Data Submitted (UTC 11): 10/14/2020 3:00:53 AM
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Comments: RE North Pedlar Vegetation Project Proposal
Based on the project description, timber harvesting activities will convert 29 units (totaling approximately 746 acres, age class of trees 79+ yrs, with most over 100 yrs) into early successional "forest." The tracts are of varying sizes, but mostly around 40 acres, and are peppered throughout the forest in the Pedlar Glenwood District, some near county roads, most accessible by way of miles of interior forest service roads or planned temporary roads. While there is a plan from 2014 to justify this timber-industry approach to management, I object to adhering to such a plan when in 2020, the situation forests and people face means that those acres have a much higher value unharvested. In other words, the National Forests should be managed to serve the highest value for the most people for the longest amount of time.
I have lived on sixty acres of forestland in Amherst County, close to the national forest and surrounded by hundreds of acres of private forestland and farmland, for the past thirty years. During that time, I have witnessed dozens of timber harvests of varying scale on both public and private land. From 1997 to 2011, I also engaged in water quality monitoring in the Pedlar River watershed and directed stream study field trips in Amherst and Bedford Counties and the City of Lynchburg. I learned the value of forests to the streams and rivers that run through them first hand. I understand how forests differ from tree farms, and I know how rare mature, diverse forestland is in this part of the world or anywhere, for that matter. My main objection to North Pedlar Vegetation Project is that it prioritizes timber interests (as the 2014 plan directs) and in doing, this plan goes against the public interest and the ecological health of the forest in 2020 and beyond.
Based on the proposal language, timber extraction will take 40 to 100 percent of the canopy in the cutover areas, depending on the parcel, remove nearly all trees, and in thinning operations, remove dead or dying trees as well as young trees that are not of the desired age class. It is important to recognize that whether termed clearcut, shelterwood or coppice, the issues of impact as described in these comments are basically the same since those methods leave, at best, no more than .09% basal area (common term used to describe the average amount occupied by tree stems) per acre cleared. It cannot be denied that any harvesting process that clears that much of existing vegetation negatively impacts the forest floor and the forest's ability to provide soil/water protection. In other words, harvesting timber as proposed works expressly against more important forest functions that are increasingly recognized as integral components of sustainable forest management. Instead, forest management in 2020 should prioritize vital forest functions such as health and well-being for humans and forest dwelling species, biological diversity, maintenance of ecosystem services (soil and water protection/conservation) and the mitigation of climate change impacts.
Removing the listed tracts of timber would cause a disturbance to mature forest communities and reduce the capacity of the forest to serve the many other functions it is already serving. In the areas under consideration, one of those functions is as habitat for resident and migrant species-from forest floor to high canopy dwellers---that require unfragmented forest to survive. This proposal amounts to fragmentation of mature, unfragmented areas of the GWJ National Forest. Large holes in the forest interior created by newly cleared land cause problems immediately and for decades. Fragmenting negatively impacts species with large home ranges (e.g. bears, large carnivores), species unable to disperse easily (e.g. many amphibian and reptile species), and habitat interior species (e.g. forest songbirds, many of which are threatened globally by loss of mature forest habitat). Edge and field species of birds will be invited in and outcompete, as they are known to do, the forest birds. This impact extends into the perimeter of each clearing's edge as well. I object to the notion that the GWJNF "needs" more early successional habitat for the above reasons and because early successional forest is the dominant landscape outside the National Forest. Creation of that type of habitat does not help to justify intentional fragmentation through harvesting mature timber.
If the forests slated for logging in this proposal were left to manage themselves by aging naturally, they would become more valuable over time for what they can do as intact, dynamic forest rather than as board feet of timber sold. The parcels that have been allowed to grow into an age class topping 80 years have the capacity to

mature further as they support many species, protect water quality; and, because of the intricate network of underground roots and fungi and the canopy cover they've been allowed to develop, they can help mitigate the climate change impacts of heavy rains and strong winds. These are not trees but ecosystems. For the tracts slated for harvest in the age class 80 yrs+, their highest, best value to the most people for the longest time is not as board feet of timber. It is in how they benefit the planet by way of canopy integrity for forest species, water quality, groundwater infiltration, carbon sequestration, flood protection, and by way being soil-building ecosystems that support biodiversity from the ground up to the tops of the oldest trees.

In short, the amount of money that may be gained by the USFS and the timber industry from timber extraction is far less than the size of the loss we incur if these areas are cut. The loss of ecological integrity-short and long term--incurred by the removal of so many large trees from so many tracts of maturing forests within a handful of years is not quantifiable. In this era of climate change, deforestation, loss of species diversity globally, forests like those named in the proposal are or are becoming one of the most valuable and most endangered habitats globally.

I realize that many if not all of the older forest tracts have been managed in the past to become even-aged, to be harvested now. In today's world, continuing that approach to management is no longer ethically sound. More and more, publicly-owned forest land is managed as tree farms, even-aged timber parcels, or burns up in wildfires caused by unwise previous forest planning. The best plan for the North Pedlar forests is that which allows for the highest, best use for the most people. Based on what we know now (locally, regionally, and nationally), that plan would be for those areas to be remain unharvested.

What is at issue in 2020, as well, is that harvesting this timber as proposed would reduce the land's capacity to serve the public in the way that only older forests can-as places to visit and receive the therapeutic and health benefits that being in a forest, a natural forest, can provide. They are the kind of forests that people can walk through; they support a diversity of plant, animal, and other species-from fungi and microorganisms to threatened birds of species that require an uninterrupted forest habitat, something the country and the world has less and less of by the year. In contrast, the timber harvesting process disturbs the biological integrity of acres immediately and for years. It changes the impacted areas utterly and swiftly, stressing the ecosystem on all levels. The changes may benefit deer, turkey, hunters, and the timber industry, but they do not serve the majority of the population-human and other than human-that would benefit from forests being left alone.

The photographer for the News&Advance article (Oct 3, 2020) said to me as we walked in tracts 12 and 13 that she had never walked in a forest where there was no trail. She said this as she stepped carefully through thick decomposing leaves and over branches to photograph trees larger than she'd ever seen "growing wild." How many young people, during the Covid crisis and other pandemics that will follow, will have a chance to find peace in a place that looks, smells, and feels like a forest, one that isn't loaded with other people in search of solitude and who have nowhere to find it?

A far less damaging management approach, especially for parcels near existing roads, would be to create a footpath based on old logging roads already there, the width of a human not a vehicle. This would both retain the forest's capacity to mature on its own terms and allow for those lands to benefit humans by way of therapeutic benefits: the healing impact of time spent in a diverse, naturally growing forest. There are two things we can be sure of: that such places are in demand and that in the future they will be harder to find, especially if we continue to prioritize the timber products of National Forests over its many other values.

When a parcel has been free of machinery and chainsaws for decades, when it is home to a majority of trees in an age class of over 80 years and of varying species, it has developed an ecological integrity, uniqueness, diversity and health benefiting all the beings that live in it or visit it. Unlike newly cleared forest, it has better resilience in the face of climate change, exotic species, and other threats that are common now. Logging such a place would erase all that. It would induce change at a speed and scale that doesn't mimic any natural disaster, and it would require the land to start over. In today's world, the likelihood of those acres growing into anything as rich as they are today is not nearly as probable as it may have been twenty years ago.

We can't buy these forests back. It is wrong to assume that the existing trail systems that provide access to the few protected forests in the GWJNF will sustain a growing population when so much of the natural world continues to be managed primarily for resource extraction. In 2020, ecological reality should be the lens through

which we view what's left of our forests and ethics should have a place at the table. Forest management is much more than an economic issue.

Thank you for your time spent reading and considering my comments and all those submitted during this process. I appreciate the important work you are doing on behalf of our public lands.