Data Submitted (UTC 11): 9/4/2024 3:15:32 AM
First name: Benjamin
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Organization:
Title:
Comments: In Re: Spruce Restoration Project
The precise original extent of Red Spruce forest at high altitudes on land now part of National Forest is unknown, and probably unknowable.
Equally unknowable is how it would be functioning today, if it had not been clearcut in early Twentieth Century. The clock cannot be turned back.

The highest altitudes of the Appalachian National Forests are now well-regenerated with diverse maturing tree cover, and understorey species, which are providing stable ecosystem services including carbon capture, erosion control, and aquifer protection, as well as habitat for numerous beloved and economically important animal species.

Especially given the largely disastrous history of human interventions in natural ecosystems, it is impossible to predict, let alone quantify, any improvements to current conditions that might result from the extensive new intervention contemplated in the RSRP.
It is not possible to predict how red spruce will or will not thrive as climate and other conditions continue to change over time. To the extent that soils conditions have been permanently altered by historical human intervention, full restoration of pre-European-colonization forest conditions is likely to be impossible.

Furthermore, huge acreages of the highest-altitudes in the Appalachian National Forests are currently occupied by Red-Spruce-dominated forest communities. For this and other reasons, the incremental value of attempts to increase this area, especially at the expense of naturally-well-established mixed forest communities, is unquantifiable, and likely to be negligible.
Given the unknowability and unquantifiability of any supposititious improvements that might result from proposed interventions, benefit-cost ratio cannot be established, therefore expenditure of public monies on this project cannot be justified.

Lastly, any highly-speculative and likely negligible benefits that might accrue from efforts to increase Red Spruce dominance at high altitudes, cannot justify the introduction of poisons into the highest portions of our precious watersheds: use of any form of herbicide or pesticide in our precious and delicate forests, where they will inevitably contaminate every aquifer, MUST NOT be considered nor tolerated.

My family owns land directly downhill from areas of the Monongahela in Pocahontas County, West Virginia. My family drinks the ground and surface water that drain from this area, Furthermore we operate organic farming and medicinal herb-growing and wildcrafting
 that depend completely on the purity of the environment. Any use of herbicides on or near our water- and air-sheds would be a direct assault on our lives and livelihoods. We respectfully demand that chemical use in these areas be removed from consideration, and if it is not, we will oppose it by all available means.
Thank you for your responsiveness to our concerns.