Potomac Appalachian Trail Club

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Director
Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250-1124

Re: Proposed Roadless Area Conservation Rule Rescission (RIN 0596-AD66)

To Whom it May Concern:

I am writing on behalf of Potomac Appalachian Trail Club (PATC) to express support for the Roadless Area Conservation Rule. We are opposed to rescission of the Roadless Rule as proposed by the U.S. Forest Service.

Founded in 1927, the more than 7,000 members of Potomac Appalachian Trail Club maintain 1,300 miles of hiking trails, 49 rental cabins and 45 hiking shelters. We work with 17 national parks plus two national forests, and multiple state and local parks and forests. Our geographical footprint covers 45,000 square miles in the Mid-Atlantic region. We connect people to the outdoors through volunteer service, educational and recreational opportunities.

PATC has a Volunteer Agreement with the George Washington and Jefferson National Forest (GWJ) to maintain trails in the North River and Lee Ranger Districts. These two districts have 12 Inventoried Roadless Areas totaling 154,658 acres. PATC has a vested interest in preservation of roadless areas because our volunteers maintain 61 trails in all 12 of the roadless areas in the Lee and North River Districts in Virginia and West Virginia. These include:

1. Big Schloss
2. Northern Massanutten
3. Southern Massanutten
4. Gum Run
5. Dry River
6. Skidmore Fork
7. Oak Knob
8. Little River
9. Ramseys Draft Addition
10. Crawford Mountain
11. Elliott Knob
12. Jerkemtight

See the attached list of roadless area trails maintained by PATC. PATC has contributed nearly 20,000 volunteer hours of trail maintenance in the GWJ North River and Lee Districts in the past three years alone. The value of our volunteer work for these three years is $722,800.00. PATC's volunteer labor represents a substantial, long-term public investment into the existing recreation

network. Management changes that increase potential road impacts, erosion, or maintenance needs would shift additional costs onto volunteers.

The trails PATC maintains in roadless areas are within a 1-2 hour drive from over ten million people. By maintaining these trails, PATC provides a valuable service to the public in the Mid Atlantic Region. The Forest Service does not have the capacity to maintain trails, making our volunteer work critical to maintaining the existing trail infrastructure, some of which was built by the Civilian Conservation Corps in the 1930's or earlier. PATC's volunteer work includes maintaining trails, cabins, shelters, privies, scenic overlooks, signage, erosion control, and pulling nonnative invasive species (NNIS). Some of our volunteers have dedicated decades of their lives to maintaining these trails and have developed a close connection to the land. As John Muir said, "*Everybody needs beauty as well as bread, places to play in and pray in, where Nature may heal and cheer and give strength to body and soul alike*." Many of our trail maintainers enjoy trail work because it gives them an opportunity to spend time in nature and to give back.

PATC's area of responsibility includes the following long trails that pass through roadless areas:

- **Massanutten National Recreation Trail** – 71 miles
- **Tuscarora Trail** – 250 miles
- **Great Eastern Trail** – 1,800 miles
- **Wild Oak National Recreation Trail** – 27 miles
- **Shenandoah Mountain Trail** – 45 miles
- **North Mountain Trail** – 15 miles

The 12 roadless areas in the GWJ North River and Lee Districts constitute the largest concentration of roadless areas in the eastern U.S. Hikers, bikers, hunters, fishermen, equestrians, backpackers, and other trail users from Pennsylvania, Maryland, Washington D.C., West Virginia, and beyond come to the GWJ for recreation. The trails in roadless areas are among the most popular for their scenic beauty, older growth forests, opportunities to see wildflowers and wildlife and find both challenge and solitude. Our public lands are places where people can have outdoor recreation experiences that promote physical, spiritual, and mental health. They are places where individuals, groups, and families can escape the pressures and stresses of our modern society and feel restored and renewed. For people living in densely populated areas in the Mid Atlantic, these experiences in remote wild areas are especially enjoyed and cherished.

Rescission of the Roadless Rule will harm PATC's interests in the GWJ National Forest in the following ways:

a. **Degrade the hiking experience.** If rescission leads to additional road construction in these areas, it would greatly diminish the natural character that appeals to hikers and other trail users. PATC members and other visitors seek these landscapes precisely for their scenic quality and solitude. New roads would fragment the forest, increase noise and motorized access, and create erosion and maintenance risks. Where these new roads could facilitate development or logging, they simultaneously reduce the recreation value of the area. The

Forest Service must therefore account for these nonmarket values put at risk when evaluating the costs and benefits of rescission.

b. **Degrade wildlife habitat.** Hikers like to view wildlife. Forest fragmentation caused by new roads can degrade interior forest habitat that supports many of the species they enjoy viewing. This could mean a decrease in interior forest birds, salamanders and amphibians, black bear, and other species that thrive in a remote forest habitat. Any action that decreases biodiversity has a negative impact on the beauty and splendor of the natural world that the hiking community enjoys.

c. **Account for scope of public benefits.** Rescinding the Roadless Rule would put existing nonmarket (recreational, scenic, habitat, and watershed) values at greater risk in exchange for increased management flexibility. The Forest Service should consider these potential losses at the rulemaking stage, because the public benefits provided by roadless landscapes extend beyond the impacts of any single project.

d. **Introduce Non Native Invasive Species (NNIS).** Road construction disturbs the soil, and heavy equipment carries in NNIS seeds, giving NNIS a pathway and foothold into areas that previously had only native plants. These NNIS crowd out and outcompete native wildflowers and other plants. The GWJ does not have an adequate budget to fight NNIS. Many of our trail maintainers have attempted to control NNIS along trails but have found them exceedingly difficult and time consuming and often impossible to control. For example, PATC trail maintainers in the North River District organized groups of up to 35 volunteers to pull a patch of Mile-a-Minute (MM), one of the most aggressive invasives in the Mid Atlantic region, along the Wild Oak National Recreation Trail for four consecutive years. Treatment of MM requires a combination of chemical treatment and pulling. The GWJ was able to spray one year, but lacked funding to spray in subsequent years. Despite the volunteers continuing to pull MM, without additional chemical treatment the patch of MM grew back vigorously each year. PATC volunteers concluded that hand pulling was pointless unless the Forest Service could treat the patch with chemicals and decided to suspend group pulls. PATC volunteers had a similar experience spanning several years on Massanutten National Recreation Trail in the Lee District. The combination of hand pulling and chemical treatment was not sustainable, and MM populations continued to expand. The introduction of NNIS changes the forest forever.

e. **Increase difficulty of maintenance.** Road construction, soil disturbance, and logging operations all result in more light to the forest floor. This causes increased vegetation growth and introduction of NNIS, both of which makes trails more difficult and time-consuming to maintain.

f. **More motorized use**. More roads will result in more motorized use of roadless areas. PATC volunteers dig water bars and construct grade dips to divert rainwater from running down the trail and causing erosion. Motorized vehicles that gain access to roadless areas through new roads on steep mountain slopes will loosen the soil and lead to more erosion. If new

roads are co-located with trails, the resulting erosion would be almost impossible to control with hand tools.

g. **More wildfires**. Forest Service research has found that wildfires are more likely to start along roads rather than in the backcountry. More roads means more wildfires, and this puts our volunteers who are maintaining trails in roadless areas more at risk. Even some wildland firefighter groups, such as Firefighters for Safety, Ethics, and Ecology, oppose rescission of the Roadless Rule.

h. **Insufficient law enforcement**. With only two Law Enforcement Officers for the North River and Lee Districts, the GWJ does not have adequate law enforcement to patrol additional roads in remote areas. Furthermore, new roads could increase illegal motorized activity, poaching, and dumping trash..

i. **Inadequate road maintenance**. PATC trail maintainers have reported that some existing forest roads that provide access to trailheads are already not being adequately maintained. Adding more roads in steep, remote areas would carry unusually high construction, erosion-control, and maintenance costs, of which the Forest Service estimated an $8.6 billion backlog in FY 2023. In land management decisions, the Forest Service must consider the full lifecycle cost of any additional road network, a detail all the more important in places with already unmet maintenance needs.

In conclusion, rescinding the Roadless Rule would degrade the natural beauty of our national forest roadless areas and would diminish the rich biodiversity there, thereby decreasing their appeal to hikers and other trail users. In addition, loss of the Roadless Rule would increase the burden of NNIS with no effective remedy. Opening roadless areas to development could ruin one of America's truly greatest treasures – its unfragmented native forests. Generations of people have been recreating in these national forest roadless areas, and these areas should remain wild and available for future generations. Before rescinding the Rule, the Forest Service must fully account for the costs that expanded development could impose on the GWJ and other national forest roadless areas. The Roadless Area Conservation Rule has served for more than a quarter century as a durable safeguard for our nation's finest, undeveloped public land. The Forest Service should not remove that protection without first demonstrating that the benefits outweigh these clear and foreseeable costs.

Thank you for considering PATC's comments.

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Trails PATC maintains in Roadless Areas in the George Washington National Forest Lee and North River Districts

Big Schloss Roadless Area
- Bucktail
- Bucktail Cutoff
- Little Sluice *
- Cedar Creek
- Tuscarora Pond Run
- Tuscarora Three Ponds *
- Tuscarora Cedar Creek
- White Rock
- Little Stoney
- Big Schloss Cutoff
- Big Schloss Access
- Mill Mountain
- Halfmoon
- German Wilson
- Capon

Northern Massanutten Roadless Area
- Sherman Gap
- Buzzard Rock
- Tuscarora Veach Gap
- Shawl Gap
- Massanutten Mtn North
- Stephens
- Botts
- Pig Iron
- Charcoal
- Veach Gap
- Habron Gap
- Milford Gap
- Tolliver
- Canoe Camp
- Indian Grave Ridge

Southern Massanutten Roadless Area
- Second Mountain Trail
- Massanutten South Trail
- Fridley Gap Trail
- Martin Bottom Trail
- Morgan Run Trail
- Pitt Spring Lookout Trail

Gum Run Roadless Area
- Maple Springs Trail

Skidmore Fork Roadless Area and **Dry River Roadless Area**
- Shenandoah Mountain Trail North
- High Knob Trail

Oak Knob Roadless Area
- Hone Quarry Falls Trail
- Cliff Trail
- Blueberry Trail
- Hidden Rocks Trail

Little River Roadless Area
- Buck Mountain Trail
- Grooms Ridge Trail
- North River Trail

Ramsey Draft Addition Roadless Area
- Springhouse Ridge Trail
- Hiner Spring Trail
- Bald Ridge Trail
- Road Hollow Trail
- Bridge Hollow Trail
- Dividing Ridge Trail
- Shenandoah Mountain Trail
- Sinclair Hollow Trail

Crawford Mountain Roadless Area
- Chimney Hollow Trail
- Crawford Mountain Trail
- Crawford Knob Trail

Elliott Knob Roadless Area
- Falls Hollow Trail
- Cold Spring Hollow Trail
- North Mountain Trail

Jerkemtight Roadless Area
- Southern Shenandoah Mountain Trail