Data Submitted (UTC 11): 9/13/2019 4:00:00 AM
First name: Susan
Last name: Plank
Organization:
Title:
Comments: Dear Mary Yonce,

I would like to thank the North River District for the work they have done on the North Shenandoah Mountain Project Plan. I have been impressed with their interest over the concerns that Virginians, especially the local population, have expressed about this project over the years. I appreciate their trying to incorporate changes in the plan to accommodate what we expressed as potentially damaging to our health and/or the environment where we live. As a concerned Rockingham County resident living at a private residence within the Feltz Ridge/Leading Ridge Working Area in George Washington National Forest, I appreciated and have taken advantage of the opportunities to attend the Forest Service informational meetings. My husband, Ray Plank , and I have also gone to and called our local Forest Service office to clarify parts of this plan. Having lived in this house for 24[frac12] years, we have taken advantage of other GWNF areas close by like Blue Hole and Slate Lick. I appreciate that the Weeks Act of 1911 established our eastern national forests "for the purpose of conserving the forest and the water supply of the States," "for the protections of the watersheds of navigable streams," and "preservation of the purity and regularity of flow of the mountain streams, with a view to their use for the water supply of towns and cities."

I would like to make comment on three areas in priority watersheds.

The first area of concern is Blue Hole Swimming Hole and stream bed in Bergton, VA:

I feel that the stream bed leading up to and past the Blue Hose Swimming Hole along with the swimming hole itself in Bergton needs repair work.

The second area of concern is Beech Lick Knob:

I applaud the Forest Service on having Beech Lick Knob as a Potential Wilderness Area and Recommended Wilderness Study Area. That many untrammeled acres in the GWNF will go a long way to help keep our Priority Watershed area clean and will also help protect our wildlife by giving them a large area of undisturbed wildlife habitat with no human habitation.

The third area of concern is Feltz Ridge and Leading Ridge Working Areas:

Water Quality of my well and others downstream of the Feltz Ridge/Leading Ridge Working Area

Some of Virginia's already impaired streams and rivers have their start in the GWNF. In order to be knowledgeable on general water flow in my area, I attended the VA Master Well Owner Network Training

Workshop given by Virginia Tech. 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. Basic groundwater flow system shows water infiltrates and through percolation moves down through the soil into the groundwater table which resurfaces as streams and springs . 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. Karst Topography is especially susceptible to land use related contamination and provides a direct connection to groundwater contamination.

With that as an explanation, here are my concerns:

In the August 2019 GWNF Draft Environmental Assessment North Shenandoah Mountain Restoration and Management Project it lists that chemical treatments may be used to kill some of the undesired plants [invasive species]. Being extremely allergic and having had severe reactions from air borne, physical contact and ingestion of various things, I am very concerned with any chemicals that may affect our excellent well water quality and the water quality of those downstream. On November 3, 2017, my husband and I went to our local Forest Service office and spoke with Mary Yonce and Meg Riddle about the herbicides that would possibly be used. We appreciated the Non-native invasive plant control EA as well as the CDMS product labels for triclopyr and glyphosate products that Meg Riddle sent us. I understand these will be site specific. If what was described to us and how it would be applied stays as described for triclopyr and glyphosate, then I have little concern with those herbicides being used. I attended the August 22, 2019 Forest Service meeting and asked if the Imazapic [name brand - Plateau[reg]] had been or would be used. Meg Riddle informed me that at this point Imazapic had only been used at the Slate Lick site. I have concerns for water in that area and potentially in our area because of the way water moves in our folded mountains and karst land. As mentioned above, groundwater water can be contaminated very quickly due to natural springs, wet water springs and how water flows through folded underground rocks. In the December 2010 EA Forest-Wide Non-Native Invasive Plant Control GWNF and Jefferson National Forests, Imazapic is listed as one proposed treatment for tall fescue [p. 84], bush honeysuckles [p. 85], princess tree [p. 86] and multiflora rose [p. 88]. I have not walked much of the proposed Feltz Ridge and Leading Ridge Working Areas to know if any of those plants are there and therefore, I do not know if Imazapic would potentially be used. As requested by me, the BASF Chemical Company sent us their specification information on Plateau[reg]. 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."

Our well water comes from the Feltz Ridge Working Area; therefore I would request that Imazapic not be used.

If it must be used, I would like to be notified in advance.

Concerns regarding proposed burns in the Feltz Ridge/Leading Ridge Working Area

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

One of the reasons we chose to be live in a very sparsely populated area was for my health. I have breathing problems [asthma and sleep apnea] that are quickly and negatively affected by poor air quality. Within this hollar, air does not clear out very well. I appreciate that the advance public notification was included in the plan and request that I be put on the notification list. Placing a note on my door would be the surest way to guarantee that I will receive the message. If that is not possible, my phone number is (***) ***-****.

Also, my next door neighbor has two family members who are highly allergic to poison ivy, poison oak and poison sumac and have had severe allergic reactions from the oil being carried by smoke.

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

During the proposed burns, I strongly suggest that the local fire department have a fire truck and a water truck on hand or at least notify the fire department of the proposed burn in order for them to have volunteers readily available. This was not mentioned in the plan, but was discussed as a possibility at the July 10, 2018 Forest Service Meeting. I understand this is a "controlled bum" not an unplanned fire, but I have seen first hand in 2016 how quickly a barn fire spread into 2 barn fires that then included loss of forest area. The Feltz Ridge/Leading Ridge Working Area is less than 20 miles from the Broadway volunteer department, but it took 45 minutes for the fire and water trucks to arrive.

Notify the local community, not just the adjoining landowners before the proposed burns

The local community needs to be notified before the proposed bums because wildlife will be on the move. About 22 years ago, the GWNF did a prescribed bum about four miles down the mountain. That afternoon my husband and I saw big cat tracks at our pond, but didn't worry since it seemed to be going away from our property. Later that night I found out first hand that it had not, the next day I called our local Forest Service to request notification of the next proposed bum and was told by our Forest Service Ranger that there are no mountain lions in Virginia. I know the difference between a bobcat and mountain lion and can tell you that I have seen both in my yard.

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 ********. Below are the suggestions I have regarding these issues.

I do understand that some thinning must occur to improve the forest, but I would ask that as many of the old growth stands of maple and oak trees on the Leading Ridge Working Area be allowed to remain.

I request that I be notified of the opportunity of timber harvesting in the Feltz Ridge/Leading Ridge Working Area.

I suggest that a gate be put across the temporary road that is to be created on Leading Ridge.

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