

Data Submitted (UTC 11): 11/21/2020 2:00:03 AM

First name: Sherman

Last name: Bamford

Organization: Sierra Club - Virginia Chapter

Title: Forest Issues Chair

Comments: Addendum to our Objection to the Eastern Divide Insect and Disease Project Phase II.

Remote Areas/ Roadless Areas

As stated in our EA comments, pp. 1 & 16-17, we asked the FS to analyze how roadless, unroaded, remote, or area sensitive habitat, recreational, watershed and other values would be impacted. The following is an addition to our objection comments.

Although we asked the FS to analyze how roadless, unroaded, remote, area sensitive habitat, recreational, watershed and other values would be impacted, the FS failed to take a hard look at any of this. There is no discussion of potential roadless characteristics of the area or how they could be impacted. Values associated with remote habitat and remote areas were not examined. As we pointed out, Dismal Creek contains a core area of Forest Service-identified semi-primitive recreation land. Most of the area is Semi-Primitive Non-Motorized (SPNM) and a smaller portion of Dismal Creek outside this is Semi-Primitive 2 (SP-2) (Jefferson NF South Half - Recreational Opportunity Spectrum map, JNF Plan Revision. 2004. Attached (ros_s.pdf)). An important consideration is whether the proposed activities would affect the setting of the SPNM and SP-2 lands, whether controls on access would be affected, and how access could be directly or indirectly affected. An SPNM area "is 1/2 mile from all roads or trails with motorized use and generally exceeds 2,500 acres to 5,000 acres in size." "The natural setting may have subtle modifications that would be noticed but would not draw the attention of an observer in the area." "The compatible VQO is retention." See ROS Handbook, JNF Plan Revision and other guidance and regulations.

"Prohibit new road construction, including temporary roads, in semi-primitive non-motorized areas." Et seq.. (JNF Plan Rev. Std. FW-163). Are roads avoided in the SPNM area? Is the natural setting protected? Is scenic quality protected? Will the project increase access in the area, including but not limited to illegal motorized access? Will the project affect social encounters, naturalness or remoteness. See excerpts from US Forest Service, ROS: Primer and Field Guide" (ROS Naturalness, ROS Social Encounters, ROS_Remoteness (attached))

"Semi-primitive 2 areas are designated under this Forest Plan to prevent loss of semi-primitive and semi-primitive motorized recreation opportunities. Management activities and uses - including timber harvest. ... are allowed provided such use will not result in a loss of semi-primitive non-motorized or semi-primitive motorized recreation opportunities." (JNF Plan Rev. Std. FW-166). Will the project result in a loss of SPNM recreational opportunities in the Dismal Creek area? What evidence is there? How is this assured?

"[A] temporary road is not converted to an improved or permanent road". "[Temporary roads] are obliterated following the temporary use" (JNF Plan Rev. Std. FW-167). Are any temporary roads in the SP-2 project area being re-used or improved? If so, are these actually temporary roads? What roads will be obliterated after use? How long after use? Are these therefore actually temporary roads?