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Elizabeth LeMaster

Deputy Forest Supervisor

George Washington and Jefferson National Forests

5162 Valleypointe Parkway

Roanoke, Virginia 24019

Re: Forestwide Oak and Woodland Restoration Project

Dear Ms. LeMaster:

I am writing on behalf of Friends of Shenandoah Mountain to comment on the Forestwide Oak and Woodland Restoration Project. First, I would like to thank Forest Service staff for the excellent online presentation a couple of week ago. It was so informative and well organized.

Friends of Shenandoah Mountain generally supports converting white pine stands to native oak and woodlands through thinning, burning, and harvesting timber in appropriate locations across the forest. In many places across the GWJNF, restoration efforts like this would benefit wildlife by encouraging oaks and would also improve the health of the forest. Focusing this project on white pine stands near roads makes sense because it minimizes the need to build roads.

Our main concern about the project is that the public is asked to give comments on a process without a map of the tracts to be restored. In fact, it sounds like the Forest Service has not even decided where restoration should happen. This makes it hard to give meaningful input.

The differences in places where restoration could occur will affect the impacts that restoration would have, as well as whether particular approaches to restoration in those places would be wise. For example, boundaries of the proposed Shenandoah Mountain National Scenic Area were drawn to exclude the Shiflett Plantation area in the upper North River watershed to allow for management in the future. This area has extensive stands of white pine that were planted by the CCC and the Forest Service upstream from Elkhorn Lake and Staunton Dam, both municipal water sources for the City of Staunton. If this area were proposed for treatment, we would urge against use of herbicide treatments and against clearcutting in the flood plain of this flood-prone area. Such management activities could lead to possible contamination of the water supply, as well as erosion resulting in siltation in the North River and the municipal reservoirs. We would not have these same concerns for many other locations. The problem is we just don't know where this project would take place.

We urge caution about any project areas in municipal watersheds and flood plains. Local governments may not pay attention to this very broad project, as proposed, because they simply cannot know whether they will be affected until the Forest Service tells the public where this project would take place. As a result, local governments might wish they had been able to have input on areas of special interest to them, only to discover that they found out too late.

Another issue of particular concern to us is whether treatments would have a negative impact on recreation resources, such as trails. If prescribed burning is used to treat a project area which happens to have trails through it, then that burning may degrade the recreational resource and put a much greater burden on volunteer

trail maintainers for years to come. In some cases, longstanding trails may even have to be closed.

Lastly, we are concerned about the alarming rate of spread of Nonnative Invasive Species (NNIS). Whether the treatment is cutting or burning, NNIS often get started in areas with more light. Once they get started they are nearly impossible to stop, and sometimes the Forest Service lacks adequate resources to eradicate them. We would urge caution about opening the door to invasive species, especially in sensitive areas or popular recreation areas.

If the Forest Service could provide us with a map showing project areas, then we might be able to enthusiastically support this project.

Thank you for the opportunity to comment.

Sincerely,

Lynn Cameron
Co-Chair
Friends of Shenandoah Mountain