

# BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

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Dear Content Analysis Team:

## **Comments regarding Draft Environmental Impact Statement and Proposed Revised Land and Resource Management Plan for the Jefferson National Forest**

I am submitting comments on behalf of the Board of Directors of the Blue Ridge Environmental Defense League (BREDL). BREDL has been interested in the management of our National Forests since the mid-1980's. BREDL is a regional, community-based, non-profit environmental organization. Our founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. BREDL has chapters throughout the Southeast, including Virginia. Our members depend on the Jefferson National Forest for providing and protecting area drinking water supplies. Our members rely on the recreational use, scientific attributes and life-sustaining benefits of the Jefferson National Forest.

The preferred alternative I of the Draft EIS and Land Management Plan does not protect inventoried roadless areas, offers little potential Wilderness Areas, and does not fully address the use of prescribed burning and its impact on the area's air quality.

### **Wilderness Areas**

BREDL strongly urges the U.S. Forest Service to respect the compromises and diplomacy that was involved to ensure that Wilderness protection is a real part of this Forest Plan revision. It is disappointing that the Forest Service has not done this in the preferred Alternative, especially considering that early in the process the Forest Service encouraged participants to work out our differences. For the most part, BREDL reiterates our September 5, 2002 comments to Supervisor Bill Damon, which endorsed several Wilderness Areas. However, there are a few revisions to BREDL's list. We request that the Forest Service make the following changes to the preferred alternative for the

Jefferson Plan to include these Wilderness Study Areas and National Scenic Areas:

BREDL continues to support these areas for Wilderness Study:

- Brush Mountain East
- Brush Mountain
- Raccoon Branch
- Horse Heaven
- Panther Knob
- Little Walker
- Crawfish Valley - Smyth County portion

BREDL supports these areas for National Scenic Areas:

- Long Spur
- Brushy Mountain
- Seng Mountain
- Crawfish Valley - Wythe County portion, including the previously excluded section east of the Ceres Turnpike and the game management lands.

BREDL supports the 2 new Wilderness Study Areas that were included in Alternative I:

- Garden Mountain
- Hunting Camp Creek/ Little Wolf Creek

BREDL also supports the new Additions to existing Wilderness Areas that were included in Alternative I. Also, we request that the U.S. Forest Service include all of the following Additions in Alternative I:

- Lewis Fork
- Little Wilson Creek

### **Roadless Areas**

The Forest Service has failed to serve the public's interest and listen to public input by inadequately protecting Roadless Areas in the preferred Alternative. The public showed overwhelming support of the Roadless Policy as it was finalized in January 2001. As pointed out in BREDL's August 28, 2001 comments on the Roadless Area Conservation Rule, In Virginia, 98.3 percent of 45,513 comments provided were in support of protecting the remaining inventoried Roadless Areas. Despite this tremendous public involvement and support for Roadless Areas, the Forest Service has not made an effort to protect many of the approximately 153,000 inventoried Roadless acres in the Jefferson National Forest. The preferred Alternative I contains a hodge-podge of management prescriptions for the inventoried Roadless Areas. This includes several prescriptions that will allow temporary and/or permanent roads (See Attachment 1). BREDL requests the

Forest Service provide full protection for all of the Jefferson Roadless Areas by designating them as either Wilderness Study Areas (Prescription 1B), National Scenic Areas (for those special areas listed above under the Wilderness Section), or Natural Processes in Backcountry Remote Areas (Prescription 12C).

### **Prescribed Burns/Air Quality**

BREDL commends the U.S. Forest Service in addressing air pollution problems in the National Forest. We are aware of several instances when the Forest Service has been a strong voice during new facility permitting. We strongly encourage the Forest Service to continue this role in the revised Forest Plan. In the Draft Plan, we applaud the Forest Service for addressing the criteria pollutant pollution of PM 2.5 that is emitted from prescribed burning. PM 2.5 has been linked to respiratory and heart problems and premature deaths. We also encourage the inclusion of PM 2.5 pollution generated by prescribed burns to be a part of the State Implementation Plan. With that being said, we do remind the Forest Service that it has an obligation in protecting citizen's health by properly controlling and scheduling any prescribed burns.

The Roanoke Valley and Bristol areas are the only 2 areas in Virginia (areas that actually have monitors) that are not meeting the new PM 2.5 health standard (See Attachment 2). The Draft EIS, page 3-21, mentions that Bristol will not meet the PM 2.5 standard, but fails to include 2002 data that shows the Roanoke area will also not meet the standard. These 2 areas happen to be in close proximity or virtually a part of the Jefferson National Forest. They represent the nearest Virginia Department of Environmental Quality PM 2.5 monitors to the Jefferson and are indicative of pollution levels in and around the Jefferson. Sometime during the summer of 2003, the EPA will validate the 2002 data. We request that the Forest Service update the PM 2.5 data for the Final Forest Plan to include data for 2002.

Prescribed burns can have a significant impact on people as evident in Smyth County a couple of years ago, pollution from a U.S. Forest Service prescribed burn in the Cherokee National Forest drifted into Smyth County, Virginia where it remained for a few days because of stagnant air. The Smyth County News and Messenger reported that several citizens experienced respiratory problems because of the smoke from the prescribed burn.

The DEIS, page 3-24, states that the Forest Service does not expect prescribed burns to be a big contributor to PM 2.5. However, since Roanoke and Bristol are already exceeding the annual standard, any additional PM 2.5 will not help. In addition, prohibiting open burning is one of the strategies that is used to reduce ozone, as well as PM 2.5. Some localities in Virginia have a ban on open burning because of added impacts to poor air quality. The Forest Service should adhere to these same principles. How can we expect citizens to respect open burning bans when the government willfully implements huge burns? Therefore, we urge the Forest Plan to take several additional measures to lessen impacts to air quality and the public's health:

1) Soon, Virginia DEQ will be initiating daily PM 2.5 forecasting for some areas of Virginia. This should use the same Air Quality Index codes as the current ozone forecasting. We request that the Forest Service include in the Final Forest Plan an air quality standard that restricts prescribed burns during forecasted high (Orange AQI – AQI over 100 or days when AQI may be forecasted higher than Orange (Red & Purple coded)) PM 2.5 days and we strongly suggest limiting prescribed burns during forecasted Yellow AQI PM 2.5 days if the forecast calls for an AQI over 75 (Some areas assign AQI numbers to their forecasts). For example, this measure could be included in a similar way as FW-144 (LMP p. 2-35).

2) We request that the Forest Service include in the Final Forest Plan an air quality standard that restricts prescribed burns during forecasted high (Orange AQI – AQI over 100 or days when AQI may be forecasted higher than Orange (Red & Purple coded)) Ozone days (8-Hour standard) and we strongly suggest limiting prescribed burns during forecasted Yellow AQI Ozone days (8-Hour standard) if the forecast calls for an AQI over 75

3) The Forest Service should work closely with Virginia DEQ and EPA pollution forecasters prior to prescribed burns.

4) The Forest Service should monitor air concentrations during large prescribed burns. A large burn should be defined in the Final Forest Plan.

### **Other Comments**

BREDL supports the designation of all rivers listed in Table 2-12, LMP p. 2-40, as part of the National Wild and Scenic Rivers System.

We argue that the Jefferson contains too many miles of roads. Reducing the mileage of roads and road density should be a forestwide goal. Adequate road density standards and standards to actually reduce the amount of roads should be included in the LMP.

The Draft Plan does not adequately address Forest Fragmentation and the cumulative impacts to flora and fauna.

The Final Plan should include a management prescription that prohibits logging and road construction for all riparian areas, including zones along all ephemeral streams and headwaters.

The Draft Plan will have significant negative impacts on the endemic Peaks of Otter salamander. Logging, road-building and other types of ground-disturbances needs to be prohibited for the entire Peaks of Otter Salamander habitat.

The Forest Service must fulfill its obligations under the current laws and adopt an adequate Management Indicator Species program. The Forest Service must include obvious taxa and populations like plants, aquatic insects, fish, salamanders and other species that reflect the health of the full range of forest and aquatic communities. The Forest Service also must adopt strong Plan Standards that require an intensive and thorough survey and analysis of all Sensitive and Locally Rare species on the Jefferson National Forest.

The Draft Plan will allow 22 million board feet per year of timber to be extracted from the Jefferson. The Allowable Sale Quantity for the Jefferson should not be increased above the amount of board feet that is currently being cut (9 million board feet per year). The Final Plan needs to be revised to reflect either less than 9 million board feet per year or 0 extraction.

### **In Conclusion**

BREDL strongly requests the Forest Service revise the preferred Alternative I to reflect more Wilderness Study Areas, better protection of Inventoried Roadless Areas, include additional air quality measures for prescribed burns, reduce road density, include an adequate Management Species Indicator program, include a management prescription which protects riparian areas, and reduce the amount of allowable timber extraction. Until Alternative I is revised in these areas, we prefer Alternative G which offers more Wilderness Study Areas, better protection for Inventoried Roadless Areas and less timber extraction.

Sincerely submitted,

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## Attachment 1

| <b>Roadless Area</b>           | <b>ID</b> | <b>Acres</b> | <b>Alt. I</b> | <b>Description</b>                |
|--------------------------------|-----------|--------------|---------------|-----------------------------------|
| Barbours Creek Wild Add.       | 14503     | 732          | 8C            | Black Bear                        |
| Bear Creek                     | 14607     | 18,211       | 12C           | Backcountry - Nat. Processes      |
|                                |           |              | 8C            | Black Bear                        |
|                                |           |              | 12B           | Backcountry - Non-Motorized       |
|                                |           |              | 8E6           | Old Field Habitats                |
|                                |           |              | 9H            | Maintenance/Restoration           |
|                                |           |              | 8E1           | Ruffed Grouse                     |
| Beartown Wild Add A            | 14606     | 1,369        | 12C           | Backcountry - Nat. Processes      |
| Beartown Wild Add B            | 14699     | 3,325        | 8C            | Black Bear                        |
| Beaverdam Creek                | 04014     | 1,133        | 2C3           | Eligible Recreational River       |
|                                |           |              | 12B           | Backcountry - Non-Motorized       |
| Broad Run                      | 14508     | 10,965       | 12B           | Backcountry - Non-Motorized       |
|                                |           |              | 7E2           | Dispersed Recreation - Suitable   |
| Brush Mtn                      | 14108     | 5,998        | 12B           | Backcountry - Non-Motorized       |
|                                |           |              | 4J            | Urban/Suburban Interface          |
| Brush Mtn East (audie murphy)  | 14109     | 4,912        | 12B           | Backcountry - Non-Motorized       |
| Brushy Mtn.                    | 14603     | 4,165        | 12B           | Backcountry - Non-Motorized       |
| Garden Mtn                     | 14605     | 3,545        | 1B            | Recommended Wilderness Study      |
| Hoop Hole                      | 14505     | 5,576        | 4K2           | Hoop Hole Special Area            |
|                                |           |              | 7E1           | Dispersed Recreation - Unsuitable |
| Hunting Camp/Little Wolf Creek | 14604     | 8,771        | 1B            | Recommended Wilderness Study      |
| James River Face Wild Add      | 14302     | 1,140        | 1B            | Recommended Wilderness Study      |
|                                |           |              | 8E1           | Ruffed Grouse                     |
| Kimberling Creek Wild Add A    | 14601     | 89           | 7E1           | Dispersed Recreation - Unsuitable |
|                                |           |              | 1B            | Recommended Wilderness Study      |
| Kimberling Creek Wild Add B    | 14602     | 195          | 1B            | Recommended Wilderness Study      |
| Lewis Fork Wild Add            | 14403     | 748          | 4K3           | Crest Zone Special Area           |
|                                |           |              | 1B            | Recommended Wilderness Study      |
| Little Dry Run Wild Add        | 14407     | 2,205        | 12A           | Backcountry - Few Roads           |
| Little Horse Heaven            | 14406     | 4,722        | 12B           | Backcountry - Non-Motorized       |
| Little Walker Mountain         | 14609     | 9,815        | 12B           | Backcountry - Non-Motorized       |
|                                |           |              | 8E1           | Ruffed Grouse                     |
| Little Wilson Crk Wild Add A   | 14401     | 78           | 1B            | Recommended Wilderness Study      |
| Little Wilson Crk Wild Add B   | 14402     | 1,724        | 4K3           | Crest Zone Special Area           |
| London Bridge Branch           | 04015     | 853          | 2C3           | Eligible Recreational River       |
|                                |           |              | 12B           | Backcountry - Non-Motorized       |
| Long Spur                      | 14608     | 6,411        | 12B           | Backcountry - Non-Motorized       |
|                                |           |              | 8A1           | Mix of Successional Habitats      |
| Mottesheard                    | 14501     | 6,553        | 8C            | Black Bear                        |
|                                |           |              | 12B           | Backcountry - Non-Motorized       |
| Mtn Lake Wild Add A            | 14104     | 1,467        | 1B            | Recommended Wilderness Study      |
| Mtn Lake Wild Add B            | 14105     | 3,958        | 1B            | Recommended Wilderness Study      |
|                                |           |              | 9H            | Maintenance/Restoration           |
|                                |           |              | 8A1           | Mix of Successional Habitats      |
| Mtn Lake Wild Add C            | 14106     | 494          | 1B            | Recommended Wilderness Study      |

| <b>Roadless Area</b>  | <b>ID</b> | <b>Acres</b> | <b>Alt. I</b> | <b>Description</b>               |
|-----------------------|-----------|--------------|---------------|----------------------------------|
| North Fork of Pound   | 14509     | 4,756        | 4K6           | North Fork of Pound Special Area |
| North Mountain        | 14507     | 8,371        | 12B           | Backcountry - Non-Motorized      |
|                       |           |              | 9A1           | Source Water Protection          |
| Patterson Mountain    | 14506     | 4,862        | 12B           | Backcountry - Non-Motorized      |
|                       |           |              | 9F            | Rare Communities                 |
| Peters Mtn Wild Add A | 14102     | 1,296        | 1B            | Recommended Wilderness Study     |
| Peters Mtn Wild Add B | 14103     | 2,903        | 1B            | Recommended Wilderness Study     |
|                       |           |              | 8C            | Black Bear                       |
| Price Mtn             | 14507     | 9,114        | 12B           | Backcountry - Non-Motorized      |
|                       |           |              | 7E2           | Dispersed Recreation - Suitable  |
|                       |           |              | 8A1           | Mix of Successional Habitats     |
| Raccoon Branch        | 14404     | 4,384        | 12B           | Backcountry - Non-Motorized      |
| Rogers Ridge          | 04010     | 180          | 4F            | Scenic Area                      |
| Seng Mountain         | 14405     | 6,455        | 8C            | Black Bear                       |
|                       |           |              | 12B           | Backcountry - Non-Motorized      |
| Shawvers Run Wild Add | 14502     | 1,926        | 1B            | Recommended Wilderness Study     |
|                       |           |              | 8E4b          | Indiana Bat Sanctuary            |

\*Acres listed are for the entire Roadless Area. Acres are not broken down to reflect how many acres are under each prescription for that Area.





**Bristol PM 2.5 data  
Annual Standard**

| <b>1999</b>   | <b>1 Qtr</b> | <b>2 Qtr</b> | <b>3 Qtr</b>                         | <b>4 Qtr</b> | <b>Annual</b> | <b>3-yr ave.</b> |
|---|--------------|--------------|--------------------------------------|--------------|---------------|------------------|
| <b>Bristol</b>  | NA           | 15.1         | 21.4                                 | NA           | 16.3          |                  |
|   |              |              |                                      |              |               |                  |
| <b>2000</b>   |              |              |                                      |              |               |                  |
| <b>Bristol</b>  | 16.0         | 16.3         | 15.8                                 | 17.6         | 16.4          |                  |
|   |              |              |                                      |              |               |                  |
| <b>2001</b>   |              |              |                                      |              |               | (1999-2001)      |
| <b>Bristol</b>  | 13.0         | 16.0         | 19.3                                 | 12.2         | 15.1          | 16.0             |
|   |              |              |                                      |              |               |                  |
| <b>2002</b>   |              |              |                                      |              |               | (2000-2002)      |
| <b>Bristol</b>  | 11.5         | 14.8         | 17.9                                 | 12.1         | 14.1          | 15.2             |
|   |              |              |                                      |              |               |                  |
|   |              |              |                                      |              |               |                  |
| - source DEQ data                                     |              |              | - data in micrograms per cubic meter |              |               |                  |
|   |              |              |                                      |              |               |                  |
|   |              |              |                                      |              |               |                  |
| EPA will validate 2002 data during the summer of 2003 |              |              |                                      |              |               |                  |
|   |              |              |                                      |              |               |                  |
| EPA standard is 15.0 ug/m3.                           |              |              |                                      |              |               |                  |