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Title:

Comments: To Whom It May Concern:

We the student members of the Lynchburg Environmental Sustainability Society (LESS) at the University of Lynchburg wish to express grave concern over the proposed action involving timber sales near the Pedlar Reservoir. The Forest Service's responsibility to future generations, on whose behalf we speak, mandates consideration of the following, as the matters discussed below directly impact both the present and the future of the forest and its beneficiaries.

Among the negative environmental impacts are the following:

Erosion and sedimentation of the Pedlar River watershed, especially in areas immediately adjacent to the Lynchburg Reservoir

Improper management of prescribed burns, leading to extensive forest damage (e.g. the Blackrock Gap burn in Shenandoah National Park)

Reduction of the potential for old growth habitat to emerge and for species dependent on such habitat to thrive

Making the forest more vulnerable to the predicted impacts of climate change in this area, in particular severe storms that create extreme wind and torrential rainfall

The significant carbon footprint created through the burning and removal of vegetation, the burning of fossil fuels to power heavy equipment, and the potential increase in vehicular traffic on expanded Forest Service roads

Intrusion of invasive species into areas that will be highly disturbed from harvesting, burning, and road building

Additionally, we have the following concerns:

Negative impacts to the viewshed of the Appalachian Trail. This is one of the most beautiful stretches of the AT in Virginia, and the project will severely compromise it.

Reduced recreational value for non-motorized use of Forest Service roads

An over-emphasis on wildlife species for game hunters at the expense of other wildlife species valued by other types of recreational users, such as birdwatchers, mushroom hunters, and anglers. For example, the current older hardwood forest harbours a vast array of both breeding and migratory birds, whose habitat will be destroyed for years to come.

Unethical removal of old trees in a day and age when we need to preserve as many of these trees as possible for future generations

Finally, we are gravely concerned about your expressed need for "early successional habitat":

--it is widely available in other areas of the forest that have been managed through consecutive logging in the

past twenty years for that same goal

--clearings and early successional attract edge species of birds, which outcompete the more endangered species that need unfragmented, older forests.

--What's already there is already growing forestland with a well structured canopy with diverse habitat supporting diverse forest species (plants, animals, fungi, etc) as well as protecting water quality, aiding groundwater retention, along with providing flood mitigation and soil conservation. Both clearing and burning threaten these functions.

-- "even-aged" forests are not the best equipped to support biodiversity, but USFS forest plans want to clear areas to make them that way by way of high impact intervention, to best serve the timber industry at the expense of broader, arguably more important for the most people, forest functions.

---conventional, high intervention forestry science is proposed here, which advocates opening canopy through patchwork clearings. This approach doesn't adequately address the new climate (extreme winds and heavy rains) or invasive exotics (which an open canopy invites and where broad spectrum herbicides are not appropriate to use).

--The path out for logging trucks for many of the parcels is steep (erosion impacts), crosses streams (with sensitive species and substrates), such that the logging operation overall degrades the ecosystem even just in the act of it happening at all.

--The value of that land uncut and unimpacted is far greater to the larger world of people, plants, animals, the climate, water quality, soil integrity.

When we consider these deleterious effects against the dubious benefits, this action is unconscionable. Please scuttle this ill-conceived plan.

Sincerely,

Evelyn Brunelle and Hannah Pine, Co-Presidents - LESS