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Organization: The Nature Conservancy

Title:

Comments: Dear Ms. Yonce,

The George Washington National Forest (GWNF) Stakeholder Collaborative strives to be a consistent, effective, and valued partner that helps the Forest accomplish results more efficiently and with broader public support. To that end, I am pleased to submit our comments on the North Shenandoah Mountain Restoration Project (NSM) per your draft EA dated August 25, 2019.

Collaborative development of landscape-scale, multi-resource projects

We applaud the collaborative process that has shaped the project thus far and appreciate the opportunity for the Forest and stakeholders to build on the successful model started with the Lower Cowpasture project. As you know, the Stakeholders group has been involved in the development of the NSM project since its inception in early 2015 and submitted comments in response to the scoping notice in November of 2017. We continue to believe this type of collaborative, balanced, multi-resource implementation of the Forest Plan, is especially valuable because it also allows various Forest users to come together and support both increased management and increased protection.

In general, we are supportive of the overall scope of work proposed in this EA. We appreciate how the EA lays out GW Plan goals and generally explains how each proposed action is designed to help accomplish desired conditions, such as achieving ecosystem restoration goals, increasing diversity, and maintaining healthy forests and watersheds. We understand that using active management, like prescribed fire and timber harvest, is an important way to increase the [ldquo]early[rdquo] and [ldquo]open[rdquo] conditions that are part of a resilient, healthy forest.

As we have expressed before, we would like to see a mosaic of unfragmented, undeveloped forest core areas within a diverse landscape of actively managed areas, to provide a natural range of native forest species, age, and canopy conditions [ndash] throughout the GWNF. We think this is critical to achieving thriving, resilient, and well-connected forest ecosystems that support healthy wildlife populations and provide important ecological, social, recreation, and economic benefits for people[mdash]now and into a changing future.

Related to recreation, while the North Shenandoah Restoration project was originally developed as a single-EA, landscape-scale project, the recreation component of the project was removed and is going to occur as a separate EA. The GWNF stakeholder collaborative would still like to advocate for recreation on the national forest, and to increase dispersed recreation planning across the district.

Vegetation Management

Overall, we are pleased with the vegetation management in the project. Clustering proposed vegetation management units in the same area may help [ldquo]move the needle[rdquo] and achieve Plan Ecosystem Diversity goals at a watershed scale. We are also excited about the amount of shortleaf pine restoration and encourage the forest to continue this work.

We appreciate the Forest looking into rehabbing existing wildlife openings and being selective about where to create new ones.

RX Fire

Overall, we are pleased with the prescribed fire that is planned in the North Shenandoah Restoration Project. However, we would like to learn more about what Plan goals are you attempting to achieve using prescribed fire, for example, are you trying to achieve more [ldquo]early[rdquo] or [ldquo]open[rdquo]? With most of the other types of treatments described in the EA, there is a clear goal of achieving a part of the GW Plan goals. Are there ways to integrate timber and prescribed fire to be more effective at targeting open woodlands?

Lastly, in other projects, we have seen that prescribed fire can have a negative impact on trails, especially if the fire is allowed to burn across the trail. This causes a large amount of undergrowth to grow on the trail corridor, as well as causes trees to fall across the trail. With the limited recreation budget for trail work, most of this work then has to be done by volunteers. Using a trail as a fire line can minimize the impacts, but if trails will be burned across, please consider more work post-burn to maintain the trail corridor.

#### Monitoring

We would ask that the Forest maintain the amount of public engagement as this project is implemented, with annual field trips and monitoring reports to the public. We encourage the Forest to review monitoring results and modify future activities if needed as part of the Adaptive Management cycle.

#### NNIS

We would also ask to strengthen the NNIS program with assessment and management of NNIS before any treatments take place. Often, active management can cause NNIS to spread, and we would encourage that time is spent to manage existing NNIS in an area before any management activity is started. One example discussed in earlier meetings was the mile-a-minute infestation in the Slate Lick Working Area. It still seems like acreage with existing mile-a-minute populations is targeted for silvicultural activities. We encourage the Forest to carefully consider how to control this particular invasive species before any planned disturbance occurs.

#### Transportation

Lastly, we are curious if the Forest has considered other options for Forest Road 547. Is it possible to mitigate the sediment concerns to the adjacent native trout stream without total closure, perhaps with seasonal usage restrictions and/or leaving open a portion of the road?

We appreciate both the opportunity to offer comments on this project and the collaborative nature in which it has been created. We appreciate your consideration of these comments and look forward to working together on the next stage of the project. If you have any questions please don[rsquo]t hesitate to contact me.

Signed by:

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