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<https://cara.ecosystem-management.org/Public/CommentInput?Project=58783>.

Re: Comments on the Draft Environmental Assessment (EA) for the Pedlar River North Vegetation Project

Dear Supervisor Freels,

The following are my comments on the Draft Environmental Assessment (EA) for the Pedlar River North Vegetation Project.

The Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508) for implementing the National Environmental Policy Act of 1969 (NEPA) state that NEPA analyses shall "include the alternative of no action" (40 CFR 1502.14).

The agency must discuss the impacts of each alternative and may discuss those impacts together in a comparative description or discuss each alternative separately. The agency should use the approach that will be most effective in the time available. The agency may contrast the impacts of the proposed action and alternatives with the current condition and expected future condition in the absence of the action. This constitutes consideration of a no action alternative as well as demonstrating the need for the action. (CEQ Guidance, 85 FR 60137-60139, Document # 2020-21044, published 09/24/2020)

The Draft Environmental Assessment fails to analyze the no action alternative sufficiently, either in total or at specific scales: target level (specific unit), project level, watershed (Pedlar River Watershed), landscape level and forestwide. It has also failed to suggest and demonstrate the need for no action. The Draft EA devotes a full three sentences to its description of the no action alternative. (page 21) It misrepresents the no action alternative as the "status quo." Although it is stated "that ecosystems change in the absence of active management" there is no description or analysis of how ecosystems change, what aspects of the ecosystems change, and how these changes improve the quality of the environment and the ecosystem services that are provided in the project area, including but not limited to, benefits to soils, waters, species, carbon storage, climate, and recreation. These are impacts that are both valid and important to full analysis of the project.

The EA fails to document the degree to which natural disturbances have created a mosaic of canopy gaps and early successional habitat through mortality, ice storms, blow downs, aging and increased extremes of drought and flood.

As forests continue to age, these impacts are more common, more widespread and more intense. This is particularly important given the 10-15 year range over which the project may be stretched. In a decade, many significant changes will have transpired naturally that will create an environment different from the snapshot provided in the draft EA.

In failing to fully describe and analyze the no action alternative, the public is deprived of information crucial to a full analysis of the project and its potential environmental impacts.

It is disingenuous to assume that this suggestion and analysis must come from the public. It is the responsibility of the agency to provide this information under NEPA.

For instance, there is a misrepresentation of information vital to an understanding of the project. Site visits on March 3 and March 5 to many of the cutting units revealed that there are numerous regularly maintained wildlife openings in and adjacent to these units that are not considered in Table #1 (page 6) which lists the "Existing % and acres in Early Stage and Structure" in "Cove Forests, Oak Forests and Woodlands, Pine Forests and Woodlands as "0%, 0 acres" The many of the units visited are beginning to demonstrate characteristics of potential old growth with large, old trees, large standing snags, and large downed trees that are nurse logs that provide food and habitat for many species.

There is a disturbing pattern to the cutting units in the project area. The project area is notable and characterized by fairly flat mountain tops and knobs rising above the surrounding terrain, having been weathered by streams and drainages surrounding them. Most of the harvesting is planned for the tops and slope sides, of varying slopes. Many slopesides contain drainages, the headwaters of which are in the cutting units. The tops are uniformly of an older age class than the slopes. As mountaintops they are prone to being fairly unproductive, dry sites, where trees are older than they appear for their size. The ground is littered with large downed trees which are functioning as nurse log habitat. Few have significant root balls, indicating rocky/shallow soils. Lots of sandstone geology. Standing snags and downed trees have created a mosaic of canopy gaps and, as a result, the canopies tend to be multi-storied, giving the area a spacious feeling. Slopes tend to be more densely populated (with the exception of north-facing slopes) and have been logged within the last 50 years (the EA project history data only goes back 15, which is approximately the duration of this project). New roadbuilding tends to be along old roadbeds that are not considered part of the road inventory, despite being gated or tank-trapped. Some of them get administrative use to maintain 2-4 acre wildlife openings either in or adjacent to the unit. The abandoned roadbeds make great trails for pedestrian access and that value is worth noting, given what the new road grading and use will remove the feeling of hiking in the woods rather than on a road.

Unit 21, Charlie Taylor Mountain, is such a mountain. 360 degree views from the top, with ½ mile of new road proposed. The top of the mountain is lovely and flat, a lovely place to spend some time. Of the large trees, many, if not most are stump sprouts, sporting 2-3 trunks. There is lots of evidence of wildlife activity as the crest was scattered with many dozens of deer beds. The north slope of the area will be in plain site of Rt 60, directly across from the Church. We circuited through Unit 22 and returned via the ¼ mile of proposed road along a stream through a hollow with a significant stand of hemlocks with no noticeable woolly-adelgid infestation. The likelihood of that remaining after roadbuilding, logging and increased invasives is slim and none. The circuit was relatively short, perhaps 1 ½ mile and I could not help but note its beauty is similar to Mount Pleasant and the need for more dispersed semi-primitive recreation in the project area.

The new proposed road access for Unit 14 skirts a maintained 2+ acre wildlife opening, crosses a relatively steep drainage before entering the flat saddle on the top of the unit. The impacts to the stream can't help but be significant with sediment and rock entering the streambed and moving downstream. The saddle is only moderately and sloped down to Pedlar Creek Road. The south part of the unit is a mountain laurel thicket of significant density and slope, wondering its age and how much it was damaged or leveled during the last logging of the slopes 70+ years ago.

Unit 23 consists of a large long, flat wildlife clearing, perhaps 4 acres, with some perhaps 30-40 year-old Chinese chestnuts planted on the west edge. There is no mention of that anywhere in the EA. There doesn't seem to be significant timber on the slopes of the plateau, but it is easy pickings from the ready-made loading dock. If there is already 4 acres of ESH here, why the need for more? It already exceeds the forest plan guidelines for the unit.

We also noted that just north of Unit 23 was yet another wildlife opening, this one approximately 3 acres with a sign that in 1969 Autumn Olive was planted for wildlife. Yup, it was all around the perimeter, providing food and seed dispersal throughout the forest edges where clearings and roads have been built or maintained. Past forest management has resulted in autumn olive, ailanthus, microstegium and numerous other invasives to find new niches in the forest. That the EA assumes that further intrusion can be mitigated by cleaning trucks is laughable.

Unit 33, Coleman Mountain is so significant that the road on both sides of the Parkway is named for it. Roadbuilding that parallels the parkway looks to be 1/3 of a mile. The roadbed was littered with treetops from a recent icestorm which has significantly reduced the canopy cover. I would suggest that some analysis needs to be done on this to see what the conditions are after leaf-out.

This is exemplary of the mountaintops in the project area. They are multistoried due to regular canopy gaps from large, dead old trees, standing or fallen, icestorm or windthrow. Slopes tend to be more densely forested, younger and less diverse, the result of earlier clearcuts.

The peak on Coleman Mountain is simply spectacular but it is another unproductive site with lower age class trees down the slopes. Older trees are mostly on the top. Many canopy gaps allow the understory that contains a healthy, large population of berries, which I believe are raspberries. This is in stark contrast to managed wildlife opening which are devoid of berries. This unit is in plain sight of the Blueridge Parkway and the Appalachian Trail. Visitors using either method of transport should be spared the viewshed of a clearcut mountain. Another large wildlife opening just down from the top has recently seen some gravel laid.

Why the mountaintops are targeted for the majority of the logging is unfathomable. These areas are sparsely populated with larger, older oaks primarily and uniformly these areas are beginning to naturally move towards old growth conditions. Removing the largest, most mast-producing oaks will reduce the oak component and the means for long-term oak sustainability on these ridgetops.

I take issue with the agency's definition of old growth as defined primarily by age class of individual trees. True eastern old growth forests are certainly characterized by old trees, but they are sparsely distributed with a multi-story canopy, and mosaics of canopy gaps from large fallen trees. On mountaintops with thin rocky soils, pits and mounds are rare as opposed to cove forests, but there are no shortage of nurse logs. My understanding is that there are no old-growth ecosystems in the project area. True old growth is then perhaps the rarest of habitats in the project area. Management proposed in areas that are beginning to display old growth characteristics, as are these flat mountain tops, demonstrate why, unless the public steps up to protect them, the agency will be happy to prevent these conditions from emerging through natural succession. The agency can do so much better here.

The discussion of old growth in the EA is similarly biased towards logging. Note that the forests that we have today are the results of landscape-wide clearcutting that denuded the ridgetops, hills and hollows and the landscape-level fires that followed at the beginning of the 20th century. The oak component of the forests that followed were inflated due to these man-made catastrophic conditions. Natural succession brings them to a more stable and somewhat reduced percentage of the forest. Are these the forest conditions that the forest plan allows to pass for management and restoration? Is it a coincidence that this project consists of ridgetop virtual clearcuts followed by burning? Have we learned anything from the history of our forests besides cut them before they die and follow the money? Can we look back to the forests that preceded these conditions: old, self-sustaining forests with huge trees, carbon storage that is almost unimaginable in today's fragmented and logged landscape, native brook trout, ecological biodiversity with large carnivores securely at the top of food webs and natural buffers that make landscape level fires virtually impossible.

The other issue is recreation. Mount Pleasant's overuse speaks to the fact that the public is hungry for primitive, dispersed, accessible scenic beauty and the peace and soul restoring powers of natural, unmanaged forests. Again, the logging of these areas demonstrates the lack of planning and foresight of the agency to provide those resources and habitat simply not available elsewhere. These areas are proximity to the Blue Ridge Parkway, Mount Pleasant, and the Appalachian Trail. Brief, accessible trails in these areas would increase the value of these areas, adding to the use and appreciation of these areas by the public.

Also note that logging of these areas provides zero stimulus to the economy. There is no shortage of timber supply in the region. The 1991 Final Environmental Impact Statement for the George Washington National Forest Revised Land and Resource Management Plan notes that "the amount of stumpage offered on the forest is a small percentage, 8.5%, of the total stumpage sold in Northern Virginia and adjoining West Virginia (I-143)". It is "...a relatively small volume of timber offered from the GWNF" (I-142). When the agency provides roads, access, follow up and administration, the bid price and return to the agency is depressed, similarly depressing timber values and return throughout the area. "Timber from private lands is usually of better quality than that from the forest. This is because private land generally has more productive sites. Logging costs are usually less because it is more accessible. Both factors lead to higher stumpage values for timber off private land." (I-122, 1991 Final Environmental Impact Statement for the Revised Land and Resource Management Plan, George Washington National Forest, January 1993). These subsidies decrease the value and return to private landowners and pressures them to manage their lands in a less sustainable fashion. Everybody, the agency, the landowner, the public loses. Nobody wins.

I'm not being overly critical here. I have tracked projects in the GWNF for 35 years and participated in the 1991 and 2014 planning processes. The 2014 Plan, which lays the template for age classes across the forest and encourages projects like the Pedlar River North "because we can," is, in this instance, a disgrace to the best available science. The 1991 Final Environmental Impact Statement for the Revised Land and Resource Management Plan, George Washington National Forest, January 1993 includes analysis and information that the 2014 plan lacked which conveniently hid many facts. Alternative 3 in the 1991 plan, which was basically the "no action alternative" forest-wide which would have set aside the majority of the forest to be left to natural processes and natural succession, would have, across the spectrum of 14 alternatives:

- *Minimized Management Costs and budget (2-83)
- *Maximized old growth acreage within 50 years (2-44, 3-164)
- *Eliminated below-cost timber sales (2-49)
- *Maximized Visual Quality Objectives (2-65)
- *Minimized annual sediment loads (2-74, 3-149)
- *Minimized soil erosion (2-75, 3-11)
- *Provided the greatest protection for fisheries (3-41)
- *Allowed naturally occurring fires to burn and create mosaics of early successional habitat (3-125)
- *Minimized habitat fragmentation (3-165)
- *Maintained the carrying capacity of populations of bear, deer and turkey (3-173)

Opportunity, lost.

It is of note that since Alternative #3 was basically "the no action alternative" and was fully analyzed in the 1991 Forest Plan EIS, one begs to ask, why this analysis is glaringly missing from NEPA project analysis?

The information on below cost timber sales was so damning that the agency soon thereafter stopped accounting for the timber program and began dispersing logging costs out to different line items (habitat management, restoration, etc.) that obfuscate this information. Little has changed except the accounting. These were before the days where air quality (compromised by particulates from prescribed burns) and carbon storage were considered part of the NEPA analysis.

Recent science is clear on the value of unmanaged forests that move naturally towards a state of old growth. The absence of analysis on the no action alternative, obfuscates this fact.

When a forest is logged, carbon that would otherwise have been stored in the forest is emitted. Natural forests are best at soaking up carbon from the atmosphere and the older a forest is, the more carbon it will absorb and store, if left standing .

Wood does store some carbon even after it is chopped down, but much of that is quickly lost into the atmosphere in the manufacturing process, when wood is used as building material, chopped into plywood, or burned as fuel. Down woody debris and snags continue to store and slowly release carbon while creating habitat for hundreds of species of insects, mammals, amphibian, pollinators and decomposers while they act as nurse logs for maintaining the future of forests. Logging is the largest source of carbon emissions from US forests, according to research published in 2016, with the largest amounts coming from the Southeastern United States.

It takes decades for a forest to grow. All that time it is transferring carbon from the atmosphere to the land. When a forest is cut, it releases carbon that took decades to absorb, carbon that is best kept out of the atmosphere.

The older a tree gets, the more carbon it can absorb and store. That means that projects like this need to not only protect the old forests but also allow the young forests to grow old. It also means that protecting forests that are already established is one of the most effective strategies when it comes to slowing extreme climate change.

The carbon assessment mentioned in the EA for the Pedlar River North Project ignores one salient fact: There are many objectives of forest management. If the carbon costs of management objectives are not recognized then actions to counter or reduce these costs can not be developed or implemented. This is why an accurate carbon analysis of the no action alternative is so critical.

This project is an example of how the protection of forests from logging is as vital to solving the climate crisis as phasing out fossil fuels. As your own analysis in the 1991 Forest Plan EIS attests, protecting existing natural forests is also the best strategy for shoring up natural flood control, and ensuring stable supplies of clean drinking water and protecting biodiversity. Projects need to reflect the reality that standing natural forests are our communities' best natural defense.

Finally, there is the impact that the no action alternative will have on the Lynchburg Reservoir. No action protects the watershed in ways that timber management and prescribed burning cannot. The 2014 Forest Plan identifies the Lynchburg Reservoir/Pedlar River Watershed as a Priority Watershed with "exceptional waters" but is "at risk" (Revised land and Resource Management Plan, George Washington National Forest, R8-MB 143 A, November 2014, D-1). 60% of the entire 21,837-acre watershed are within the GWNF. The other 40% is in private ownership, where watershed protection is not a priority. Looking at the entire watershed at the landscape level, given the development and agricultural nature of so much of the area, there is no shortage of early successional habitat in the watershed. This is clearly why these waters are considered "at risk". Yet the Pedlar River North project area is 12,073 acres, which makes up more than 93% of the entire GWNF area within the watershed. It is a violation of the public trust to create conditions throughout the watershed that further compromise the quality of the watershed and make its waters even more "at risk". Increased erosion from road building and grading, skid trails, heavy equipment and logging trucks and the resulting sedimentation of streams will inevitably add to the sediment load of the reservoir, resulting in increased need to filter water and dredge and remove the sediment. The watershed, left to its no action alternative, provides preventative water quality benefits at no cost.

In conclusion, the Pedlar River North Vegetation Project Environmental assessment fails to sufficiently analyze the No Action Alternative and therefore fails to consider this information in its project review. The project should be halted until this analysis can be completed and presented in a new environmental analysis and EA.

Thank you for the opportunity to comment.

Sincerely,

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