June 3, 2021

Joby P. Timm

Forest Supervisor

George Washington and Jefferson National Forests

5162 Valleypointe Parkway

Roanoke, VA. 24019-3050

Re: Objection-Pedlar River North Vegetation Project

Dear Supervisor Timm,

The following objection is to the NEPA analysis in the Final Environmental Assessment, Pedlar River North Vegetation Project, Pedlar Ranger District, George Washington and Jefferson National Forests, Amherst County, Virginia, April 2021.

**Issue**: The project analysis falls short in addressing certain requirements under NEPA 5, 1, and 2 as discussed below. (NEPA items are phrased as in Appendix B Response to Comments, part of Final Environmental Analysis.)

**NEPA 5: “The Forest Service should consider other forest values and ecosystem services in development of the purpose and need for this project” (Appendix B PDF p 28)[[1]](#footnote-1)**

 It is evident that “other forest values and ecosystem services” of the slated tracts for timber harvest in this project have not been adequately considered based on the EA economic analysis:

A) The EA’s cost/ benefit comparison re timber sales compares the chosen alternative with the “no action” alternative without including any values associated with ecosystem services (EA p. 99-101).

B) the project’s choice/number of tracts is not adequately justified by project’s “need” or “purpose” when all forest values are considered.

 The EA simply avoids the whole issue by stating, “It is important to note that not all effects can be quantified monetarily. It is difficult to reduce the benefits and costs of a proposed management action on wildlife, soil, water, visuals, recreation or other non-market resources to a single dollar amount. There is no single accepted methodology for such an evaluation, and it is considered beyond the scope of this analysis. The environmental effects of the alternatives on these resources are described and disclosed in the previous sections of this chapter” (EA p. 98).

 A project that affects this many acres in a water supply watershed and proposes activities that span over a decade in time deserves an adequate economic analysis.

**A. The cost/benefit analysis (EA p. 99-101) does not adequately assess or represent other forest values or the ecological costs of the planned timber harvest.**

 The EA economic analysis does not include a cost/benefit consideration for the impact of the harvesting activities on ecosystem services of the tracts that will be affected as well as the impact, overall, of harvesting activities spread across the project area, year after year, for a decade or more. Only timber income is considered in the table comparing the two alternatives. In other words, the cost/benefit analysis of the “no action” alternative is insufficient at best and highly inaccurate at worst. The conclusion in the EA thus, that “No income would be directly generated by Alternative 2 and no value-added benefit to the area or regional economy would result” is unsound. The analysis considers the dollar cost of timber harvest and sale as the only relevant factors in the economics of the project. Also, claims about the timber industry are unsupported generalizations, as is the claim about the extent to which the project will contribute to the annual payroll of local jobs (EA pp 99-101).

 In the economic analysis of the EA, the argument is that “while the agency strives to avoid losing money on a timber sale, it certainly does not implement timber harvesting projects to solely generate revenue. Thus, the determination of which and how many trees to harvest is driven more by the need to achieve the Desired Future Condition for the project area rather than the value of the tree(s) themselves.”

 The “desired future condition” of the project area is supposed to “drive” the scale of harvest, but the future condition of those areas if left alone is not seen as relevant to the economic analysis. Many of the tracts will be in or nearing old growth within ten years if left out of this project. The demand from the public for more old growth and the need for the particular ecosystem services provided by older forests are both increasing, for many reasons. The public wants to preserve old forests, whether they visit them or not, and scientific opinion on their value and rareness is unequivocal. Besides that, much research is now being done on older forests that is highly valuable to human understanding of biodiversity, ecosystem dynamics, and carbon sequestration, to name just a few of the areas of scientific inquiry aimed at uneven-aged mature or old growth forests—forests that are undisturbed long enough to develop extensive root mat connections where biological and chemical networks integrating multiple tree species and fungi proliferate.

 I recognize that the assessments done in the EA are all that is required by law. But the EA’s incomplete cost/benefit analysis falls far short of presenting a fair picture of the potential loss to the forest and the public from the North Pedlar project’s timber harvest activities. The 25 or more tracts of established forest ecosystems have developed structural and biotic integrity only made possible because the areas have been undisturbed for as long as they have. Resilience in a forest comes from under and above ground physical, biological, and chemical connections established over time. Resilient forest communities arise only when left undisturbed by mechanical harvest for many decades within their particular micro and macro contexts. Resilience in a forest takes time to develop, and harvesting these tracts will not be an improvement but a setback to that development.

 The upper Pedlar River watershed’s ecosystem services are significant. Many ecosystem services depend on canopy cover and the character of the canopy structure. The tracts I visited on foot in March and April of 2021 (tracts 14, 15, 16, 17, 21, 22, 23, 24, 25, 33, 40, 8, and 38), which have developed, well-structured canopies. The loss incurred through harvest of those tracts, thus, is not short but long term. What to harvest “should be based on a comparison of the expected monetary value of the timber and the costs associated with the ecosystem goods and services foregone as a result of logging. Unfortunately, when the only benefit considered in the analysis is that of timber industry dollars, any “ecosystem goods and services that do not have monetary values” are not accounted for. The resulting resource use decision, then, ends up serving only a “small, fairly cohesive group of people or the current generation, while the costs of foregone ecosystem goods and services are borne by larger, more dispersed groups or future generations”( [Forest Ecosystem Services: A Review](http://www.truevaluemetrics.org/DBpdfs/EcoSystem/The-Wilderness-Society-Ecosystem-Services-Value.pdf) p. 5). In the case of the North Pedlar project area, despite the fact that these are nationally owned lands and their forests affect many people beyond hunters and loggers, the benefits of this project—timber dollars, the expectation of increasing turkey and deer through early successional landscapes—are small, local, and short term. Meanwhile the services lost due to destruction/fragmentation of mature forest ecosystems are losses that are a cost to the larger community (and, one could argue, the planet) that will last several generations into the future or longer.

 While quantifying the ecosystem services of mature forestland left unharvested is not straightforward like calculating board feet and timber dollars, assessment of a forest’s value for qualities such as habitat diversity, watershed protection capacity, and carbon sequestration in soils, for example, can and has been done in other public lands’ contexts and is a growing part of the conversation about forest management globally.

 I realize that the assessments of biology, hydrology, soils, etc. that have been done in this project are all that is required by law, but even those analyses are not contextualized in the EA as relevant to environmental costs and benefits of ecosystem services. In short, the EA’s cost-benefit analysis does not adequately reflect the economics of the two alternatives. In fact, in ignoring the reality of ecosystem service values, the comparison is oversimplified to the point of misrepresentation.

 One small example of what is left out is the consideration of the rising demand for “natural” forestlands for recreational and human health benefits. This economic reality can be seen regionally by the ongoing increase in use of area AT hikes and the Mount Pleasant Hiking Trails. The project’s scale and choice of timber harvest tracts compromises the “future condition” of the project area, which sits within a region that serves a growing population of nature recreation enthusiasts. The tracts slated for logging are valuable not only for ecosystem services now but for potential public benefit through low-cost trails in the near future, since aging forests are desirable places to be in and become more attractive as old growth forests.

 In all likelihood, if assessed fairly for “non-timber” forest values, the tracts slated for harvest in the North Pedlar project area are more valuable for their current and future ecosystem services than for any gains from conversion to early successional forest or harvest of high dollar timber. These ecosystem services include human health and wellbeing-- locally, regionally, nationally.

 Comments in the record that emphasize other forest values compromised by the project or express that the project analysis has not adequately weighted those values are abundant from Appendix B PDF p. 27 through the end of the document. Examples include 2-11-01 (p. 27), 01-21-01(p. 28), 01-18-01 (p.31), 01-36-01(p. 32), 01-60-01 (p. 33), 01-34-03 (p. 39), and 02-14-02 (p. 41). The subject of the “worth” of the existing forest unharvested is also raised in comments from other sections, examples including 01-55-01, 03,06; 01-23-01, 01-51-02, and 01-28-01 (pp.13-20). See also comments 2-2011- 01 and 2-2010-01 (pp. 54-55), and others in that section related to recreational importance of area due to proximity to Blue Ridge Parkway and Appalachian Trail.

 Below my signature at the close of this document, there is a list of hyperlinks that contain video, images, and descriptions of several tracts I visited, documentation that I obtained while I spent hours walking through them in March and April of 2021. They offer a sense of the character of those tracts as relevant to this objection, but also for the sake of those involved in the decision-making process who have not seen the tracts firsthand. I have not had time to post all of my material, but will be doing so as the summer progresses. A few of the tracts were not in my earlier comments because I had not visited them yet as of the deadline for those comments.

 All the tracts I visited are unique from each other. They are also unique from acres of younger forests adjoining them or visible from the roads and paths one travels to get to the tracts. What makes them unique is their mature forest character, aesthetic and biological richness, and pleasing terrain. They are largely accessible by way of contour paths left from old logging roads and are close to scenic highway RT 60, the Blue Ridge Parkway, or other roads within the National Forest frequented by local and regional outdoors enthusiasts. Several of the tracts flank or drape over ridgetops and, to be harvested, will require extensive road upgrades or temporary roadbuilding, despite the claim in the response to comments Appendix B that “Specific areas where timber harvest is proposed were selected to avoid impacts to resources, considering such factors as presence of old growth, slope stability, and proximity to water features.”

 Responses to comments explain that “Approximately 43% of the project area currently consists of stands exceeding 100 years of age, further illustrating how a significant portion of the project area is moving towards old growth conditions” (Appendix B PDF p. 49). This seems to imply that the fact that the project area is moving toward old growth is the reason to take away the oldest parts of it. One thing that all the tracts I visited have in common is the presence of very large trees, and it seems obvious that the reason they are slated for harvest is those high dollar trees, not any ecological need for them to be cut.

 From my experience in and around the many tracts I visited, the only areas moving toward old growth are those slated for logging. The tracts were completely or nearly surrounded by acreage that was significantly younger and evidently previously logged (a few middle-age class trees rising occasionally from a thicket of eve-aged saplings, mainly tulip poplar; or even-aged young trees thickly stocked and forming a one-level canopy). It became easy to recognize the tracts without the pink ribbons, by noticing not just where the biggest trees were but where the forest had become spacious and multi-structured in its canopy, with a variety of ages and species of trees.

**B. The project’s choice/number of tracts is not adequately justified by project’s “need” or “purpose,” ecologically speaking.** The plan leads to a reduction in potential forests that could be designated old growth at a time when the need for old growth forests is rising as we learn more about their value ([Recent findings on carbon storage in old growth forests](https://static1.squarespace.com/static/5c087e9e4cde7a66033e482d/t/5f5908ed8ea49e78c62fcb57/1599670514807/Wild%2BCarbon%2Band%2BWild%2BForests.pdf))[[2]](#footnote-2). Unlike the approach used by the Glenwood Pedlar District, forestry practice that is based on more recent science suggests that creation of early successional habitat come from conversion of less productive, younger, even-aged stands that require less roadbuilding and remove less canopy, with the larger goal being to preserve natural forest dynamics across wide areas—especially with respect to conserving established forest communities. Though the project aligns with the Forest Plan of 2014, it conflicts with conservation forestry and public opinion in that it aims to harvest older forest expressly, and thereby removes those areas from becoming uneven-aged mature or old growth forests that humans and human health increasingly demand.

Response to comments in Appendix Bstates that The Pedlar River North Vegetation Project’s purpose and need “has been created to address the ecological departure of the project area from its natural range of variation” (P. 27). It also claims that “Watershed health improvements are expected in the long-term as stands are managed for more diverse age classes and resiliency” (p. 30). I object to these claims on the basis of the tracts I visited. All are at or nearing “natural” range of variation, and any lack of that variation comes from the fact that the areas were previously logged. It takes 80 or more years after mechanical disturbance for a forest to begin to establish the integrity and biodiversity of a natural forest ecosystem, characterized among other things by uneven-aged trees. And it is a fact that the forest *tracts as they are at present* provide better watershed protection now and in the future than what the acres will become once harvested according to the project’s plan.

**NEPA 1: “The Forest Service should analyze additional alternatives to the proposed action, including …an alternative which significantly reduces the number of acres harvested or proposed for regeneration” (Appendix B, PDF p. 13).**

 The project has not considered an alternative which significantly reduces the number of acres harvested, which should have been done based on conflicts raised in public comments found under NEPA #1 (Appendix B PDF p. 16-20, for example). The response claims that there is no “identified unresolved conflict” in the proposed action and claims that the analysis has considered reasonable alternatives. The response also states, “We identified no other reasonable alternatives that would adequately address the purpose and need” (Appendix PDF p. 20). However, comments in this section indicate an unresolved conflict over the scale of this project, particularly with regard to a desire on the part of the public to preserve older age class forest tracts. While small reductions to planned harvests were made during the EA process, in its final form, the project calls for a decade of harvesting activities that will result in massive canopy clearing and alteration of forest character on 481 acres (in 17 tracts) of 100+ year age class and 227 acres (in 9 tracts) of 90–99-year age class. In other words, 25 of the 30 tracts slated for reduction are nearing upper age classes and the harvesting will open canopy on those acres to the point of leaving basal area of 15-40 square feet per 44, 560 square feet (that is, at most less than .001% left per acre), “plus reserves” not specified. This amounts to loss of 25 mature forest communities and disruption/fragmentation of mature forest cover in the upper Pedlar River watershed. Additionally, there will be thinning operations for further canopy openings on an additional 300+ acres.

 Though the new landscape (harvested as “coppice or shelterwood with reserves”) still falls under the definition of “forest,” as has been well documented, harvesting will greatly alter the structure and biotic functioning of the existing uneven-aged forest ecosystems in upper age classes. The reduction of forest mast and canopy changes the amount of downed woody material, the incidence of snags or standing dead trees with cavities that provide wildlife habitat, and reduces the canopy cover of the harvested acres, with the result of a homogenized or less diverse forest structure. A reduction in canopy cover also increases the amount of sunlight reaching the forest floor which can reduce the moisture content of the forest. Many aspects of forest health are impacted including a change in local conditions such as air temperature and wind patterns, and an alteration in the behavior and distribution of wildlife species that require the conditions of a closed canopy forest.

 Harvesting fewer tracts would preserve the most ecosystem-service rich, older forest tracts and pay heed to the reality that with the volatile nature of climate change, no plan can reliably predict “future forest character” a decade ahead. Such a plan would respect the changing needs of the forest and public lands’ stakeholders, especially considering that this project’s timeframe spans into what should be the time for the revision of the 2014 plan. As regards the forest planning process, from the USFS Glenwood-Pedlar District website:“Forest Plans establish desired conditions, land use allocations, suitable management practices, objectives, standards, and monitoring and evaluation requirements at a broadscale, strategic level for the next 10 to 15 years. Plans are monitored and evaluated so future management can be adapted when we are not getting the results we thought we would *or new scientific information becomes available”* (emphasis mine). Climate change is definitely a much more understood and dire reality now than we thought it was in 2014.

 The Ranger Response to comments on NEPA 5 (p. 27) include that “The Pedlar River North Vegetation Project purpose and need has been created to address the ecological departure of theproject area from its natural range of variation.” Yet, it was the acreage surrounding the tracts that I visited that was void of natural variation, not the tracts themselves. Thirteen of the tracts I visited were surrounded by acres that had been previously logged. Surrounding acres were even-aged, younger, less diverse in species and canopy structure, and that’s just a comparison about the trees. Since much of the acreage outside of this project’s tracts had been previously harvested in shelterwood or coppice methods, the majority of the trees were the same age, and the landscape did not exhibit “natural range of variation” but instead exhibited the characteristics more similar to tree farms after a clear cut. In contrast, the tracts slated for logging in the North Pedlar project already exhibit a “natural range of variation” far superior to the acres surrounding them. To “address the ecological departure of the project area from its natural range of variation,” then, it makes sense to create early successional habitat from acres in the upper Pedlar watershed that have been previously logged more recently, do not exhibit diversity or developed canopy structure, and do not exhibit “the natural range of variation” the USFS 2014 plan claims to be seeking.

 The response to comments claims “The portions of the project area proposed for mechanical harvest were analyzed in the Forest Plan and allocated to management prescription 13… This prescription area is also the predominant area where timber harvest will be used to create and maintain the ecosystem diversity objectives and where wildlife habitat management activities will be focused for both ecological objectives and recreational (hunting and wildlife viewing) objectives. This proposal attempts to meet those objectives” (Appendix B, PDF p. 17). Basically, the forest plan advocates the use of timber harvest as a way to improve ecosystem diversity and wildlife habitat, but yet the areas identified for harvest in the North Pedlar project are already diverse ecosystems rich in wildlife habitat.

 The response in Appendix B argues for the need for early successional because the forest lacks enough naturally occurring canopy gaps to meet the goals of the forest plan; it indicates that a 2-acre opening minimum is needed to support shade intolerant species, but that small gaps aren’t practical for USFS management. The comments claim that “[Natural] Canopy gaps often do not result in recruitment into the overstory, as adjacent crowns expand to close the gap before recruitment can occur. Many of these stands (approximately 43% of the project area) are over 100 years old and do not contain quantifiable areas of early succession large enough to recruit shade intolerant species into the overstory.” The implication is that shade intolerant species *must* make it into the overstory of the entire forest in the project area and/or that 100-year-old forests will lose value if we don’t open their canopy. But both of those assumptions are linked to a perspective that measures forest value by how much high quality timber it can produce in a given number of years. The research on mature forest communities left undisturbed, in contrast, supports many values for the forest outside of and more important (to more people for more purposes) than productivity as measured through a timber production lens.

 The choice of tracts and large scale (in project activities and timeframe) of this project, thus, seems based chiefly on the ripeness of 100-yr old tracts for timber harvest. To meet the “need for early successional forest,” a wiser alternative would be to harvest fewer tracts over fewer years, for a smaller increase in early successional forest and one that would convert less productive, younger, even-aged timberlands rather than the tracts with high present and future value as established forest communities of 90+ years or more.

 The project should be reduced to harvest only tracts where the harvest will serve the purpose not just of creating more early successional forest but also will improve on what is there now. The robust pulpwood market means trees of any age will reap timber market dollars.

 Comments on record that speak to this desire on the part of the public for a smaller harvest (or none at all) are too numerous to list. A few examples include 02-08-01, 02-10-01, 02-05-01, and 01-52-01(from Appendix B, PDF p. 13-20).

**NEPA #1 “The Forest Service should analyze all processes implemented in this project for climate change impacts.”[[3]](#footnote-3)**

 First, it is known that extreme storms typical of our changing climate have more capacity than ever to create canopy openings, so it is unrealistic to set a goal of converting existing forest cover to early successional by basing the degree of natural canopy opening factors on what has been true in the past. Such storms also make robust canopy cover more important than ever for watershed protection from high-volume rains and damaging winds.

 Second, the response states that “This proposed action will not convert forest land to other non-forest uses, thus allowing any carbon initially emitted from the proposed action to have a temporary influence on atmospheric GHG concentrations, because carbon will be removed from the atmosphere over time as the forest revegetates. Furthermore, the proposed project will transfer carbon in the harvested wood to the product sector, where it may be stored for up to several decades and substitute for more emission intensive materials or fuels. This proposed action is consistent with internationally recognized climate change adaptation and mitigation practices” (Appendix B, PDF p. 42) It also states that harvested wood may “substitute for more emission intensive materials or fuels,” a statement that indicates that harvested trees may end up as wood pellets fueling the controversial wood pellet industry. There is great debate over the emissions impact or carbon footprint of this use of forest resources. In essence, the comments argue that the harvesting of the upper Pedlar watershed’s 100+ year old forest communities makes good sense for carbon sequestration partly because it will convert trees into wood pellets to burn.

 Most importantly, the analysis ignores the differences between types/ages of forests with respect to carbon sequestration.The value of the tracts in this project as living ecosystems demands a more careful consideration of climate change costs and benefits, one that distinguishes between the carbon sequestration capacity of forests of different ages and types (i.e., early successional vs late successional or old growth, even-aged vs uneven-aged; degree of canopy closure). Any action that disturbs established forest canopy and communities—like the tracts in this project—reduces the capacity of the forest at large to be resilient in the face extremes. Project actions will also increase the likelihood of exotic species entrance (warming temperatures making the area habitable for more exotic species is another climate change impact) based on disturbance of soil and canopy layers that timber harvesting activities require.

**NEPA 2: “[USFS] should establish a clear purpose and need for young forests or early successional habitat which considers the broader landscape, including private land, or early successional habitat on FS land that would be created as a result of natural disturbances.…”**.

 Response to comments show that project analysis does not consider land uses “in the broader landscape” or accurately assess the capacity for natural disturbances. The analysis claims that the project’s design is justified by the 2014 Forest Plan and as such is not required, by law, to consider land use patterns on private land inholdings in the project area or adjacent private land (Overall Response to NEPA#2 Concern Statement, PDF p 24-25)[[4]](#footnote-4). Refusing to consider lands that impact the habitat of the project area by way of ecology or simple proximity leads to a skewed assessment of presence of/need for early successional habitat. The analysis also claims that there is no reason to imagine a change in the project area in the future that would create a situation where the project is not appropriate in its goals or methods. Because of the scale of the project through time, it claims prediction power for the next ten years or more despite the fact that we are presently in an era of abrupt climate change that is not going to go away.

 Unpredictable rainfall, wind, and temperature events and extremes mean we cannot reliably base future outcomes on what has happened in the past. As such, projects should be more limited in scope since predicting the consequences of “natural disturbances” to the forest in the next decade is not possible. The USFS website states that “The Forest Service manages the national forests for a number of multiple uses, including recreation, timber, wilderness, minerals, water, grazing, fish, and wildlife” and that the “Forest Service scientists study fish, wildlife and their habitats in order to inform land management and address existing and emerging threats, such as climate change and habitat fragmentation.” Rather than targeting our older forests for timber extraction, it would be wiser to manage forests by way of conservation and study them as they age so as to better understand “existing and emerging threats.” The USFS could partner with local universities and other agencies to monitor maturing forest communities in the upper Pedlar, rather than choosing actions that immediately degrade their existing ecological integrity.

 The tracts I visited were diverse in canopy structure, with trees of all ages and mixed species; the oldest forest tracts had canopy openings created by large trees having come down; all the tracts I saw had obvious habitat richness in depth of forest duff from the area having not been disturbed for decades. There was frequent sign of deer, turkey, bear (boulder rolling, log dig outs too large for a smaller animal, for instance); decomposing down trees and standing snags. There was biodiversity that had developed naturally from the amount of time the ecosystems had been undisturbed by machinery, a diversity and integrity that is what resiliency in a forest is made of.

 Many of the acres in other parts of the project area, acres often adjacent to the tracts chosen for this project, are even-aged, not habitat diverse, and have little depth to the duff. To protect and enhance resilience in the forest, it makes more sense to convert younger, less resilient acres to early succession rather than compromising the forest’s existing resilience by dismantling 100+ year old, habitat-rich, forest communities with existing, improving structural and biological integrity.

 According to the response comments, “The proposed actions occur in management prescription 13- Mosaics of Habitat, which emphasizes active management activities to achieve desired conditions for ecological systems diversity. As noted throughout the analysis, proposed actions seek to retain mast producers such as oak and hickory to benefit wildlife habitat and forest structural diversity. Management prescription 13 is the predominant prescription area on the Forest where timber harvest is used to promote wildlife habitat management activities for both ecological objectives and recreational (hunting and wildlife viewing objectives)” (Appendix B PDF p. 52). However, since the tracts are as old as they are, retaining mast producers at the density the project harvest plans allow (less than .001% basal area left per acre, on average) destroys ecologically rich and structurally diverse forest areas for the sake of converting these landscapes to early succession. That may please hunters, but it sacrifices ecological worth for one small aspect of recreational value. Hunters do not represent the majority of people who desire to spend time in the National Forest.

 Also of note is that USFS acres in the project area that are not part of the tracts this project intends to “regenerate” have largely been managed as timber lands for decades. Much of the North Pedlar watershed has been logged in the last 70 years and contains even-aged timber stands, not “natural” in character, indicating an overemphasis on the timber value of lands over other values, in the past and into the future, despite the forest plan’s stated ecological goals.

 In sum, the response to comments does notadequately explain why the tracts chosen “need” to be cleared--why the values of these mature forest ecosystems are worth giving up to gain early successional habitat when other less valuable acreage in the project area could have been chosen instead.

**Conclusion:** Need for “early successional forest” does not have to be met by way of harvesting hundreds of acres of established forest in the higher age classes, despite the high-dollar timber located in those tracts. Instead, the USFS should adequately account for forest values associated with “no harvesting” by revising the plan to 1) preserve the forest communities whose value is best sustained or augmented by remaining intact, 2) reduce roadbuilding and land disturbing activities in pristine parts of the upper Pedlar River watershed for the sake of the project area’s present and future condition for multiple forest values beyond timber production, and 3) shorten the scale and time frame of the project.

Thank you for considering my objection.



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For photos, video footage, and description of tract observations, see the following URLs:

[Tracts 21 and 22, Charlie Taylor Mountain slideshow video, March 2021](https://youtu.be/o-dHTinOjOk)

[Tract 33, Coleman Mountain, March 2021](https://youtu.be/jTCpqaz0JD4)

[Tract 25, snapshot video 1, April 2021](https://youtu.be/bkReOigwdUk)

[Tract 25, snapshot video 2, April 2021](https://youtu.be/ksU1BwcTkQc)

[Tract 17, snapshot video, April 2021](https://youtu.be/OmdGfQGEHNo)

[Tract 17, slideshow video, April 2021](https://youtu.be/cCBUxGFwKwQ)

[Tract 24, snapshot video panorama, April 2021](https://youtu.be/InmrxokPWOQ)

[Tract 24 slideshow video, April 2021](https://youtu.be/F42eWtCYke4)

[Tract 16, snapshot video, April 2021](https://youtu.be/rUAeIvCS9zg)

[Tract 16, slideshow video, April 2021](https://youtu.be/y41DSvYUkq0)

[Tract 2, slideshow video, April 2021](https://youtu.be/Tyjiyh4RpQE)

[Tract 40, slideshow video, March 2021](https://youtu.be/TNs4DZEhAYU)

[link to YouTube playlist](https://www.youtube.com/watch?v=jTCpqaz0JD4&list=PLSVVaHirFSnPCTSOuiKTX4LhX6AHxJawi), which puts all the above videos into one group, for ease of viewing

1. The Appendix B Response to Comments document did not have page numbers, so page numbers here are based on the PDF format in which I read the file. [↑](#footnote-ref-1)
2. “In a subsequent study, Morrie et al. (2017), found that mycorrhiza soil networks become more connected and take up more carbon as forest succession progresses even without major changes in dominant species composition.” “Old-growth forests are the gold standard: they are the most biodiverse, most stable/resilient, most beautiful/restorative, and best at producing oxygen and storing carbon compared to other forest types. It is urgent that we prioritize protecting and providing equitable access to these precious forests, and recognize the nature service values that they generate.” [↑](#footnote-ref-2)
3. P. 13 NEPA 1: “The Forest Service should analyze additional alternatives to the proposed action, including …an alternative which significantly reduces the number of acres harvested or proposed for regeneration (p. 13); The Forest Service should analyze all processes implemented in this project for climate change impacts.” [↑](#footnote-ref-3)
4. “The proposed analysis of private property is outside of the scope of this project. The Forest Plan was followed to meet the early successional habitat objectives of management prescriptions. The Forest Plan direction applies only to national forest system (NFS) lands. Thus, the Pedlar River North project was developed to move toward the desired condition specific to NFS lands only and is consistent with the Forest Plan.” [↑](#footnote-ref-4)