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Organization: Potomac Appalachian Trail Club  
Title: Chair, Conservation Committee  
Comments: George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke VA 24019  
attn: Elizabeth LeMaster

Dear Ms. LeMaster:

On behalf of the Potomac Appalachian Trail Club, I submit the enclosed set of comments on the USFS proposed "Forestwide Oak and Woodlands Restoration Project" for consideration by the GWJFS as it develops its required environmental assessment under NEPA, and for inclusion in the decision record for this proposed project.  
Thank you,

Lowell Smith, Chair  
Conservation Committee  
Potomac Appalachian Trail Club

Enclosure (1)

POTOMAC APPALACHIAN TRAIL CLUB  
commentary on the  
FORESTWIDE OAK AND WOODLANDS RESTORATION PROJECT  
proposed by the  
GEORGE WASHINGTON-JEFFERSON NATIONAL FORESTS  
submitted 30 OCTOBER 2020  
contact: Lowell Smith

These comments are submitted on behalf of the Potomac Appalachian Trail Club (PATC) and its more than 8600 members. PATC members from our four state region are active in hiking the George . Washington-Jefferson National Forests (GWJNF). Importantly for the public, our members provide an essential public service by maintaining 259 miles of assigned trails in these forests. This essential work requires more than the full time equivalent of two and a half worker years annually. Such volunteer efforts were honored by the PATC having been awarded the Chief's Enduring Service Award this past year. This public service is critical to maintaining the network of trails within the GWJNF, as otherwise there are insufficient government resources to maintain these trails without this public-private partnership relationship.

Many of our members have extensive on-the-ground knowledge of the GWJNF that complements and adds to the information base contained within the operating units of the GWJNF. Our extensive, long-term, detailed knowledge of the GWJNF gives us collectively a unique perspective to comment on this initiative proposed by the GWJNF.

Given this general background, the PATC supports the goal of the GWJNF to restore these forests to a more natural stand balance as this initiative is intended to do, and is prepared to work with the GWJNF staff to further its progress towards achieving this goal.

It is important to recognize that the GWJNF are the closest national forests to over ten million individuals resident in the mid-Atlantic and central Appalachian regions, and are heavily used by residents of these regions as a primary source of outdoor recreation. In developing any initiative of this magnitude and duration, it is imperative

that the GWJNF give exceptionally strong consideration to how it can protect and enhance the immediate recreational values available to the public in these forests, while at the same time it endeavors to re-establish ecological systems that are in more sustainable balance.

Our comments are divided into two sections. First, we comment on the new NEPA process that the GWJNF proposes to utilize for this initiative. Second, we will identify issues that we request the GWJNF thoroughly consider as it develops its environmental assessment.

#### A. NEPA Process Considerations:

1. PATC recognizes that there is some merit in modifying the normally followed NEPA process for a project of this nature, but also recognizes that such modifications could, as well, entail risks if its potential pitfalls are not clearly identified, and appropriate steps are undertaken to avoid their occurrence. We are particularly concerned about the risk that this proposed process as it is described in the 27 Oct 2020 PowerPoint presentation could circumvent NEPA's public-comment requirements and would consequently lead to worse outcomes on the ground. Modifying this process along the lines outlined in these comments would serve to diminish this risk, as it could bring the adopted process back into compliance with long established principles for public involvement in the NEPA process.

2. It is too early in the planning for this initiative to determine the full scope of impacts it may produce on the natural environment and human environment. Thus, it is inappropriate at this stage of GWJNF planning and public disclosure to determine if a full Environmental Impact Statement is required under NEPA, or if an Environmental Assessment will suffice as is proposed. PATC reserves its opportunity to request a full EIS as more data and its analysis is developed and made available to the public over the coming months.

3. There is a major potential risk that the process that was outlined in the 27 Oct 2020 PowerPoint presentation would curtail or preclude the opportunity for the public to fully provide its input that would be necessary to guide the critical implementation phase of this initiative. Because of the complexity of managing ecosystem transformations as ambitious as this initiative attempts, it is critical to build into the decision making process ongoing opportunities for informing the public and encouraging its input. It is not sufficient to only provide these essential opportunities to involve the public in the project planning phase. For example, necessary data on stand locations and conditions will likely not be available at this point in the project.

As outlined in the PowerPoint it would only be in the implementation phase that field surveys will be initiated and the resulting data analyzed. The public must have full access to these created data bases, and must have the opportunity to do its own analysis and subsequently comment on the GWJNF implementation decisions that are based on these data bases. It is critical that provision is made for full public participation in the review of decisions regarding stand selection and stand treatment that are made in the implementation phase.

Ideally, the GWJNF would structure this entire process in a manner that would promote a close, ongoing working relationship with the interested public. This could be done by creating a collaborative process which would rely more on dialogue to provide continual cross fertilization of knowledge and thought, than could be accomplished solely by reliance on a series of formal comment periods. Such a model of creating a public-private partnership specific to this initiative would promote greater awareness on the part of the GWJNF and greater understanding of the necessary trade offs on the part of the public, and would likely lead to better informed management decisions

4. The PATC submits that if the GWJNF were to open up the data gathering and assessment processes of the implementation phase so that these are fully transparent to the public, the flexibility the GWJNF seeks for implementation to best respond to market conditions could be maintained. Moreover, because information processing would be done in parallel interactively with the GWJNF and the public, rather than entirely serially,

this may serve to actually shorten the annual decision making process concerning which stands to treat and the treatment methods to be employed for each selected stand. Developing an ongoing dialogue with the public could serve as a confidence building measure, as well as leading to optimized decisions.

5. Before continuing much further down this path, the GWJNF should provide the public with case studies of such attempts elsewhere to modify the NEPA process, including objective analysis of and commentary on what the outcomes have been in regard to successes and problems encountered.

#### B. Important Issues for Generalized Project Planning and Environmental Assessment:

1. The GWJNF should seek and employ the best available science to inform its decisions on how to achieve the goals of this initiative to convert stands of predominately white pine to native stands of oaks and woodlands without risking avoidable adverse consequences that could result from its selected management practices.

2. The GWJNF has been quite explicit that the selling of timber from stands selected for management will be critical to the funding of this initiative. Therefore, it is important to manage the bias this entails of an over reliance on commercial logging to obtain monetary support. PATC suggests that GWJNF should build into its decision making process barriers or hurdles in the form of special, probing analysis that would justify on non-monetary considerations the silviculture and ecological value of an intensive commercial logging option over the option of selective logging or thinning of the white pine.

3. The term "woodlands" requires careful definition. The general character of woodland landscapes in the GWJNF has changed substantially over time as a result of human intervention, and will continue to change in the future as they recover ecological equilibrium with today's climate and management conditions, and as they respond ecologically to a continually changing climate. A clearly discernible ecological state needs to be described as to what a woodland is, and what a woodland is not, as this defines the desired end product of this endeavor.

4. The GWJNF should provide early on in the design of this project information to the public regarding efforts made elsewhere that were directed to similar forest types for the purpose of managing stand type conversions analogous to those to be achieved by this initiative. The more specific to the conditions in the GWJNF such examples might be, the more useful this information would be to public understanding and to creative project design.

5. The GWJNF should consider and discuss with the public whether this project should be initiated on a smaller pilot scale, so as to learn by doing, rather than potentially making major mistakes on a larger scale that may be difficult to mitigate in the future.

6. The 27 Oct 2020 PowerPoint presentation appears to assume that only one treatment over a limited period of time would be considered for any selected stand. The GWJNF should consider the option of applying a less intensive treatment, e.g., thinning, over a multi-year period that could allow more natural processes to aid in the conversion process.

7. In the event that conversion of a stand may require more than one treatment due to unsatisfactory results of the initial treatment, this environmental assessment should address the consequences of a partial failure with regard to required followup treatments. Consideration should be given to possible constraints on followup treatments that an initial failure may impose, and to possible limitations on followup treatments because of budgetary constraints.

8. Because the GWJNF is so intensively used by hikers, and because considerable labor donated by volunteer

trail maintainers is required to provide this outdoor recreational opportunity for the public, the GWJNF must give focused attention during this project's planning and implementation phases to understanding the impacts its decisions will have on the hiking public and its dedicated trail maintainers.

For example, our PATC trail maintainers have experienced greatly increased effort to keep trails open in areas where timber cutting and hot, tree-killing fires have been implemented in the GWJNF. Such activities can result in numerous fallen trees blocking a trail, and in excessive growth of briars and other invasive vegetation over the trail tread due to their release by extensively opening up or removing the canopy. A recent incident was that PATC sawyers had to cut out 22 blow downs on the popular Hone Quarry Loop trail because of repeated prescribed burns that killed the standing trees, and these were subsequently allowed to fall over the trail. Creating objective hazards such as this can also pose increased risk of serious injury or death to members of the hiking public.

9. There are other recreational users of the GWJNF which may be less numerous than the trail hikers and maintainers. These other non-mechanical recreational uses of these two forests must be understood and protected during the design and implementation of this project. Backpackers, trail runners, equestrians, bird watchers, forest gleaners, nature observers, inter alia, all should have their opportunities to use these forests respected and protected.

10. Mechanical management measures, including temporary road construction and road reconstruction, must not be permitted in Potential Wilderness Areas. They must be entirely excluded from application in the PWAs. To do otherwise would be contrary to the intent of the Forest Plan for the George Washington forest, as these actions could harm a PWA's designated Wilderness potential.

11. The implementation phase of planning for this initiative must recognize that no timber harvesting is allowable in the Recommended Shenandoah Mountain Scenic Area. While the use of prescribed burns is allowed under the current management plan, these should be conducted so as not to harm trail assets, not to diminish the hiking experience in this special area, and not to place a greater burden on trail maintainers.

12. Wetlands, riparian areas, and rare or endangered species habitat are especially important resources for the GWJNF to identify, conserve and protect. Such forest elements will require special planning attention to develop conversion management measures that do not disrupt or alter their unique character, including each of their important intrinsic attributes.

This is an element of project design, inter alia, that explicitly requires interaction with the interested public, including public comment, on any stand proposed for treatment that includes or influences the status of these special areas. Moreover, all new information the GWJNF develops on these special areas in its field surveys should be made available to the interested public in an appropriate form.

13. The GWJNF should be explicit in its initial planning regarding what special management requirements will be imposed for archeological or other historical sites, including possible sites held in special regard by indigenous people.

14. If a clear cut is the selected management measure, its size must remain within the limits currently allowed in the designated forest type.

15. Any modified shelter-wood management measure should aim to leave groups of standing trees, as single trees are too prone to wind fall, and provide less of a representative ecological island from which a new forest can spread.

16. PATC does not understand the need for temporary and reconstructed roads to extend as long as one mile for a selected stand to be treated, especially since one criteria for stand selection is that it is within 50 feet of an

established Forest Road. This is an issue concerning which the GWJNF should enter into a public dialogue.

One suggestion would be for the GWJNF project planners in consultation with the public to establish an upper cap on the total mileage of temporary and reconstructed roads to be permitted in total for all stands to be treated under this project. Establishing such a limit would increase the care with which decisions for additional road building and reconstruction will be made.

17. Plans for the permanent eradication of temporary and reconstructed roads is also an issue that requires special care. PATC requests that these areas be reseeded or replanted with natives, and that effective barriers be utilized to prevent their use by unauthorized motorized vehicles. This would substantially reduce the risk that non-native invasives would quickly dominate these disturbed areas.

18. Analysis that resulted in limitation of treatment stands to 35% or less slope should be made available to the public, and the opportunity for dialogue with the public concerning its appropriateness should be provided.

19. Analysis that resulted in targeting 1100 acres annually in the George Washington forest, and 700 acres annually in the Jefferson forest should be made available to the public, and the opportunity for dialogue with the public concerning the appropriateness of these targets should be provided.

20. As indicated in A.3. above, it is critical that the results of field surveys, and the analytical use of resulting data to make stand selections be made available to the public, with the opportunity for public dialogue and comment. This will be necessary because until the field surveys are made, and their resulting data analyzed, it will not be possible to assess the silviculture and ecological consequences of alternative management strategies. If the GWJNF has established an open dialogue relationship with its interested stakeholders when it enters the implementation phase with an open exchange of information, consensus on the stand selection and treatment methods may be more readily achieved.

21. Controlling the spread of invasive non-native plant species will be a challenge for this project. The propagules of these species are readily spread by mechanized equipment, and they readily establish in disturbed areas. PATC trail maintainers exert much effort to limit the establishment and spread of these species along the trail corridors they maintain, and even so the results are mixed. The GWJNF may be less successful in maintaining control of invasives during its routine management operations, as we find within the Lee District abundances of Garlic mustard, Japanese stiltgrass, Mile-a-minute vine, Ailanthus, Japanese honeysuckle, Oriental Lady's thumb, and Multiflora rose, and such invasives are also continuing their spread along the roads and trails of the North River District.

As the goal of this initiative is to restore non-native stands of white pine to native stands of mixed hardwoods, it is very important that this not result in the establishment of other non-natives that could then use their newly established territory as the locus of a new spreading center. Treatment of any stand that is near current populations of invasives should be carefully planned and implemented so as to minimize the risk of its becoming infected with such invasives. Special care should be given to ensuring thorough inspection and cleaning of all equipment and personnel that are utilized.

22. Insect invasives are also a cause for concern. Frequently, as with the Spotted lantern fly, human mobility can be the major vector for spreading harmful insects. Tools and motorized equipment coming from infected areas must be inspected and thoroughly cleaned to prevent the introduction and spread of detrimental invasive insects.

23. The importance of requiring scrupulous measures for all Forest Service and contractor personnel to follow in the control of invasive plant and insect species cannot be overstated. Consequently, the issue of whether this is feasible, and if so, what measures should be required for this work to meet an adequate standard of certainty for non-introduction should be a defined element of this environmental assessment

24. The consequences of climate change can have important impacts on mid-Atlantic forest resources, including placing increased stress on some forest species. It is important in planning this project that the effect of a changing climate on forest ecosystem succession be understood and taken into account. This must be done considering the multi-decadal, multi-century nature of climate change.

Mature and maturing forests are important carbon sinks, globally and regionally. To fulfill its NEPA responsibility, GWJNF should quantify the integrated change in carbon flux that would result from temporarily changing a net carbon sink forest stand into a net carbon source, and this should be done cumulatively over all treated stands for the number of decades required for the converted stands to approach maturity. A reasonable attempt should be made to balance the gain in biodiversity to be achieved by the management of white pine stands with the negative results of the changes in integrated carbon flux over time.

25. The ecological advantages of thinning stands of white pine over time to allow a more natural conversion to a non-dominant white pine stand should be carefully analyzed, and this should be done as a function of percentage of white pine initially in a stand. Such analysis should consider the probability of attaining the desired natural ecosystem end state relative to that likely to be achieved by other management practices.

Any excess cost of carrying out this practice compared with clear cutting should be made explicit, and available to the public for dialogue and public comment. Dialogue with the public and the opportunity for public comment should also be provided for any proposed methodology to balance ecological advantage against differential cost.

26. For any mixed stand to be treated, criteria should be established for the maximum planned removal or incidental loss of existing hardwoods and yellow pine during the treatment process. The goal should be to protect all existing mature individuals of a desired species and promote the release of as many saplings as feasible, while at the same time encouraging the well-being of any nurse species present. Priority should be given to a natural transition to a new mix of stand species composition, analogous to what occurs naturally when the fall of a large tree creates a temporary canopy opening.

27. As the manager of a cabin available for public rental within the GWJNF, PATC has an interest in the effect that stand management could have on the environs of the cabin, and on the environment that our renters would experience in their hike to the cabin. Opportunity should be provided for those in this situation to work with the GWJNF to avoid or mitigate harm that they could sustain as a result of decisions regarding stand selection and treatment methods.

28. Active and sustained monitoring following the implementation of treatment measures on each stand must be an important planning element of this initiative. Failure to adequately monitor would circumvent the purpose of the NEPA effort, and would leave the GWJNF vulnerable to repeating mistakes unnecessarily.

The PATC trusts that the GWJNF will find these comments useful as it considers what path to choose as it moves forward with this project. PATC volunteers with expertise on these identified issues will offer their insights and efforts if invited to participate with the GWJNF in the conduct of this initiative.