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Comments: Comments on Eastern Divide Insect and Disease Project Phase II

I am a resident of the Dismal Creek Watershed and have been involved in commenting on USFS projects over the past thirty years. As I have made clear throughout the evolution of this project, I continue to oppose its implementation. While I applaud the agency for choosing to conduct an Environmental Assessment rather than move forward with this project under a Categorical Exclusion under the Healthy Forest restoration Act, unfortunately this analysis falls significantly short in a number of areas.

Purpose and Need

The ostensible purpose for this project, "to promote oak regeneration and improve resiliency from stands affected by past and anticipated future defoliation from the gypsy moth through the use of timber harvest," is misguided at best, disingenuous at least. As I provided in documents at one of the public meetings on this project, analysis undertaken by the Virginia Department of Forestry (VDOF) demonstrated that there was no infestation of gypsy moth in the Dismal Creek Watershed as late as 2017 (map images attached). I notice a conflation of the Dismal Creek and Nobusiness watersheds in several areas in your EA, which conveniently lumps together two distinct watersheds with vastly different histories of moth infestation. And, as I also noted at the public meetings, in my travels around Dismal, I have observed no caterpillar defoliation. I have, however, noticed a good number of gypsy moth traps over the last couple of years and do find it curious that data from this trapping program is nowhere included in the EA to justify the purpose and need. It is also likewise curious that if, indeed, slowing the spread of gypsy moth is the rationale for this logging 'treatment,' then why did the USFS not follow up with a mating disruption program in coordination with Virginia Department of Agriculture and Consumer Services (VDACS) and its Slow the Spread program, such as was carried out in 2018 in other Southwest Virginia counties in areas of "low density populations" of caterpillars, which would certainly apply to Dismal, then and now? At the public meetings, however, it quickly became clear to me that the actual evidence of the presence of caterpillars was unnecessary for the USFS to attempt to justify this logging project masquerading as insect management. I was told that if the trees are not yet infested, they will be. If there is no evidence now, there will be. And even if there is not, if we cut the forest down now while its good and healthy it makes coppice regeneration more likely to succeed. If this is not 'burn the village down to save it' mentality in action, I don't know what is. Clearly, this is a logging project in search of justification.

Public Involvement/NEPA

As far as the analysis in the EA goes, that is also (and unsurprisingly), likewise flawed. To begin with, a project of this magnitude probably requires an Environmental Impact Statement (EIS) to be performed, not a cursory glance (justified by virtually exclusively academic research) in an Environmental Assessment. This is particularly imperative with additional logging projects in Phase 1 and 6000 acres of prescribed burns proposed for the Dismal watershed. The cumulative impacts must be fully analyzed and addressed, particularly since 'forest health' exemptions were used by the FS to avoid doing a rigorous environmental analysis for those projects. It is also notable that the agency only received four comments to its scoping process, and I was at one of the public meetings that had only a representative from Rep. Griffith's office and myself in attendance. Clearly, the short list of "Agencies and Organizations Consulted" at the end of the EA was not an adequate enough list to substantially engage the public. Was that not a real priority, or just a checkbox to mark before proceeding onward?

Riparian Impact & Sedimentation

I am regularly aware of the amount of runoff that comes down Dismal in a major storm event, or multi-day rain events. The creek is swollen, turbid and well out of its banks even four stream miles up the drainage. At the Falls of Dismal, the water is brown with sediment. Clearly, disturbances in the watershed already have an impact on water quality and habitat for clear-water species. To simply brush off the inevitable added impacts which would result from this projects as a marginal percentage increase or suggest that somehow when the project is 'completed' that additive sediment loads will somehow cease strains credulity.

The EA inadequately addresses the impacts of sedimentation on a relatively pristine brook trout stream such as Dismal Creek. The USFS EIS on the AEP 765kV Transmission Line documented the singular quality of this watershed. Just suggesting that riparian protections will be provided does not make it so, particularly when the riparian protections afforded in the Forest Plan are as weak as they are to begin with. The ineffectiveness and lack of enforcement of BMPs/Plan Standards and other mitigation measures was documented by the USDA Office of Inspector General, who found that logging on National Forests often failed to follow mitigation measures, failed to conduct required water quality monitoring, and failed to prepare adequate riparian area analyses. U.S. Dept. of Agriculture, Office of Inspector General, "Forest Service Timber Sale Environmental Analysis Requirements," No. 08801-10-At (January 1999).

The riparian corridor is not wide enough and activities are not limited enough to protect all riparian functions. The narrow riparian corridor does not protect all riparian functions, which include providing wildlife habitat as well as protecting water quality and instream habitat. Logging within these narrow corridors is a recipe for riparian degradation. The focus of management activities in any of these areas should be primarily to protect watershed resources, not promote timber extraction.

Roads, soil disturbance and invasives

The analysis likewise cursorily dismisses the impacts of roadbuilding, even temporary logging roads, as an integral part of this project. In fact, roads foster the entry of exotic plants by providing access for dispersal through human activities. Vehicles and machinery are major transport mechanisms that spread exotic plants. When a vehicle drives through a weed infested area, seeds, spores or vegetative parts may become lodged in the tire treads and undercarriage. They can travel for miles before becoming dislodged in uninfested areas (BLM 1993, Cale and Hobbs, Sheley et al. 1997).

Soil disturbance plays a major role in the spread of exotic plants (Elton 1958, Mooney and Drake 1986, Hobbs and Huenneke 1992, Pickett and White 1985). Soil disturbance caused by road building changes the microclimate of the area, allowing opportunistic exotic plant the opportunity to colonize. Several studies have focused on experimental soil disturbance (Kotanen 1997, Zink 1996). Both studies found that when soil was excavated and biomass removed, exotic plant species colonized quickly and completely, outcompeting native vegetation. Johnstone (1986) asserts that plant invasion is caused by removing a barrier that previously excluded a plant from a site. An exotic seed or propagule can "wait" as a dormant seed or suppressed seedling until some disturbance destroys its competitors. Roads clearly remove barriers (vegetation/biomass) that exclude plants from a site.

All of this is particularly ironic in that Dismal is now currently under threat of takeover by Russian/Autumn olive, intentionally introduced by the USFS and Virginia Game and Inland Fisheries (VGIF) 60 years ago.

Oak regeneration and forest composition

This project, the Forest Plan notwithstanding, completely ignores the natural evolution and composition of forests over time. Again, as the AEP EIS confirmed, the national forests do NOT exist in isolation from the landscape of which they are a part, and management of our public resources must also take into account the rest of the landscape which surrounds them. If mature forests and old growth are in increasingly short supply in the private lands surrounding the Forest (as massive clearcuts on the north side of Big Walker Mountain may suggest), then it is incumbent on the Forest Service to take that fact into account when it suggests that the overwhelming need if for this Ranger District to create more early-successional habitat. In context, this is bogus. The project also proposes that attempting to force a forest into an oak-dominant regime will be successful, when there is much data to suggest that these forests may instead likely revert to yellow poplar forest, which was a natural next step after the disappearance of the American chestnut. The proposed action leaves far too few reserve trees and leaves too little basal area to adequately promote healthy forest regeneration and ecosystem health, but rather is primarily designed to extract the most timber.

The specifics of oak regeneration is less science that this EA would have one believe. Even so, the EA states: "Adequate regeneration is expected primarily from stump sprouts of smaller to medium oak stumps." This would lead one to believe that no saw log extraction would occur within those 268 acres (17 units) set aside for coppice regeneration. The agency would have the public believe that it is simply the size of the artificial openings fabricated by logging that determines whether or not oaks can reestablish and sustain themselves at these sites. But this ignores relevant and available scientific research that shows it is not just openings, and their size, but

other factors that matter. In fact, Even-age logging can actually exacerbate shifts in forest composition away from oak.

If the USFS is serious about encouraging a diverse and natural forest environment on a landscape scale, then one-two year shelterwood clearcuts are certainly not the mechanism to do that. The Forest Service should focus on uneven-age and other thinning options and management based on age, species, health and vigor. The USFS should create jobs training for and in the forest carrying out that work, rather than jobs in the timber industry. It is therefore telling that the only economic analysis in the EA focuses entirely on the monetary benefits of extracting 2.93 million cubic feet (MMCF) of healthy standing timber.

Recreation

As noted, I live and recreate in the Dismal Creek watershed, and anyone I talk with-hikers, horseback riders, fishers and others-make it clear that their recreational experience will be negatively impacted by coming upon large clearcut units. A five foot 'beauty strip' along a horse trail is barely a nod to enhancing the recreational experience. Dismal is a rather unique recreational destination for many users of various interests, but I can almost guarantee that logging is not on the list. Nor have I talked to anyone who suggests that creating habitat for woodcock or grouse in an interior forest is worth the impacts to water, wildlife and environment by creating 1200 acres of logging and roads. These are management priorities more suited for edge habitat.

Climate change

Finally, in this place and at this time, we can no longer pretend that we do not need to address at every instance what the effects of our actions will be on the climate and long-term sustainability of the planet. To paraphrase that old saw about a million dollars here and a million dollars there, a few (thousand) trees here and a few (million) trees there and before you know it you have a forest. The EA provides absolutely no analysis, not even a sideways glance, as to the potential carbon or climate impacts of removing millions of cubic feet of mature forest in the Southern Appalachians. The time for a blind eye towards climate disruption in ecosystem management is long past, and this analysis is woefully, if not criminally, inadequate in that regard. If, for no other reason, this analysis needs to go back to the drawing board for a do-over, if not a reconsideration of the entire project, as conceived. A new EA (if not an EIS) should be drafted which includes rigorous analysis of these issues and an alternative that incorporates those issues and considerations.