail requires rock-hopping and crossing back and forth over the channel. We suggest rerouting the trail out of the stream to protect stream quality and increase sustainability.

Invasives (NNIS)

Logging with its soil disturbance and canopy removal (hence increased light) creates a large disturbance and has the potential to increase the spread of NNIS. We have seen that the FS does not have the budget to control the spread of Mile-a-Minute and Wavyleaf basket grass, both high priority NNIS. Introduction of invasives, even if unintentional, makes a permanent change to the forest. This is especially tragic when it happens to a forest that was previously healthy and free of invasives. When heavy equipment enters an area, it is almost guaranteed to spread invasives that may be growing along roads. Cleaning the equipment beforehand is a good practice, but that still doesn't stop the spread. We have seen invasives spread on Narrowback Mountain where thinning and cutting have been done in the Dog Graveyard area. The managed areas now have a dense thicket of Japanese stiltgrass and other NNIS. When a forest is degraded by NNIS, it diminishes biodiversity, scenic values, and enjoyment of outdoor recreation by visitors.

We ask you to consider three suggestions regarding spread of NNIS:

- **Regeneration and thinning sites.** Please choose regeneration sites where invasives already have a foothold, and avoid cutting in new areas that are still free of NNIS.
- **MaM Patch on Hankey.** Please plan to incorporate ongoing annual preemergent treatments for the MaM patch on Hankey Mountain, as needed, and for new patches of MaM found while this project is being implemented. The Hankey Mountain patch is on the upper edge of the project and may have already spread into the project area. It would be a shame for the buoyant seeds of this fast-growing "Kudzu of the North" to spread down Stoutemeyer Run to the Middle River and beyond.
- **Braley Pond 3-mile Loop clearings** Please include treating Autumn olive and Multiflora rose in wildlife meadows and along the trail.

Water quality

This large project has proposed activities that involve chemical treatments over large tracts of forest in the headwaters of some important rivers and streams. We encourage you to avoid spraying chemicals too close to 1) the North River, which provides water for Staunton and other communities and towns downstream and 2) the native trout streams found in the project area. In

addition to the needs of municipalities and aquatic life for clean water, trail users drink water from these streams.

Special species

We know of several special or locally rare species that are found in the project area. We suggest you do a biological assessment to determine if there are others. Please consider the habitat needs of each of these as you further develop the project. We can supply exact locations for the following upon request.

- **Spotted Salamander.** Spotted salamanders breed in a small wildlife pond on Johnson Draft Trail but spend the rest of their year burrowed down in the leaf litter in the surrounding closed canopy forest. Please avoid management activities that would degrade habitat for Spotted salamanders.
- **Northern Metalmark butterfly.** This rare butterfly is found in the project area. Please do not degrade habitat for this rare butterfly species.
- **Coal Skink.** This rare species has been found in the Chestnut Oak Knob area. Please consult a biologist who can determine what management activities may harm the Coal skink.
- **Yellow lady's slipper.** A large patch of yellow lady's slippers is found in the project area. This is a rare occurrence in the Shenandoah Mountain area.
- **Large whorled pogonia.** This delicate beauty, found on Dividing Ridge, is a rare occurrence in the Shenandoah Mountain area.

We appreciate the opportunity to read the scoping notice and offer these comments.

Sincerely,



Jim Fetig, President

Potomac Appalachian Trail Club

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Cc: Rush Williamson, PATC Supervisor of Trails
Heidi Forrest, PATC Trails Coordinator
Lynn and Malcolm Cameron, PATC North River District Managers