

Susan Plank

March 19, 2020

Reviewing Officer Joby P. Timm, Forest Supervisor GW & J National Forests  
and Mary Yonce, District Ranger, North River Ranger District  
5261 Valleypointe Parkway  
Roanoke, VA 24019-3050

SUBJECT: North Shenandoah Mountain Restoration and Management Project

Dear Joby P. Timm and Mary Yonce,

As stated before, I am a concerned Rockingham County resident living at a private residence within the Feltz Ridge/Leading Ridge Working Area in George Washington National Forest and still appreciate the opportunities to attend the Forest Service informational meetings and make comments. On page 2 of the North Shenandoah Mountain Restoration and Management Project Draft Environmental Assessment Comments and Concerns I see that you noted my support for the North River District for the work done on the North Shenandoah Mountain Project. I have read the Draft Decision Notice North Shenandoah Mountain Restoration and Management Project U.S. Forest Service North River Ranger District GW & J National Forests Rockingham County, Virginia and Pendleton County, West Virginia; the North Shenandoah Mountain Restoration and Management Project Draft Environmental Assessment Comments and Concerns; and the USDA Environmental Assessment North Shenandoah Mountain Restoration and Management Project Rockingham County, Virginia and Pendleton County, West Virginia and still have some concerns.

## **I. Feltz Ridge/Leading Ridge Working Area**

### **A. Water Quality of my well and others downstream of the Feltz Ridge/Leading Ridge Working Area**

As mentioned before in my other comments, some of Virginia's already impaired streams and rivers have their start in the GWNF. I also mentioned, "Brad White, Groundwater Geologist with the VA Department of Environmental Quality informed us that there is not enough known about how water moves in western Virginia's folded rock mountains, the hydrogeology of the Appalachian Plateau. ... Brian Benham, VA Tech Biological Systems Engineer, at the same workshop showed us that western Virginia with fractured bedrock and limestone (Karst) geology where groundwater travel times are shorter, land use activities further away may impact water quality." Due to uncertainty of where and how fast water travels from aboveground into our underground water supply here in the mountains, I still have concerns for our water supply and others downstream from the Feltz Ridge/Leading Ridge Working Area.

While reading the Draft Decision Notice North Shenandoah Mountain Restoration and Management Project U.S. Forest Service North River Ranger District GW & J National Forests Rockingham County, Virginia and Pendleton County, West Virginia I see that page 1 and page 2 state “This decision will move forward with all of the treatment units, except for several units outlined below. A decision of these excluded units may occur at a later date. ... The excluded units have been fully analyzed in the final EA. The units not included in this decision are in the Feltz Ridge working area identified as units 19, 21, 24, 25, 202, 207 and 208. ... We have opted to delay the decision of treatments in this area until clear direction from the U.S. Fish and Wildlife Service on this issue has been established. ... In the event this consultation results in any changes to the proposed actions as outlined in the final EA, a supplemental analysis for public review in compliance with NEPA regulations may be issued for public review.” While reading the North Shenandoah Mountain Restoration and Management Project Draft Environmental Assessment Comments and Concerns I see that page 29 states “Imazapic is used in very specialized situations and is sometimes used as a pre-emergent in areas where it is challenging to control non-native invasive species. Currently there are no plans to use the chemical in the Feltz Ridge working area.” While reading the USDA Environmental Assessment North Shenandoah Mountain Restoration and Management Project Rockingham County, Virginia and Pendleton County, West Virginia I see that page 96 and 97 state on Herbicides, “All application protocols will be followed to protect water quality. ... In conclusion, negligible impacts to water quality from herbicide use can be expected from Alternative 1 and no impacts are expected from the No Action alternative.” I strongly feel that there have not been enough studies as to how water and contaminants move through our mountains to make this claim! I have been informed by Meg Riddle who works in the North River District Forest Service that Imazapic has only been used so far in the Slate Lick area. I wrote this in my September 13, 2019 GWNF comment letter, but I feel this needs to be stated again 'As requested by me, the BASF Chemical Company sent us their specification information on Plateau®. On p. 2. under ENVIRONMENTAL HAZARDS it states “The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground-water contamination. ... This product has a high potential for runoff for several months or more after application.” I request that Imazapic or related Imazapic herbicides not be used in the Feltz Ridge/Leading Ridge Working Area. If plans change and the use of Imazapic or related Imazapic herbicides in the Feltz Ridge/Leading Ridge Working Area is to occur, I request to be notified in advance at (540) 896-1232.

## **B. Concerns regarding proposed burns in the Feltz Ridge/Leading Ridge Working Area**

### **1. Air Quality that affects health during and after proposed burns in the Feltz Ridge/Leading Ridge Working Area**

I have expressed by concerns regarding air quality during and after proposed burns and have appreciated the calls from the North River District Forest Service when burns have occurred relatively close to my area. I would appreciate continuing to receive these calls at (540) 896-1232.

As mentioned in my other GWNF comment letters, I have breathing problems [asthma and sleep apnea] that are quickly and negatively affected by poor air quality. While reading the USDA Environmental Assessment North Shenandoah Mountain Restoration and Management Project Rockingham County, Virginia and Pendleton County, West Virginia I see that page 60 under A-3 - Direct, Indirect and Cumulative Effects *Alternative 1 - Proposed Action* states “Human exposure to ground level smoke can be more intense, relatively brief (hours rather than days) and limited to a smaller area than exposure from smoke aloft.” I must point out that

the - **hours rather than days** - statement is not reassuring to someone who is already struggling to breath! I did like on the same page “These impacts can be minimized by implementing the burn under weather conditions that are good for dilution and dispersion of the smoke away from some sensitive targets.”

**2. Have fire trucks and a water truck on hand or at least notified in order to be prepared**

I mentioned before that during the proposed burns the local fire department have a fire truck and a water truck on hand or at least notify the local fire departments of the proposed burn in order for them to have volunteers readily available. This was discussed as a possibility at the July 10, 2018 Forest Service Meeting, but was not mentioned in the plan or addressed in any of the documents attached to this last comment period.

**C. Thinning and Forest Stand Improvement with proposed temporary road in the Feltz Ridge/Leading Ridge Working Area**

As mentioned before, I live in the middle of the Feltz Ridge/Leading Ridge Working Area at elevation 1562 on the map on Little Dry River Road.

1. I requested that as many of the old growth stands of maple and oak trees on the Leading Ridge Working Area be allowed to remain. While reading the USDA Environmental Assessment North Shenandoah Mountain Restoration and Management Project Rockingham County, Virginia and Pendleton County, West Virginia I see that page 102 states “At present time, none of the identified old growth stands are being considered for treatment.” On that same page, I see that Little Dry River Watershed has an estimated old growth of 1,461 acres. I commend the Forest Service on that decision.

2. I suggested that a gate be put across the temporary road that is to be created on Leading Ridge. While reading the North Shenandoah Mountain Restoration and Management Project Draft Environmental Assessment Comments and Concerns I see that page 11 states “Gating of temporary roads will be considered during project implementation if other access control measures are not available.” Thank you.

Again I applaud the steps taken by the Forest Service to insure that our George Washington National Forest survives into the future. Thank you for your time and attention in this matter.

Sincerely,

Susan Plank

[NOTE: no way to sign letter; typed name is my signature]