

Blue Ridge Environmental Defense League

www.BREDL.org PO Box 88 Glendale Springs, North Carolina 28629 BREDL@skybest.com (336) 982-2691

January 5, 2015

National Forests in North Carolina
Kristin Bail
Supervisor's Office
160 Zillicoa St. Suite A
Asheville, NC 28801



Re: Nantahala and Pisgah National Forests Plan Revision Comments

Dear Ms. Bail,

I write to express concerns on behalf of the Blue Ridge Environmental Defense League (BREDL) about the 15 Year Plan Revision for the Nantahala and Pisgah National Forests. Thank you for the opportunity for public comment. These lands are of immeasurable value to the people of North Carolina and the United States, for their educational resources, wildlife habitation, recreational use, forest products such as timber, scenic vistas, solitude and intrinsic beauty as natural places. These forest lands are important to the livelihood of many residents in NC and provide key opportunities for outdoor recreation and enjoyment of natural beauty. BREDL would like to emphasize the importance of ensuring that these lands are preserved for enjoyment by future generations, and protected from harmful polluting industries such as hydraulic fracturing and mineral extraction. Our concerns about excessive logging and the use of chemical pesticides and herbicides are also expressed here:

- Commercial biomass fuel should be expressly prohibited as a standard in the plan revision.
- The plan for Pisgah and Nantahala must expressly prohibit fracking and all oil and gas development activities.
- Toxic chemicals should be banned in ecologically sensitive and highly-trafficked management areas. Further research is needed in the area of invasives and pest control.
- Prescribed burning, chemical herbicide and pesticide uses should be prohibited in Wilderness Areas and Wilderness Study areas. All proposed Wilderness and Wilderness Study Areas under the draft plan online mapping tool should be included and receive this designation.

The Blue Ridge Environmental Defense League (BREDL) is a regional, community-based, non-profit environmental organization. BREDL was founded in 1984 as a result of community grassroots organizing in the Blue Ridge Mountains of western North Carolina and Virginia, where local residents opposed the planned construction of a high-level nuclear waste dump in the region by the US Department of Energy. Our founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. We believe in the practice of earth stewardship, not only by our League members, but by our government and the public as well. BREDL sets standards for environmental quality and awards individuals and agencies who uphold these standards in practice.

The following components should be included in the Management Plan as "standards," that can and will be enforced by the authority of the USFS, as well as written into the plan's "objectives" and "desired conditions." The Pisgah and Nantahala National Forests are enjoyed by millions each year and

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encompasses over one million acres in western NC along the Appalachian Mountains in eighteen counties. These two national forests attract more visitors annually than most other national forests in the country and include the heavily used Appalachian National Scenic Trail as well as six federally designated wilderness acres totaling approximately 66,550 acres.¹ Where industrial and commercial activities are considered by the Forest Service within the plan revision, BREDL makes the following recommendations:

1. **Timber Production-** Currently the draft plan designates roughly 700,000 acres to be permitted for logging, adding approximately 200,000 to the 500,000 acres in Management Areas 1 and 2A. The Forest Service has employed best practices for timber production and harvest since the 2000's, and must continue to do so. This timber is a valuable resource for Americans and generates income for the Forest Service. It should continue to be sold locally and used for sustainable domestic production, rather than be exported. No timber harvested in US National Forests should not be burned and burned as fuel for "biomass" energy production.

Growing opposition to biomass incineration is evident throughout the US and Europe. This industry, misnamed as 'green' energy, emits significant amounts of dangerous chemicals and pollutants into the air including particulate matter, volatile organic compounds, sulfur dioxide, nitrogen oxide and carbon monoxide. The North Carolina Academy of Family Physicians has stated that "Biomass burning of ... wood waste creates emissions of particulate matter that research has shown increase the risk of ... asthma, chronic bronchitis, and heart disease. This burning process also creates ... nitrogen oxides and volatile organic compounds (VOCs) that increase smog and ozone, which are known to increase lung disease and mortality; sulfur dioxides which also contribute to respiratory disease ...".² The burning of timber harvested in the Pisgah and Nantahala National Forests as commercial biomass fuel should be expressly prohibited as a standard in the plan revision.

2. **Mining activities-** The extractions of minerals, particularly oil and gas development, including hydraulic fracturing must be expressly prohibited as well. Currently, under "Minerals and Geology," the draft plan includes mining activities that meet legal mandates as a "desired condition." Recreational mineralogy or "rock hounding" must be permitted explicitly and designated separately from commercial or industrial mining activities, including natural gas and oil exploration, which must be prohibited in all National Forests. At both the Federal and State level, the gas industry and other drilling proponents in North Carolina are seeking to weaken regulations. Over five million acres of National Forest Service lands are currently leased for oil, gas, coal, and phosphate mining operations. At any given time, the Forest Service administers operations on approximately 160,000 mining claims and manages approximately 2,600 mineral material sale contracts. In the 1970s, nearly all eastern US national forest lands were leased for gas and oil drilling. Today, fracking is underway in national forests in Pennsylvania and Alabama,

¹ http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3815717.pdf

² http://www.wiregrass-ace.org/linked/ncafp_letter_of_concern_regarding_biomass_burning.pdf

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with others pending.³ Deferring to the US Bureau of Land Management to rule on mining activities in the National Forests is not acceptable, as we have seen the outcome the George Washington National Forest, which is now open to fracking on approximately 177,000 acres.⁴

The plan for Pisgah and Nantahala must expressly prohibit fracking and all oil and gas development, based on the following propositions and threats to the enjoyment and existence of this natural ecosystem⁵:

- The footprint of fracking is much larger in scale than conventional drilling. For instance, an 8,000-foot-deep well, with its containment ponds, can cover up to 10 acres forestland.
- Fracking is also more disruptive than logging to the forests. Compared to logging, the well pad for fracking requires permanent clearing, affecting and delaying new growth.
- From 1 to 8 million gallons of water may be used to frack a well. For each well, 80 to 300 tons of a mixture of 596 chemicals may be used, many of them toxic; for example, formaldehyde, ethylene glycol, methanol and benzene. The natural gas industry can ask that a chemical or mixture of chemicals be considered a trade secret. They would not have to disclose this information to the public.
- Scientists have identified toxic benzene, toluene, ethyl benzene, xylene and other volatile organic compounds emitted in the fracking process.

Protection of the watersheds in these forests is of the greatest importance in consideration of the fifteen-year plan revision, for the benefit of the public. Hydraulic fracturing must be prohibited by the plan because if it is allowed, there would be no federal regulations for protection of the water supply. Fracking is exempt from both the Clean Water Act and the Safe Drinking Water Act. Hundreds of products containing more than 750 chemicals and components are potentially used throughout the extraction process, including more than 100 known or suspected endocrine-disrupting chemicals.⁶ Allowing the authority to be given to the BLM without utilizing the opportunity held by the public and the USFS to condemn fracking and other oil and gas development activities would be a travesty for this eco-system, its wildlife, and the people of NC and the United States of America.

3. **Use of chemical herbicides and pesticides-** Due to the high toxicity and health impacts identified by numerous studies concerning the pesticides and herbicides, particularly glyphosate and tricopyr, the spraying of herbicides and pesticides should be prohibited where run-off can cause contamination of surface water or groundwater, and where chemicals pose a threat to human health or to a fragile ecosystem. Glyphosate is an endocrine disruptor and is known to cause a particular threat to amphibians and large herbivores.⁷ According to the EPA, prolonged

³ http://www.bredl.org/pdf4/140626_Fracking_Forum_Fact_Sheet_1TsEdit.pdf

⁴ <https://www.southernenvironment.org/news-and-press/press-releases/conservation-groups-support-forest-service-decision-to-keep-gw-off-limits-t>

⁵ http://www.bredl.org/pdf4/140626_Fracking_Forum_Fact_Sheet_2.pdf

⁶ Endocrinology, Volume 155 Issue 3 - March 2014, Kassotis CD et al, ISSN 1945-717

⁷ http://www.ruraltech.org/video/2006/invasive_plants/pdfs/Douglas_Hall/10_bautista.pdf

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exposure to glyphosate can result in reproductive effects in humans, as well as kidney damage, and congestion of the lungs.⁸ Recent studies have also linked the increase in glyphosate application in the US to rising rates of autism in children.⁹

Under the current plan for Nantahala and Pisgah National Forests, glyphosate, triclopyr and other toxic chemicals are sprayed to manage pests and control invasive species in all areas except for management areas 7- Congressionally Designated Wilderness, 6- Wilderness Study Areas and Recommended Wilderness Areas, and 4D- Designated Wild and Scenic Rivers. This prohibition should extend to other sensitive and highly-exposed management areas including all sub-sections of 4- Significant Recreation and Heritage Corridors, 5- Special Interest Areas and Research Natural Areas, 8- Experimental Forests, 9- Roan Mountain, 10- Concentrated Recreation Areas, 11- Cradle of Forestry and 12- Administrative Sites. Because of the volume of human traffic and recreation in these management areas, toxic chemicals should be banned and further research with public transparency is needed in the area of invasives and pest control. As toxic-free alternatives are being studied and employed in the industry, the Forest Service should use good governance practices to determine the safety of chemical application.

Laws and regulations in other states which restrict the use of herbicides and pesticides in forests demonstrate best practices for chemical regulations. In Washington State, for example, public processes to know about or make comment on timing, location and types of herbicides used are available through the website Forest Practices Application Review System (FPARS).¹⁰ A study by the Oregon-based organization Beyond Toxics found that in Oregon's industrial forests, prohibiting state agencies, researchers, medical professionals and the public from getting accurate information about what types and quantities of herbicides are sprayed increases the potential for health and environmental risks due to the absence of regulations for buffer zones around homes, schools, towns, drinking water, and the headwaters of rivers.¹¹ National Forests should follow these recommendations to regulate the application of herbicides such as glyphosate, and more research is needed to develop alternative best practices to control the spread of invasive species.

- 4. Incorporation of Wilderness Areas and Recommended Wilderness Study Areas-** In order to achieve the highest level of protection for the public lands from chemical application, potential mining activities and prescribed burns, all draft Wilderness and Wilderness Study areas proposed in the Collaborative Mapping Tool should be included under the Pisgah and Nantahala plan revision. Wilderness areas provide special protection of watersheds by banning these actives. Prescribed burning must continue to be prohibited in all Wilderness and Wilderness

⁸ <http://www.epa.gov/ogwdw/pdfs/factsheets/soc/tech/glyphosa.pdf>

⁹ <http://themindunleashed.org/2014/10/mit-researchers-new-warning-todays-rate-half-u-s-children-will-autistic-2025.html>

¹⁰ http://www.beyondtoxics.org/wp-content/uploads/2013/12/FINAL_Report_OregonIndustrialForest_and_HerbicideUse_12-17-13.pdf

¹¹ http://www.beyondtoxics.org/wp-content/uploads/2013/12/FINAL_Report_OregonIndustrialForest_and_HerbicideUse_12-17-13.pdf

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Study areas. In addition to destroying the wilderness quality, New published research by fire ecology scientists are finding that the nature of prescribed burns with their low-intensity fires are much less common than purported, don't support biological diversity or natural processes, and do not prevent more severe fires.¹² Production of toxic releases of formaldehyde, carbon monoxide, acrolein, respirable particulates, benzene and large carbon are released into the atmosphere during burns, threatening human health and safety.¹³ Prescribed burning also carries the risks of uncontrolled fires, as well as the killing of animals and loss of habitat, loss of recreational use and destruction of the scenic value. Chemical herbicide and pesticide use should remain prohibited in Wilderness Areas and Wilderness Study areas.

Incorporation of the proposed Wilderness Areas and Wilderness Study areas into the plan revision for Pisgah and Nantahala Forests will guard against commercial activities and treatments of these valuable and pristine public lands, and preserve them from future special interests that may seek to exploit these tracts of land in the Blue Ridge Mountains for their own profit. Wilderness Areas offer the greatest level of protection that must be enforced and upheld under The Wilderness Act of 1964, which states that, "In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness."¹⁴ BREDL would like to thank the Forest Service in NC for upholding their commitment to preserve these areas and asks that all proposed areas be included in the Wilderness and Wilderness Study designated areas.

The Blue Ridge Environmental Defense League has a thirty year history of protecting communities in the Southern Appalachian Mountains, and preserving the heritage of our public lands for wilderness, wildlife, and future generations. We ask that the National Forest Service in North Carolina explicitly prohibit activities that endanger these forests and the surrounding communities including oil and gas development, excessive logging and biomass production, chemical treatment, and prescribed burning of designated Wilderness Areas. Thank you.

Respectfully,



Louis Zeller, Executive Director

¹² <http://www.nytimes.com/2012/09/18/science/earth/forest-survey-questions-effect-of-prescribed-burns.html?pagewanted=all>

¹³ <http://www.psr.org/environment-and-health/environmental-health-policy-institute/responses/hidden-health-costs-of-forest-fires.html>

¹⁴ <http://www.wilderness.net/NWPS/legisAct>