TO: District Ranger Lauren Stull, Glenwood/Pedlar Ranger Districts

FROM: Laura Henry-Stone, PhD

RE: Pedlar River North Project #58783 Scoping Comments

DATE: October 13, 2020

Thank you for this opportunity to share public comments about the Pedlar River North Vegetation Project #58783. I live in Amherst County and work as an Associate Professor of Environmental Sciences at the University of Lynchburg. I am also on the advisory committee for the Central Virginia Land Conservancy and have been active with multiple other stakeholder groups in this region that have an interest in our George Washington and Jefferson National Forests.

In 2000, my husband and I thru-hiked the Appalachian Trail through this area, long before we had any idea we’d live here some day. I was thrilled when I had the opportunity to move to the area in 2009, first to live in Rockbridge County and teach at Washington and Lee University for three years, then to Lynchburg, where I lived for the first seven years of my faculty position at the University of Lynchburg. In January of 2019, I purchased and moved to my “dream property” in rural Amherst County, on the border of the Pedlar River watershed and just a ten-minute drive from the AT and Blue Ridge Parkway. Every fall (when there isn’t a pandemic), I take UL environmental science students to the BR Parkway, the AT, and the GW National Forest to learn about public land management. Just a few days ago, I visited the project area and walked a short section of the AT along the Lynchburg Reservoir. In some ways, the Pedlar Ranger District has been at the core of my personal and professional life for over ten years.

To be clear, my personal preference would be to manage the entire GW&J National Forests as roadless wilderness to allow for the forest to manage itself. In this day and age of rapid and dramatic environmental and climate change, the most ethical management policy would be to leave as much of our national forest land intact as possible. We need the ecosystem benefits of such forests to ensure the wellbeing of future generations of humans and non-humans. The aesthetic and mental health benefits of in-tact forests are also among my top values.

However, I recognize that the US Forest Service mandates do not align with my personal preferences, and indeed, I myself appreciate the recreational access provided by forest service roads to areas such as this. Therefore, my comments below stem from a conservation perspective and are guided by the desire to do the least environmental harm possible concerning our national forests, in order to provide balance to what I suspect is the driving perspective for projects such as these--the economic benefits for commercial timber harvesting operations. I would like to trust that the USFS will conduct this project with the utmost care.

To prepare my comments, I have thoroughly read the scoping letter and cross-referenced it with the 2014 GWNF Revised Forest Plan. First, I commend District Ranger Lauren Stull for a detailed and thorough scoping letter that is clearly aligned with the goals outlined in the Forest Plan. I am also heartened to see and support the multiple beneficial “ancillary projects” outlined in item 7.

However, I have concerns about various aspects of this proposed project that parallel quite well the “Summary of Significant Issues” in the Forest Plan (E-14), including the following:

*Access; watersheds, soil and water quality, riparian areas, and aquatic diversity; terrestrial biological diversity; old growth; forest health; fire; recreation; wilderness/roadless; timber harvest; economics and local community; climate change*

I address some of these issues in more detail below, and I suggest that each of them needs to be fully considered in the ensuing environmental assessment for the Pedlar River North Project.

Some of these issues have been partially addressed in the scoping letter, such as minimizing the impact of *access* to parcels scheduled for harvest, especially regarding impacts on *watersheds and water quality*. But the public needs assurance that the USFS will hold commercial *timber harvest* accountable to these guidelines. We also need a full accounting of the projected impacts on *climate change,* in particular a carbon budget associated with this project. We also need to be clear about what types of *terrestrial biological diversity* we are prioritizing over others and why. Hunters are often our most informed and passionate conservationists, but they bring a bias to this project that clearly prioritizes game species. Indeed, the Virginia Department of Game and Inland Fisheries recently changed its name to the Department of Wildlife Resources to recognize that non-game wildlife is as much a part of their mandate as game species. The GWNF needs to be cognizant of these types of shifts in priority in Virginia.

In general, I am also concerned that the Forest Plan and this proposed project do not take into account the management practices on surrounding private property, much of which is managed for commercial timber harvest. While the USFS is not responsible for managing what happens on private property, it is misguided to propose targets for percentages of the forest to be in various stages of succession without taking into account surrounding areas. In other words, there is plenty of early successional, regenerating, late successional, and open canopy forest throughout the foothills of the Blue Ridge Mountains. I would like to see the environmental assessment include a wider landscape assessment of different forest age classes, while prioritizing the protection of the headwaters of Virginia’s watersheds on our national public lands.

Finally, I would like to highlight in particular my concerns with Unit #41, for which the proposed prescription is “CC with SLP Planting” (Table 1. Stands Proposed for Commercial Harvest). On the scoping map (1 of 2), the legend describes this area as “Clearcut w/ Reserves, Shortleaf Pine Planting.” First, I find it disingenuous that Table 1 does not provide a key for the definition of “CC with SLP Planting.” This is the only unit proposed for clear cutting as opposed to some version of selective harvest, all of which are named with complete titles (not acronyms) in Table 1. I find it downright suspicious that this proposed clear cut is obscured in the scoping letter.

Besides that, it is absolutely unconscionable to propose a clear cut at this location, right next to the Lynchburg Reservoir, and within the viewshed of the Appalachian Trail. Unit #41 should be removed entirely from the project proposal. Barring that, the environmental assessment needs to focus very particularly on Unit #41 and adjust it to be more in line with one of the selective harvests outlined for the rest of the project area. Beyond Unit #41, it appears that selective harvest and prescribed burns are being planned carefully and purposefully. As I explain in my comments above, I question the purposes associated with the proposed harvest units and prescribed burns. But if they must be planned, then they must also be equally carefully administered and implemented. I will look for these reassurances in the environmental assessment.

Sincerely,

Dr. Laura Henry-Stone