Sherman Bamford
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12/13/2011 03:26 PM

To: permitsR3ES@fws.gov
cc: Sherman Bamford <bamford2@verizon.net>
Subject: NiSource Gas Transmission and Storage draft multi-species habitat conservation plan comments - attachments 1

Sherman Bamford

Forests Committee Chair

Virginia Chapter – Sierra Club

P.O. Box 3102

Roanoke, Va. 24015

Bamford2@verizon.net

(540) 343-6359

December 13, 2011

Regional Director, Midwest Region

Attn: Lisa Mandell

U.S. Fish and Wildlife Service Ecological Services

5600 American Blvd. West, Suite 990

Bloomington, MN 55437-1458

Email: permitsR3ES@fws.gov

Dear Ms. Mandell:

On behalf of the Virginia Chapter of Sierra Club, the following are attachments to our previously submitted comments on the the NiSource Gas Transmission and Storage ("NiSource") draft multi-species habitat conservation plan ("HCP") and the U.S. Fish & Wildlife Service ("Service") draft environmental impact statement ("EIS").

Scoping notice for the Barb Timber sale - in or near the corridor:

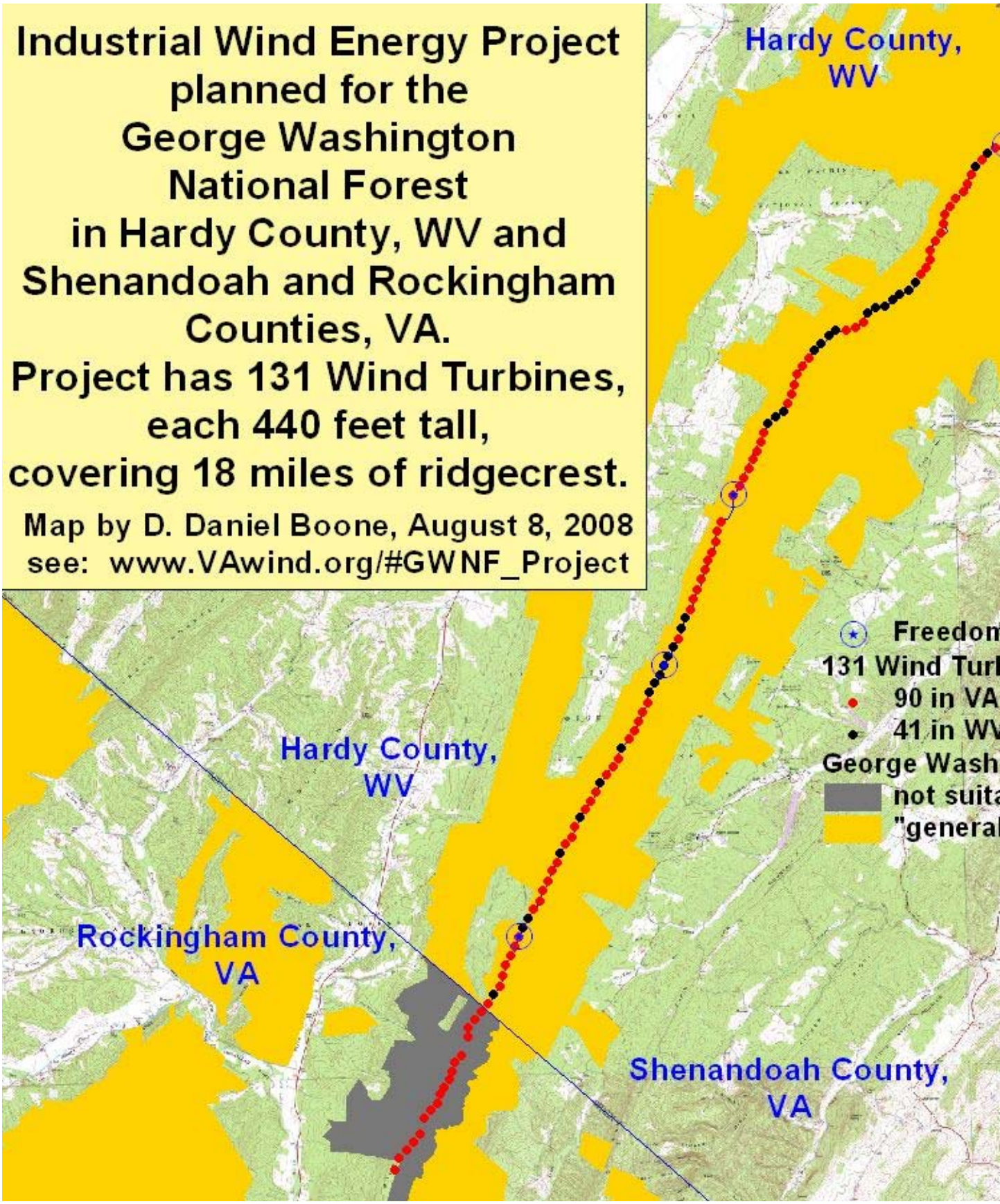
ScopingNotice-BarbTimberSale-07-21-11.pdf

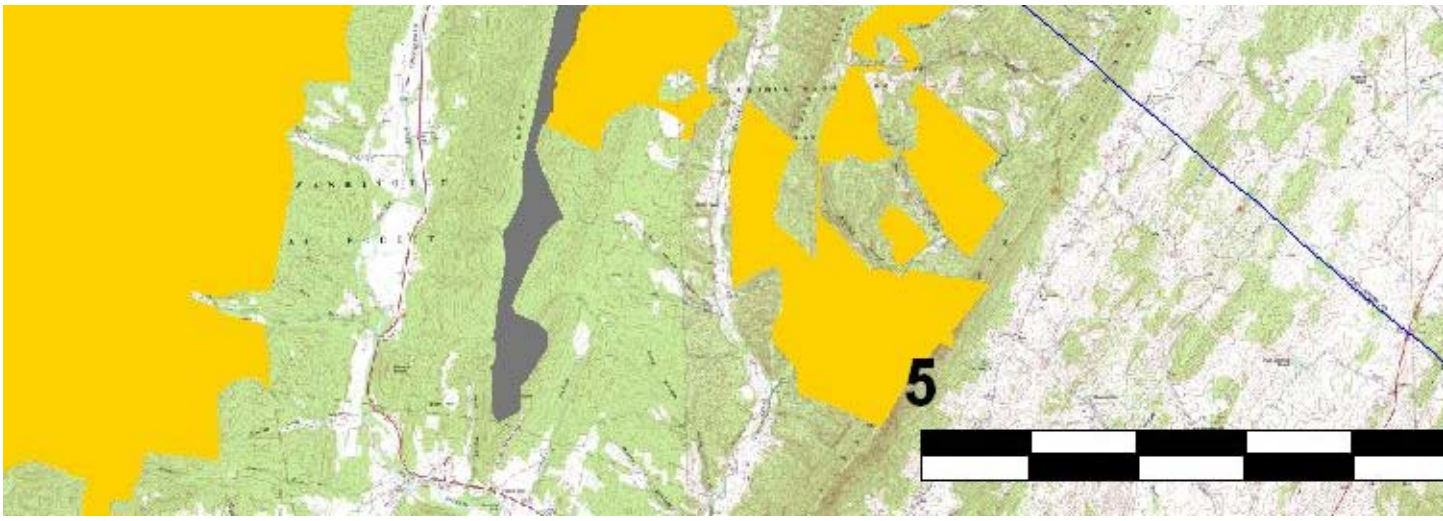
Map of proposed Freedomworks Wind Turbine Site - in or near the corridor

Industrial Wind Energy Project planned for the George Washington National Forest in Hardy County, WV and Shenandoah and Rockingham Counties, VA.

Project has 131 Wind Turbines, each 440 feet tall, covering 18 miles of ridgecrest.

Map by D. Daniel Boone, August 8, 2008
see: www.VAwind.org/#GWNF_Project





Sincerely yours,

Sherman Bamford
Forests Committee Chair
Virginia Chapter, Sierra Club

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July 21, 2011

USDA FOREST SERVICE
George Washington and Jefferson National Forests
Lee Ranger District

SCOPING NOTICE

Proposed Barb Timber Sale
Shenandoah County, Virginia

Comments requested by August 22, 2011

The U.S. Forest Service is considering harvesting timber on approximately 414 acres. This proposal is situated in Compartments 215, 216, 217, 218, and 219 in Shenandoah County, Virginia, along the sideslopes of Great North Mountain. The proposal is located east of Great North Mountain along State Route 720, FDR 1628, FDR 1851, FDR 1854, FDR 1854A, FDR 1726, and FDR 1726A. Compartments 215, 216, 217, 218, and 219 contain a total of 5,761 acres of which 4,137 acres are suitable for timber management.

Proposed Action

The Lee Ranger District proposes to harvest approximately 414 acres (see attached map). Several alternatives will be developed to evaluate various harvest methods using ground skidding on land classed as suitable for timber management. Also, the Forest Service will be considering treatment of non-native invasive species found in and immediately adjacent to proposed harvest areas. Other associated projects may include site preparation for natural regeneration and wildlife and watershed improvements. The proposed harvest areas would be offered over a three to four year period with about three to six harvest areas per year.

Areas Considered for Timber Harvesting

Area	Compartment/Stand	Acres	Method of Cut
1	215/12	25	MSW - Modified Shelterwood
2	215/16	25	MSW
3	215/18,19,20	25	MSW
4	216/4	14	MSW
5	216/5	25	MSW
6	217/13	25	MSW
7	217/15	25	MSW
8	217/23,29	25	MSW
9	218/19	25	MSW
10	218/17	25	MSW
11	218/11,14	25	MSW
12	218/12,22	25	MSW
13	218/12,23	25	MSW
14	218/1,2	25	MSW
15	219/2	25	MSW
16	219/3	25	MSW
17	219/8	25	MSW
Totals		414	

Need for the Proposed Action

Desired Future Condition (DFC) for Management Area (MA) 15 is the basis for evaluating the area for modified shelterwood harvest. Maps of the area are attached for your information.

The proposal would require construction of temporary facilities (temporary roads, skid trails, and log landings) which will be closed and revegetated with wildlife seed mixture following their use. Forest Development Roads will remain and continue to be managed as closed to public motorized travel where presently gated.

Other project opportunities being considered are: 1.) Grassy and herbaceous openings (wildlife clearings) being created; 2.) Waterholes constructed where free flowing water is not present; 3.) Planting soft/hardmast species on log landings and wildlife clearings; and 4.) Treatment of non-native invasive species found in and immediately adjacent to proposed harvest areas.

The Proposed action is needed to meet the direction set in the Revised Land and Resource Management Plan (Forest Plan). The proposal is located in MA 15 (Mosaics of Wildlife Habitat) "that are managed to maintain or enhance habitat for wildlife (wild turkey) favoring a mature forest environment with both temporary and permanent clearings, and freedom from disturbance during nesting, brood-rearing seasons" (Forest Plan, page 3-79). "A sustained yield forest of balanced age classes with a minimum of 60 percent of the stands in mast bearing age is considered desirable" (Forest Plan, Page 79). All proposed harvest areas lie in MA 15C which are MA 15 lands where even-aged regeneration methods are used in meeting wildlife habitat objectives (Forest Plan Standard 15-16, page 3-82). "Strive to maintain 5 percent of the area in grass/herbaceous openings that are well dispersed throughout the management area" (Forest Plan Standard 15-8, page 3-81). Up to four water sources per square mile may be developed if free flowing water is not present" (Forest Plan Standard 15-9, page 3-81).

Forest Service personnel examined the proposal area in 2010 and 2011. The FSVEG data indicates that this area is not currently meeting the DFC. Important differences were identified between the current forest conditions and the DFC for the management area. The following table compares certain key components of the DFC of MA 15 with existing on-the-ground conditions for the proposal area. In response to these differences, the Proposed Action was developed.

HABITAT OBJECTIVES/ Plan Standards	DESIRED FUTURE CONDITI ON Management Area 15	EXISTING CONDITION
BREEDING & NESTING Young Forest (Plan pg3-79,Standard 15-17)	SHOULD NOT BE MORE THAN 10% of area or 414 acres	0 % OR 0 ACRES IN THE 0 - 10 age class
BROOD HABITAT Wildlife Openings (Standard 15-8)	5% or 207 acres	0% or 0 ACRES
FALL/WINTER HABITAT Hard Mast Production Areas (Plan page 3-79)	A MINIMUM of 60% or 2,482 acres	85+% or 3,557 ACRES
YEAR-ROUND HABITAT Water Sources (Standard 15-9)	4 PER SQUARE MILE (4,137/640 = 6.5 sq.mi.) 6.5 sq. mi. x 4 = 26 water sources	Beetle Run,Wildcat Run, Alum Run, Kelly Run, and Anderson Run and 2 waterholes provide water sources

FSVEG data identifies an unbalanced age class distribution within the project area with a majority of the timber stands at or approaching rotation ages specified for this management area in the Forest Plan, page 3-82. In addition, many of these older aged timber stands exhibit signs of wind/ice damage, gypsy moth

damage/mortality, and/or oak decline. The following charts indicate the age class distribution within the project area before and after the proposed timber harvest.

ACRES BY AGE CLASS FOR THE PROJECT AREA

Age class distribution in 2011:

Age Class	0-10	11-20	21-30	31-40	41-50	51-60	61-70	71-80	81-90	91-100	101-110	111-120	121-130	131-140	141-150+
Acres			360	98	122			22	212	236	1,174	1,470	125	94	224
%			8.7	2.4	2.9			0.5	5.1	5.7	28.5	35.6	3.0	2.2	5.4

Age class distribution in 2021 after proposed harvest:

Age Class	0-10	11-20	21-30	31-40	41-50	51-60	61-70	71-80	81-90	91-100	101-110	111-120	121-130	131-140	141-150+
Acres	414			360	98	122			22	212	211	1,024	1,270	125	279
%	10			8.7	2.4	2.9			0.5	5.1	5.1	24.9	30.7	3.0	6.7

Soils are generally stable and would be disturbed (temporary roads, and log landings) on only a small portion of this 4,137 acres of land area. Thus, soil-disturbing activities would occur on a minimal area resulting in no adverse impact to water quality, fish and wildlife, or visual resources.

Visual Quality Objective in the proposal area is Partial Retention. Recreation Opportunity Spectrum for the area is Roaded Natural. No sensitive resources will be affected.

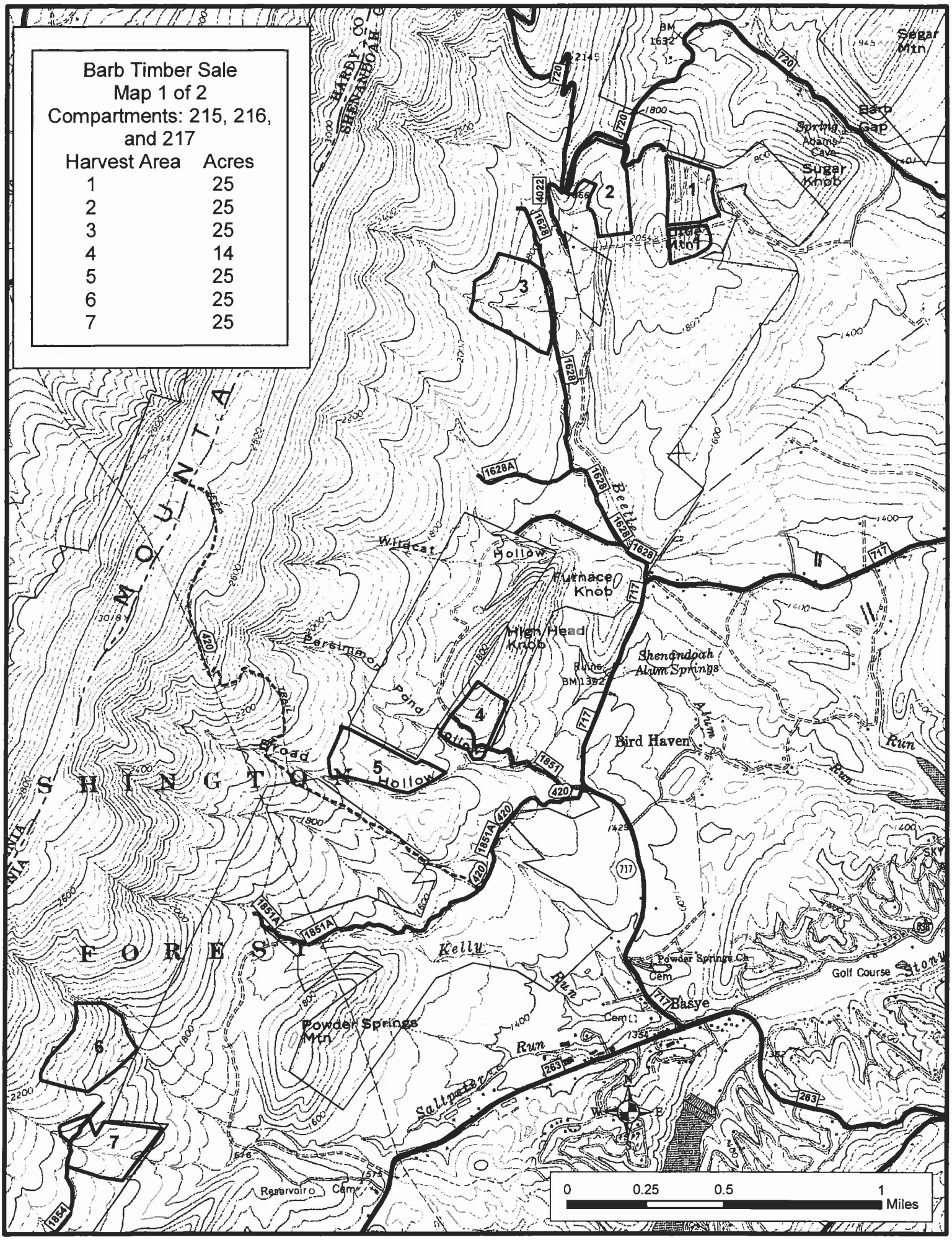
There is no inventoried threatened or endangered species habitat or roadless areas within the project area, however, the project area does contain acres of potential old growth xeric pine-oak and dry oak stands as inventoried through the Forest Plan. Any potential effects of the proposed action on the potential old growth stands will be considered in the environmental analysis.

There are no known controversial or unusual aspects to this project. Similar projects have been successfully completed in the past. This project is viewed as routine, and it is expected that there will be no significant environmental effects resulting from its implementation.

This project is consistent with the management direction, including standards and guidelines, in the Forest Plan as amended.

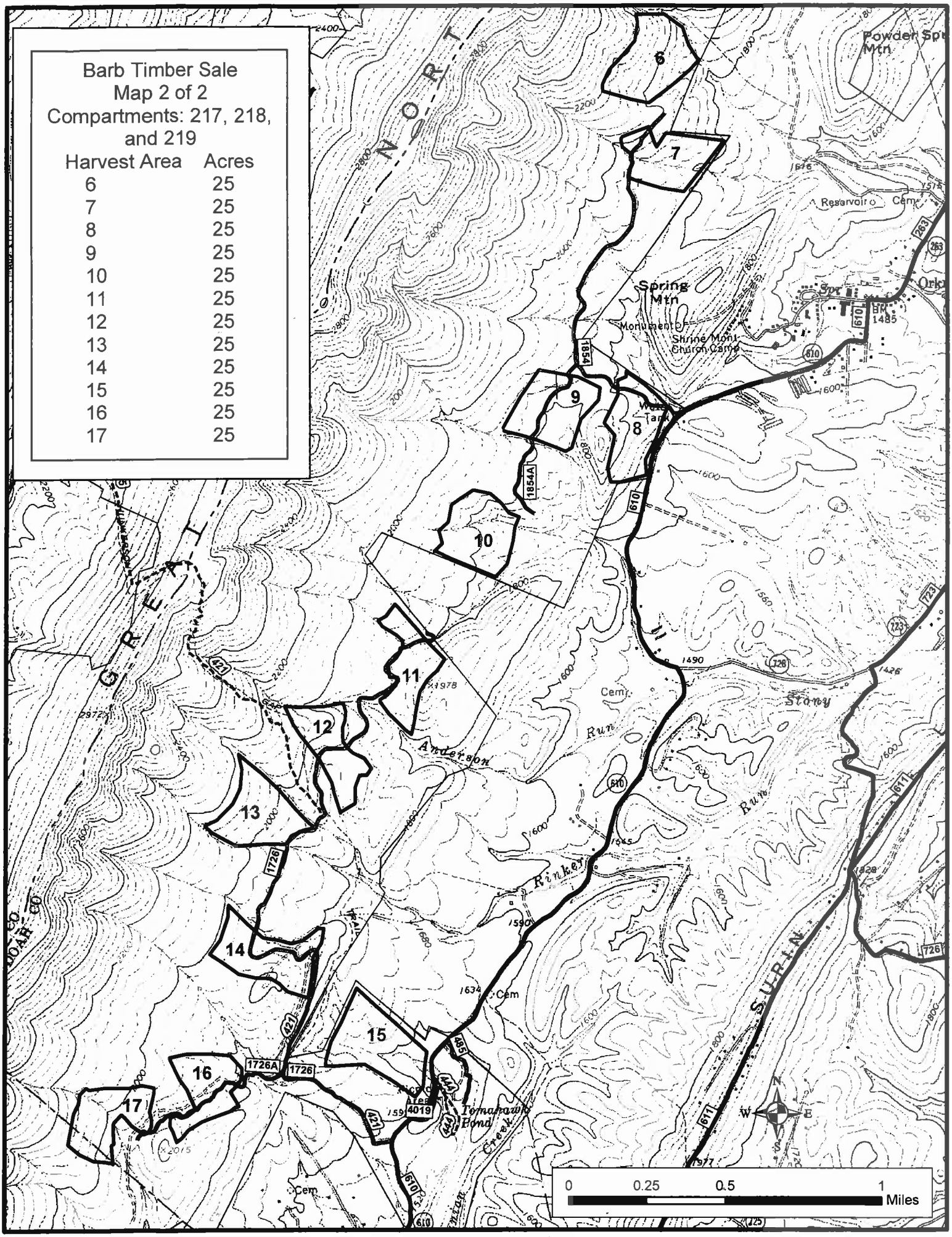
If you wish to express your interest and concerns regarding this proposed timber sale, management of these sites, or simply wish to learn more about it, please contact Holden Mason at the Lee District office before August 22, 2011.

Send your comments to: Lee Ranger District
95 Railroad Avenue
Edinburg, VA 22824
Phone 540/984-4101


Barb Timber Sale
Map 1 of 2
Compartments: 215, 216, and 217
Harvest Area Acres
1 25
2 25
3 25
4 14
5 25
6 25
7 25
Segar Mtn
Barb Gap
Sugar Knob
Furnace Knob
High Head Knob
Shenandoah Alum Springs
Bird Haven
Powder Springs Mtn
Basye
Golf Course
Reservoir
Kelly Run
Saltpeter Run
Beetle
Wildcat Hollow
Persimmon Pond Hollow
Broad Hollow
Powder Springs Ch
Cem
0 0.25 0.5 1 Miles

Barb Timber Sale
Map 2 of 2
Compartments: 217, 218, and 219

Harvest Area	Acres
6	25
7	25
8	25
9	25
10	25
11	25
12	25
13	25
14	25
15	25
16	25
17	25



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