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First name: Keith

Last name: Simmons

Organization: WestRock

Title:

Comments: Thank you for the opportunity to comment on the proposed Dunlap Creek Vegetation Management Project. I am a professional Forester, a resident of Alleghany County and a regular user of the USFS. I have spent numerous hours on Peters Mountain in a professional capacity and as a recreational user; and I am very familiar with the areas of proposed activity.

I support the proposed Dunlap Creek management activities. Most of the 18,300 acre project area is comprised of closed-canopy forest stands that are in excess of 70 years old. These stands need to be regenerated and actively managed to promote a healthy forest ecosystem as is outlined in the 2014 Land and Resource Management Plan.

The proposed timber harvesting treatments will create much needed diversity and early successional habit that is largely missing in the USFS landscape. This is very beneficial to a wide variety of native wildlife species including non-game species like the golden-winged warbler and indigo bunting. We all know that having a diverse landscape with a variety of different age classes of forest cover is capable of providing suitable habitat for a greater number of different species and more of them, than the mature and over-mature forest that currently exists.

In my time spent on Peters Mountain, I have noticed a decline in the oak component of the forest with many dead oak trees present and very little oak regeneration. I support the regeneration treatments because they will create growing conditions suitable for shade- intolerant species like the oaks. My recommendation is to prescribe and harvest more acreage by the coppice with reserves and seed tree harvest methods. Harvests designed to create a two-aged forest condition and those proposed as thinnings, often result in the regeneration of shade-tolerant species that are not hard-mast producing trees and provide less benefits to wildlife. I suggest shifting acreage proposed in the thinning and two-aged category to a prescription consistent with a regeneration harvest.

I support the decision to commercially harvest the timber using ground-based systems. This is the most common harvesting system used in this region and will generate the most interest from potential contractors. Alternative methods can be less efficient and often under utilize our forest products.

Prescribed fire is a great tool to manage forest habitat, and I support the use of fire as described in the proposed plan. However, I suggest refraining from burning any forest stands that are planned for commercial harvest. Burnt stems with blackened bark or char are not suitable or acceptable as pulpwood at the local papermill in Covington.

I support the Dunlap Creek Vegetation Management Project. The proposed plan will help create the desired forest condition as outlined in the Forest Plan. It will generate job opportunities, stimulate the local economy and provide raw material for the forest products industry as well as establish much needed forest habitat diversity that will benefit a multitude of different wildlife species and provide recreational opportunities. Thank you for the opportunity to comment on this project.

Keith Simmons

Certified Forester