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April 16, 2010

Mr. Elwood Burge, District Ranger  
North River Ranger District  
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Harrisonburg, Virginia 22801  
**[comments-southern-georgewashington-jefferson-northriver@fs.fed.us](mailto:comments-southern-georgewashington-jefferson-northriver@fs.fed.us)**

Re: Scoping Notice for Prescribed Burning – Grindstone Mountain and Spruce Ridge

Dear Mr. Burge:

Please accept the following comments on the scoping notice for the proposed prescribed burns on Grindstone Mountain and Spruce Ridge.

We are concerned about this project because it occurs within the Little River Roadless Area, the Little River Potential Wilderness Area, the Oak Knob-Hone Quarry Ridge Potential Wilderness Area, and adjacent to the Oak Knob Roadless Area. The Potential Wilderness Areas meet the criteria for roadless area designation. We therefore believe they should be managed as Inventoried Roadless Areas and consistently with the 2001 Roadless Area Conservation Rule.

Part of this project also occurs within the Shenandoah Mountain Crest Special Interest Area-Biologic. We are concerned about impacts to the Cow Knob Salamander population and other salamander populations in all areas covered by both burn areas.

According to the Scoping Notice, “only existing dozer lines, roads and trails will be utilized for fire lines”. This is a positive approach. However, the condition of existing dozer lines, roads, and trails are not described, and no reference is made to the anticipated conditions after the project is completed. With travel and the movement of heavy equipment, there will be impacts on forest resources (e.g., soils, streams, riparian areas, water quality, native wildlife, etc). These impacts need to be described and discussed.

The Scoping Notice also states that “no action taken during the burns or during preparation of the burns will diminish the wilderness character and values of the area”. This is a very important point, and we want to ensure that it is upheld. The Forest Service should take whatever measures are necessary to meet this commitment. There is a question as to whether dozer lines would be

conforming uses. In Big Run Project for timber sales in the Little River Potential Wilderness Area, the February 2009 revised Environmental Assessment (EA) stated that the 205 acres of logging, ¾ mile of temporary roads constructed, and 6 logging decks planned were “nonconforming uses for areas east of the 100<sup>th</sup> Meridian” (Table 13). The revised EA also said that “new or reconstructed temporary roads and skid trails into the interior of the area” would “increase access” and “in turn, would reduce a sense of remoteness”. If effective mitigation measures are not used, this project could result in bulldozed quasi-roads that affect wilderness values and reduce the sense of remoteness.

We are also concerned that cumulative impacts of other projects and activities in the area are not being taken into account. The cumulative impacts of other activities, including the Big Run Project, should be considered. The revised Big Run EA did not consider future activities such as this proposed project.

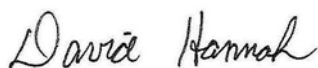
It is also unclear if Forest Service staff has surveyed the project area for the presence of old growth forest. A survey should be conducted prior to a decision on the project being issued.

Some of the objectives of the project are very general in nature. Adequately measuring and monitoring results of the proposed burns will be difficult, if not impossible. Much more detail needs to be added to the stated objectives in the Scoping Notice – “maintaining or re-establishing natural ecosystems, perpetuating a mosaic of plant communities, suppressing or eliminating undesirable weeds and wood vegetation, reducing fuel accumulation, improving wildlife habitat, and increasing habitat diversity.” For instance, the types of natural ecosystems, wildlife habitat, and habitat diversity that are to be affected should be listed and described, as well as desired results.

In essence, there is not enough detail provided to adequately assess the proposed project. Fire can facilitate the spread on non-native invasive plants. Fires conducted during spring and early summer can have severe negative impacts on plants and some wildlife species, such as breeding birds, amphibians, and newly born or hatched individuals of many taxa. More information about the frequency, timing, and intensity of the proposed burns is needed to assess these and other concerns.

Thank you for consideration of our comments. Please contact me if you have questions, need clarification, or wish to discuss any of the points that were raised.

Sincerely,



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