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Organization: Virginia Wilderness Committee

Title: Executive Director

Comments: Dear Ranger Yonce:

I am submitting comments on behalf of the Virginia Wilderness Committee (VWC) regarding the recently released draft Environmental Assessment (EA) for the North Shenandoah Mountain Restoration and Management Project (NSM).

VWC recognizes the time and effort your staff has put into bringing this project to this stage. Undertaking a large landscape-scale project is not an easy task, and we appreciate your efforts. Over the course of its development, you and your staff have worked to include the public in the development of the NSM. We appreciate all the meetings and field trips organized by you and your staff to provide us and others with an opportunity for input. VWC attended all of these events. We also appreciate that some of your decisions regarding this project were clearly a result of taking public comment and including it in your analysis. Thank you for this.

As members of the GWNF Stakeholder Collaborative, we recognize that there is substantial ecological departure from desired conditions in this area. We flag a few issues and tweaks for your attention below, which SELC discusses in more length in their comments. We look forward to helping with these however possible and are confident this project can move forward swiftly with continued collaboration. Chief among them, the stands in the project area tend to be older with more closed canopy. This project should help move the forest toward to more desired conditions as laid out in the Revised Forest Plan. In achieving these objectives, we feel the project will help move the needle toward greater ecological restoration and resilience by creating a diverse structure of age classes and canopy.

We support the use of active management techniques including various mechanical treatments such as Timber Stand Improvements, Commercial Thinning, and Regeneration Harvests to achieve desired results. We also support and appreciate the District's commitment to removing existing old growth from proposed harvest units given the rarity and importance of old growth forest in the Southern Appalachians and the limited existing old growth forest that has been identified in the field on the North River District. With regard to leave trees in harvest units, we request the District consider maximizing the amount that is left in clumps. This technique was used in the Lower Cowpasture and seems to have resulted in a higher survival rate for leave trees compared to single standing trees.

We support the use of prescribed fire to achieve desired results. Fire has been an integral part of the forest ecosystem for eons. We believe that the restoration of fire on the landscape will help restore and create desired canopy gaps throughout areas that have been identified for prescribed fire, especially in areas that have seen repeated entries. As you also know, fire effects monitoring published by the Forest Service, and The Nature Conservancy is also showing that prescribed fire often results in the creation of some early succession habitat.

We support restoration of shortleaf and other yellow pines in the project area. This component of the forest has been severely reduced due to harvest and lack of fire. We also welcome efforts to reintroduce the American chestnut, which currently is constrained to the understory due to disease. Any attempts to reestablish their place in the forest canopy is appreciated.

We support the proposed stream restoration work included in the project including removal of unneeded or inaccessible roads, especially the road in the Beech Lick Knob Wilderness Study Area. The replacement of culverts will help with water quality, and we are pleased to see that bottomless culverts are being considered. These will significantly improve passage for aquatic organisms. We also support all efforts designed to prevent

timber harvest or ground disturbing activities in protected riparian corridors for perennial and intermittent streams, and only partial harvest is allowed within channeled ephemeral corridors.

We also support the Agency's ongoing efforts to protect the Cow Knob Salamander. We were pleased that areas outside the Shenandoah Mountain Crest prescription that are found to support the salamander will be protected as a part of the Crest Zone. We also support efforts to protect Wood Turtles and protect/enhance their desired habitat.

We look forward to seeing the BE/BA for this project as we are concerned about possible effects that some of the proposed commercial harvest and/or prescribed burning could have on the endangered and rare bee species that were discovered in the project area. Before finalizing any management actions in these areas, we ask that the agency identify all of the bees that were collected, survey appropriate proposed units for their presence, and analyze all potential impacts of the proposed management on the bees.

We also ask the District to consider whether additional analysis and mitigation measures are necessary to ensure the project has no significant impacts on the Shenandoah Mountain salamander. As you know, this is a Region 8 Sensitive Species. It is not clear from the Draft EA that these salamanders are adequately provided for currently, particularly in proposed units outside management area 8E7.

While we support the use of prescribed fire in the project area, we would like to flag an unintended consequence it can have on trails. Specifically, using trails as fire breaks can create very brushy conditions, which sometimes make the trail difficult for users. This in turn increases the workload on volunteers who maintain the trails. We value the various benefits, including ecological, of using trails as fire breaks instead of dozer lines, but request that the agency also plan for the additional trail work this may create for the future. The need to do this is particularly high in light of the high public interest in using forest trails, the limited number of existing trails in this area, the agency's limited capacity for trail maintenance and volunteers' performance of this work, and the overwhelming nature of asking the volunteers to complete additional work to mitigate the trail impacts of this proposal. The agency should commit to completing any necessary post-fire rehab work on the trails as a design feature for this project.

In the future, we would also like to see the addition of the Carr Mountain Trail to the trail system in this area. It would be a wonderful addition in this area, in which so few trails exist, and recognition of the value and work that hiking clubs and mountain bike organizations assign to the trail.

Another issue related to active management activities is the resulting increase and spread of nonnative invasive species (NNIS) following ground disturbance, fire, and other project activities that will increase light reaching the forest floor. We appreciate the agency's discussion of NNIS in the Draft EA and are curious about how the District concluded that proposed ground disturbance and fire - including in areas with existing infestations of NNIS - would lead to a decrease of NNIS in the project area. That would require an amount of NNIS pre- and post-harvest treatment to exponentially exceed what has been done with other projects on the GWJNF. Does the District have more ambitious plans and funding for dealing with NNIS than anything that has occurred on the GWJNF in the past? We very much hope that is the case and urge the District to provide more specific information about monitoring schedules and plans in the Final EA and Decision Memo.

We appreciate the mention of the Beech Lick Knob Wilderness Study Area in the draft EA. While Beech Lick Knob is not central to the project's proposed management, it is an integral part of the landscape. The documentation of Beech Lick Knob in the draft EA helps the public understand that Wilderness is a part of the landscape and a critical part of a forest mosaic.

Related, we very much appreciate the District's analysis of potential impacts of proposed management on the Beech Lick Knob Potential Wilderness Area (PWA) and determination that actions will not impact the PWA's

eligibility to be considered in future wilderness inventory and evaluation processes.

Last, we look forward to following along and providing input throughout implementation of this project. Given the collaborative nature of this project, the District should be sure to continue the collaboration into implementation, as the Warm Springs District did with Lower Cowpasture. As a part of the implementation of this proposal we would like to see periodic updates similar to the one sent out for the Lower Cowpasture. Regular newsletters and field trips help educate the public on the need for, progress, and successes of the project.

Our hope is that this project, when implemented, will restore forest health and meet the goals of diverse stakeholders, and that Beech Lick Knob, a core wild area, will be permanently preserved through Congressional designation as Wilderness.

Thank you for taking the time to review these comments.

Sincerely,

Mark Miller, Executive Director

Virginia Wilderness Committee