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Organization:

Title:

Comments: From the DEA on Wood Turtles:

"Secondary effects include deterioration of stream integrity and water quality, increased predation on nests and juveniles, accidental mortality on roads, increased access to and take by commercial poachers, and incidental take of turtles by recreationalists are all known to have impacted wood turtle populations."

"The GWNF and adjacent properties afford the most immediate, and possibly the best, opportunity for conservation of wood turtle populations in Virginia because of the Forest Service's public ownership, overall size, contiguity, and relatively low degree of land conversion."

"Five roads planned for the Project ford streams and tributaries potentially inhabited by wood turtles at approximately 18 crossings. However, temporary bridges will be installed at fords to accommodate heavy equipment crossing during road and pad construction and road reconstruction."

It is precisely the direct, indirect, and/or cumulative impacts of this project along with the impacts of projects such as the Shenandoah Mountain timber sale (dishonestly called "restoration") that is leading to loss of Wood Turtle viability on the Forest and/or causing a trend toward federal listing under the ESA.

The FS refuses to recognize this. Instead, this DEA contains more unvalidated conclusory assertions regarding impacts and the Turtle's viability. Just as have the other EAs on the GWNF with regard to Wood Turtles (see North Shenandoah Mountain project 2020).

I raised this issue of impacts to the Wood Turtle from this project in conjunction with those from the North Shenandoah Mtn. Project in my comments and objection of the NSM project. Those are already in your possession. I incorporate those comments and the appeal by reference into this comment. The issues, concerns, and information regarding Wood Turtles raised then are relevant now.

Briefing contract workers on wood turtle biology by a qualified biologist does NOT stop or significantly reduce the impacts from the project.

This project must not occur in, across, or around known or potential Wood Turtle streams or their terrestrial habitat during their active season (i.e., not hibernating). Otherwise, significant impacts may occur.