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Forestwide Oak and Woodland Project

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Deputy Supervisor LeMaster:

The following are comments on the Forestwide Oak and Woodland project submitted on behalf of the Virginia Chapter of Sierra Club.

An Environmental Impact Statement is warranted for this project. The project is of large scale, extending to perhaps 10s of thousands of acres with no sunset date. The project is controversial in nature because it proposes a significant departure from NEPA. There is considerable uncertainty about the extent, geographical scope, or resources affected by the project, and it is unlikely a Finding of No Significant Impact would apply. Therefore, an environmental impact statement is warranted.

We support incorporating the alternatives proposed by Southern Environmental Law Center as alternatives in the NEPA analysis. We are unfamiliar the project in the Cherokee National Forest that was mentioned, and do not necessarily endorse it without further study at this point, but support expanding the alternatives under consideration to include concepts and processes such as these. We may endorse it (or decide not to) at a future point in time. The Forest Service should also consider an alternative that appropriately manages white pine stands using techniques other than commercial logging. The use of commercial logging could bias the selection of stands towards those that are primarily valuable for commercial logging, rather than those that warrant treatment for ecological reasons.

The project is too wide in scope and could include clearcutting or other logging in stands with only minor or tangential white pine component including stands with only a 30% white pine component, white pine - cove hardwood stands, and white pine - upland hardwood stands. The analysis should disclose how many such acres of stands with only a 30% white pine component, white pine - cove hardwood stands, and white pine - upland hardwood stands exist across the GWJNFs and how these areas and resources dependent upon them will be impacted. How large would the "implementation projects" be? How closely would they be concentrated? What resources would be impacted?

The project could impact old growth forest, late successional forest adjacent to old growth tracts, potential wilderness areas, roadless areas, mountain treasure areas, wild and scenic river (and eligible) corridors, the Appalachian Trail corridor, scenic areas, geographical areas, botanical areas, special areas, Peaks of Otter salamander management areas, TESLR bat habitat areas, TESLR salamander habitat areas, wood turtle habitat areas, rare communities, Natural Heritage conservation sites, TESLR species habitats, backcountry areas, remote backcountry recreation areas, semi-primitive areas, and other important areas. Because of the way this

project is set up, the public does not know how these areas (or species dependent on them) will be impacted. The Forest Service should commit to avoiding such areas in the decision. The analysis should disclose how many acres of stands with only a 30% white pine component, white pine - cove hardwood stands, and white pine - upland hardwood stands exist in such areas across the GWJNFs and how these areas and resources dependent upon them will be impacted.

No maps are provided in the scoping notice. Maps of the areas potentially impacted should be provided and the public should be allowed to comment in an official comment period, based on this new information.

The scoping notice does not specify how much logging would occur per year across the GWJNFs. The SN states that "the average annual acreages" would be 1,800 acres per year on the GJNFs but does not specify the maximum acreage that would be logged or the minimum acreage, what resources might be impacted, what the cumulative impacts would be or whether the total logging would be in compliance with the Forest Plans, laws, regulations and other provisions.

Roads are limited to "one mile" per "implementation project" but the FS does not state how many implementation projects would be allowed per year, or how many implementation projects could occur within any geographical area. The FS should disclose how many roads would be permitted under this project, how close the roads would be to one another, the total mileage of such roads, or what resources would be impacted. The FS should focus on areas close to existing roads and should not construct any new roads as part of this project.

No maps of roads are provided in the scoping notice. Maps of the roads and areas potentially impacted should be provided and the public should be allowed to comment in an official comment period, based on this new information.

The specific way the NEPA process is to operate for this project after the initial decision is amorphous and not fully described in the SN. Analysis for future "implementation projects" should be rigorous and should be consistent with NEPA. The public should be allowed to review environmental analysis, comment on it, and object to decisions using the objection process for each subsequent implementation project.

Because of the loss of hemlocks to the hemlock adelgid, the FS should analyze whether the removal of other evergreens in coves, streamside areas, and other areas at this time may adversely impact species that relied upon evergreen forest cover, including trout, other aquatic species, salamanders and other species.

Cumulative impacts of this project across the national forests should be analyzed. Cumulative impacts of this project in combination with the Forest Plan amendments (variances or exceptions) proposed as part of the Mountain Valley Pipeline project should be considered.

Thank you for the opportunity to comment.

Sincerely yours,

Sherman Bamford
Forest Issues Chair
Sierra Club - Virginia Chapter