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Comments: POTOMAC APPALACHIAN TRAIL CLUB
Comments on
GW-JNF Draft Environmental Assessment
Sandy Ridge Yellow Pine Enhancement Project

attn: MARY YONCE,
Lee District Ranger

The Potomac Appalachian Trail Club (PATC) appreciates this opportunity to comment on the "Sandy Ridge Yellow Pine Enhancement Project Draft Environmental Assessment" now open for public review and comment.

The PATC, representing, its 8600 members, has a long standing interest regarding the protection and use of the many resources found within and managed by the George Washington & Jefferson National Forest. Although our membership's interest is focused primarily on other areas of the Forest, particularly on the use and management of resources within the North River District and the Virginia counties of the Lee District, we, nonetheless, have a developing interest in protecting and promoting the ecological integrity of the entire GW-JNF. This aspirational goal is becoming increasingly important to achieve, as the public's recreational demand is rapidly accelerating for access to natural recreational opportunities in the remaining wild lands of the East.

We commend the GW-JNF's Interdisciplinary Team for its professionalism and thoroughness in developing this useful Environmental Assessment (EA). This EA clearly outlines the goals to be achieved by this project and generally provides adequate description of the means by which to achieve these goals. The PATC strongly supports all efforts to restore forest stands within the GW-JNF to conditions found within this biogeophysical province before it was subjected to intensive resource extraction. This project is for the most part consistent with this goal.

As the project is described in its several aspects, discretion will be delegated to on-the-ground personnel for assessing the need for and implementation of specific techniques and practices. While understanding the desirability of this approach, we encourage the proactive monitoring of such decisions, as well as of their on-the-ground consequences, by your staff specialists in the physical and biological sciences. Team decision making and long-term monitoring and assessment of the results will be important to improving the success to which such projects within the GW-JNF will be achieved in the future, as well as optimizing the results from this project.

We suggest that in the light of the protracted secular trend in climate change that we are now experiencing, and the scientifically based projection that this trend will continue for many decades into the future irrespective of actions undertaken today to mitigate greenhouse gas emissions [see Intergovernmental Panel on Climate Change, Fifth Assessment Report, Work Group I, chapter 12, at https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_Chapter12_FINAL.pdf], that this extended trend in climate change could potentially have profound consequences for changes in present ecological systems within this project area. As the time horizon for evaluating the merits of this project extend from thirty to more than fifty years, it is important to take into account during its detailed planning that the local climate conditions thirty and fifty years hence will not be those of today.

A warming climate forces an acceleration of the global and regional hydrological cycles. Increasing intensity and frequency of intense precipitation events, drought stress, pathogen population dynamics, increasing fire frequency and intensity, and changes in local hydrology should all be anticipated. These factors along with

changes in minimum and maximum temperatures will increase the probability that ecological communities will tend to either migrate across the landscape or result in their partial disassembly and replacement. [see Fourth National Climate Assessment, vol II, chapters 6, 7, and 25 at https://nca2018.globalchange.gov/; and Intergovernmental Panel on Climate Change, Fifth Assessment Report, Work Group II, chapters 4 and 26 at https://www.ipcc.ch/report/ar5/wg2/]. While, at present, the maturity of climate change science and ecological science is not sufficient to give precise, geographically granular projections of ecosystem response decades hence, it is of sufficient maturity to give qualitative guidance for the detailed planning of this project to consider a range of climate-change-forced changes to forest stand assemblages that will likely occur over the next half century.

The effort described in this EA to control non-native invasive vegetation is critical, as is dedication to ensuring that these efforts are stringently monitored, thereby ensuring that they are fully employed throughout the implementation phase of this project. We cannot stress too strongly the necessity of such monitoring and expert on-the-ground guidance of those performing these control activities.

The plan to exclude identified stands of old growth forest from any form of treatment (except for prescribed burns) is strongly supported. Among other positive attributes of these stands that serve the public interest is the value these stands can provide for establishing a baseline of native forest conditions before the historical introduction of intensive resource extraction and management practices. It should be a high priority to identify any such stands not previously inventoried to ensue that all stands of old growth are protected while implementing this project, including the use of a protective exclusion zone of adequate size surrounding each old growth stand.

Similarly, the reserving of 200 acres for "control areas" is desirable. To optimize the usefulness of these for scientific purposes it will be necessary to pair such control reserve areas of appropriate size with treatment areas of interest that posses similar physical, biological and ecological attributes. This EA is silent on how this will be done, what data will be collected and stored in an integrated data base, and how these data will be analyzed. We suggest that such an element, analytically constructed in the early phase of your project planning, could result in substantially increasing over time the Forest Service's and the public's understanding and appreciation of the longer term consequences of projects such as this. Additionally, you may find after detailed planning that more than 200 acres of control areas will be required for follow up assessments of the extent and mechanisms by which this project may have contributed to long-term forest health.

The PATC appreciates the opportunity to comment on, and contribute to furthering the success of this project.

Submitted by:
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