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Organization: Wild Virginia

Title: Conservation Director

Comments: Dear Ranger Yonce:

I submit these comments on behalf of Wild Virginia and our members, in response to the notice of an additional comment period published September 25, 2019 (notice) in the Daily Record of Harrisonburg. Wild Virginia has been involved in this project from the start and submitted the scoping comments dated November 6, 2017 which are attached to this submittal and which we incorporate as part of these comments. We believe that some of the concerns we expressed at the scoping stage have yet to be addressed in a satisfactory manner.

We do appreciate that the Forest Service (FS) has made the Draft Environmental Assessment (DEA) available for comment before issuing a Decision Document. We believe this practice is appropriate and should be followed in all cases.

We endorse the comments on the DEA that the Southern Environmental Law Center (SELC) submitted on September 16, 2019. In particular, the discussion of endangered, sensitive, and locally rare species reveals significant deficiencies in the DEA. We believe that if those deficiencies are not remedied in a final EA, the decision will not live up to legal standards the FS is bound to meet. We also echo the expression of appreciation in the SELC comments of plans to improve connectivity in streams by replacing culverts through this project.

In our scoping comments, we stated that we believed the choice to segregate an analysis of recreation issues from the other issues included in the DEA is inappropriate. The FS has acknowledged that unplanned trails and camping areas in the Slate Lick area are significant threats to water quality and native species. The DEA states that a full review of recreation was not conducted alongside the other management activities, in part, due to the fact that "stakeholder discussions became more contentious in nature and there was an inability to reach a consensus proposal." DEA at 58. The fact that there are divergent views amongst stakeholders does not justify the refusal to address these issues in a full and adequate manner and in the context of this landscape-scale project review. There is no question that impacted caused by those management activities discussed in the DEA may combine with those caused by the recreational facilities and activities the FS has chosen to exclude from this review. The National Environmental Policy Act requires that cumulative impacts be analyzed and we believe the FS has failed to meet this requirement in the DEA.

Under the heading "Resources or Uses Not Present, Outside Scope of Analysis, or Not Affected," the DEA states: "Climate change was identified as a project issue. This analysis will tier to the Forest level briefing paper that addresses project level climate change and carbon sequestration concerns." DEA at 70. The fact that a forest-wide planning process has been conducted on an issue, in this case climate change, does not justify the FS in failing to include any discussion of that same issue in a project-level EA. Some discussion of this project's consistency with that broader plan and of any new factors or information that has become available since that forest-wide review was completed is vital to understand this project's relation to climate change.

Thank you for the opportunity to comment and for the efforts of FS staff on this project.

Sincerely,

David Sligh

Conservation Director