



April 24, 2017

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Sent Via Email

Re: Comments on Nettle Patch Project Draft Environmental Assessment

Dear Ranger Christensen:

Board of Directors:

Bette Dzamba

Howard Evergreen

Jennifer Lewis

Laurie Miller

Ernie Reed

David Sellers

Deirdre Skogen

Elizabeth Williams

I am submitting these comments on behalf of Wild Virginia. We hereby adopt and incorporate by-reference the comments submitted by the Clinch Coalition. We emphasize several particular issues addressed in those comments.

1. Climate change - Virginia's National Forests provide one of the greatest carbon sinks in the eastern U.S. and their importance in this regard must be properly emphasized and analyzed in this and every project review conducted by the George Washington and Jefferson National Forests (GWJNF). Carbon capture is amongst the most important resources these Forests can provide and the incremental changes in that capacity must be thoroughly assessed and valued as such. The importance of this resource value in comparison to the values of proposed activities, both economically and for natural system functions, is enormous. The scientific literature contains a significant body of findings that support the conclusion that mature forests are more effective at carbon sequestration. This contradicts contrary assertions in the DEA. The entire range of literature on this topic must be examined and discussed in the DEA.

2. Storm event analyses - as discussed in Clinch Coalition comments, the averaging of stormwater runoff and sediment discharges over yearly or greater periods is inadequate to understand these problems and ensure that water quality standards will be met. Monitoring during selected storm events before project activities are undertaken is necessary, along with continued monitoring during and after work is done. It is a well-established fact that one storm event alone in areas where vegetation is removed and land surfaces disturbed may contribute the vast majority of a years-worth of sediment discharges. Correspondingly, the event-based impacts on streams must be compared to the water quality standards, both for aquatic life support and recreation. We also note that the types of pollution control practices recommended by Virginia Department of Forestry guidelines and others are not specifically designed to meet water quality standards, especially antidegradation requirements. Rather, these documents discuss minimizing pollution discharges and impacts but do not quantify the pollutant removal rates and effectiveness as would be necessary to assess event-based compliance with standards. Some pollution reduction practices have very poor performance records. For example, silt fences are proven to have an extremely limited capacity for pollutant removal, especially where very fine-grained soils are present.

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3. Herbicides - The discussion of herbicides in the DEA improperly ignores much evidence as to the hazards posed by the chemicals the Forest Service proposes to use. The required "hard look" does not allow more current findings on the potential health hazards to be ignored and the lack of analysis or actions by U.S. regulatory agencies to reflect more recent scientific findings is not an adequate basis for dismissing threats, as the DEA does. Further, the fate and transport of the chemicals in the environments where the FS proposes to use them is not shown in the DEA and, we believe, is not adequately understood. Targeted sampling of soils and water in the vicinity of representative areas where herbicides have been used in the past and of areas where their uses are proposed here is required.

Thank you for the chance to comment on this project and for your consideration of the issues we have raised.

Sincerely,

/s/ David Sligh

David Sligh
Conservation Director

cc: Karen Overcash, GW&J NF