



Jason Dring  
<jasondring@mac.com>  
m>

To: comments-southern-georgewashington-jefferson@fs.fed.us  
cc:  
Subject: GW Forest Plan Revision

11/07/2008 03:41 PM

To Whom It May Concern:

I write to register opposition to the two proposals to build private, for-profit industrial scale wind turbine projects on public national forest land on the wilderness ridge top of Great North Mountain in the GW National Forest. As a child, my father and I often hiked upon the ridge top where some of the best views of the Shenandoah Valley, my family's ancestral home, exist. As an adult, I mountain bike on the same ridge any time the weather is appropriate. Over the years I've encountered hundreds of hikers, bikers, bird-watchers, who are enjoying one of the last quiet places on the East Coast. These uses, plus hunting, are consistent with the intended public use of protected national forest lands.

The proposal to build 131 enormous 45 story tall wind turbines on the ridge top would irrevocably ruin views of the mountain from beautiful, rural Shenandoah Valley, and degrade wildlife habitat for forest animals and for birds, bats and eagles - all for the private profit of a few out of state investors who want to use free public land to cash in on federal subsidies for a project that will produce little electricity only intermittently (when the wind blows) to be sold to people who don't even live in the valley.

Massive industrial wind turbines are very disruptive and not appropriate for all locations. Wind studies affirm that ideal locations are the North American continental wind corridor from Texas north through Utah, and on each coast. In Virginia the coast represents over 80% of the ideal wind for power production, while Appalachian ridge lines contribute only moderate winds for industrial power production. The only possible reason this project is proposed by out of state investors is that the land is public - so the investors don't have to buy it, and don't have to pay taxes on it, and it represents a quick and easy way for them to cash in on federal subsidies.

UVA environmental science professor Rick Webb notes that wind on the Appalachian ridge tops is so unsuited to power production that turbines would have to be built on virtually every Appalachian ridge top from Virginia to Georgia in order to produce the equivalent power of one coal plant. With the very small payback a project of this size will produce, combined with the enormous damage it will wreak on the wilderness forest the forest service should reject the proposals outright. This proposal is completely at odds with the stewardship purpose of national forests and a completely inappropriate use of public land for private profit.

Please help conserve the forest so that I may someday enjoy it with my newborn son.

Sincerely,

Jason Dring,

Washington, DC

# Shenandoah FORUM

4689 Wissler Road Mount Jackson, Virginia 22842 • info@ShenandoahForum.org • www.ShenandoahForum.org

November 13, 2008

USDA Forest Service  
Southern Region  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke Virginia 24019

Dear Sir/Madam:

Please find enclosed a copy of the George Washington Forest Drinking Water Resolution that was approved by Shenandoah Forum. On behalf of the Board of Directors for the Forum, I submit this resolution and ask that it be entered as part of the planning record for the Forest Plan Revision.

We look forward to our continued participation with the Forest Plan Revisions.

Sincerely,



Kim Woodwell  
Shenandoah Forum Membership & Communications Director

Cc: Lee Ranger Forest District



**George Washington Forest Management Plan  
Resolution for Drinking Water Resource Management**

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest.

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "Improve watershed condition."

WHEREAS, the provision of clean safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it.

WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters.

WHEREAS, drinking water sources within the George Washington National Forest serve an estimated 20,124 residents in Augusta County and the City of Staunton, 52,635 residents in Rockingham County, the City of Harrisonburg and the towns of Bridgewater and Broadway, 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, 12,500 residents in Front Royal and 41,840 residents in Frederick County, the City of Winchester and Middletown.

WHEREAS, the watersheds of the five reservoirs in the George Washington National Forest provide drinking water for almost 100,000 people, including the Staunton and Elkhorn Lake Reservoirs, serving the City of Staunton and some Augusta County residents, and the Switzer Lake Reservoir, serving the City of Harrisonburg and some Rockingham County residents.

WHEREAS, the watersheds of surface waters that flow from the George Washington National Forest, such as the North River and the North and South Forks of the Shenandoah River, provide drinking water to an additional 165,000 people in communities including Bridgewater, Broadway, Front Royal, Harrisonburg, Middletown, Strasburg, Winchester and the surrounding counties.

WHEREAS, the greatest threats to water quality within the George Washington National Forest are ground disturbing activities, such as timber harvesting and road construction, which result in erosion and sedimentation.

WHEREAS, under the 1993 George Washington National Forest Management Plan most of the land in drinking water reservoirs watersheds (72 percent) is managed largely without ground disturbing activities and the U.S. Forest Service

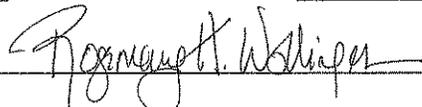
reports that water quality in the reservoir watersheds is substantially better than in surface watersheds in other parts of the George Washington National Forest.

WHEREAS, the 1993 George Washington National Forest Management Plan permits ground disturbing activities on most of the land (64 percent) in surface watersheds that provide drinking water through river intakes.

NOW, THEREFORE, be it resolved that the undersigned hereby support the following revisions to the George Washington National Forest Management Plan to ensure the quality and quantity of drinking water sources within the forest boundaries:

- The U.S. Forest Service shall formally identify all the drinking watersheds serving reservoir and surface water resources within the George Washington National Forest.
- The U.S. Forest Service shall establish management objectives that encompass the health of the entire drinking watershed, in order to ensure that conditions within the watershed will maintain, protect and enhance drinking water quality.
- The U.S. Forest Service shall gather more information to describe and assess watershed conditions, develop a plan to systematically monitor water resource programs and obtain all data pertinent to water quality and watershed conditions, in cooperation with other agencies, organizations, local communities and volunteers.
- The U.S. Forest Service shall seek to communicate more effectively with the localities that obtain drinking water from sources within the George Washington National Forest in order to ensure that the drinking watersheds are managed effectively, appropriately and for the public good.
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

Adopted by: Shenandoah Forum

Signature: 

Date: October 30, 2008



**mwgatewood@gmail**  
**.com**

11/16/2008 07:20  
AM

To: Mailroom\_R8\_George\_Washington\_Jefferson@fs.fed.us  
CC:  
Subject: [WebEmail] Forest Plan revision

## Begin Transmission ##  
USDA Forest Service - National Web Site Email Response Form.

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Posted on Sunday, November 16, 2008 at 7:20 Hours (Server time).

From: Mark Gatewood  
Email: mwgatewood@gmail.com

Telephone Number: 540 332 7850

Street Address:  
204 Seawright Springs Road  
Mount Sidney, Virginia 24467

Message Subject: Forest Plan revision

Message Contents:

November 15, 2008

George Washington Plan Revision  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear Planning Team:

The Southern Shenandoah Valley Chapter of the Potomac Appalachian Trail Club endorses the proposal submitted by Friends of Shenandoah Mountain on October 30, 2008. This proposal calls for the Forest Service to recommend in the new plan:

- Shenandoah Mountain National Scenic Area
- Skidmore Fork Wilderness
- Little River Wilderness
- Bald Ridge Wilderness
- Lynn Hollow Wilderness
- Laurel Fork Wilderness
- Kelley Mountain National Scenic Area

As you know, our chapter maintains trails in the Shenandoah Mountain area. Our members have individually adopted Grooms Ridge Trail, Jerrys Run Trail, Shenandoah Mountain Trail from Rt. 250 to Rt. 95, and North River Trail. We have also worked on Bald Ridge Trail. In addition to our work as volunteers, we choose to hike in the Shenandoah Mountain area, in Laurel Fork and in the Kelley Mountain area because they are some of the most special places in our region. As active volunteers and as people who enjoy hiking in these areas, we are very much in favor of all these proposals. We have looked at the boundaries carefully and support the boundaries shown on the maps that accompany the proposal. We are also in favor of the Ramseys Draft Wilderness boundary adjustment that would make the Shenandoah Mountain Trail a shared-use trail as a part of a larger protection strategy that would involve National Scenic and Wilderness designations.

We're also residents of the Shenandoah Valley and understand the role of the adjacent federal lands in providing us with clean, abundant water for present

and future needs. This alone would argue for the strictest protection of the higher mountain watersheds. With these areas protected, everyone wins - recreational users from bear hunters to mountain bikers, community planners and developers, and proponents of regional tourism.

As a hiking organization, we are in favor of protecting the wild character of the places we enjoy. The proposal by Friends of Shenandoah Mountain was developed in a collaborative way, and we have been involved in discussions about it over the past few years. We ask that you give it serious consideration as you decide which areas should be recommended for permanent protection.

Thank you for considering our comments, and thank you for the work you do to balance the many wishes and needs of forest users.

Mark Gatewood  
President  
Southern Shenandoah Valley Chapter

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The following information may only be used to monitor for SPAM and/or abuse
posts
using this automated response system. It may not be used for any other
purpose.
IP Address: 209.249.123.41
Browser-O/S: Mozilla/4.0 (compatible; MSIE 7.0; Windows NT 5.1; .NET CLR
1.1.4322)
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## End Transmission ##
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18 November, 2008

George Washington and Jefferson National Forests,  
Supervisor's Office  
5162 Valleypointe Parkway  
Roanoke, VA 24019-3050

Dear Supervisor,

On behalf of the Quality Deer Management Association (QDMA) I am writing to oppose the potential addition of 130,000 acres as Wilderness Areas in the George Washington National Forest (GWNF) revised Land and Resource Management Plan. The QDMA is an international nonprofit wildlife conservation organization dedicated to ethical hunting, sound deer management and preservation of the deer-hunting heritage. The QDMA has over 50,000 members including more than 3,000 of the nation's leading wildlife and forestry professionals. As such, QDMA is widely regarded as the most respected whitetail organization in the United States.

Forest management is an art and a science and it takes the blending of the two to be successful. Numerous wildlife species rely on forested habitats, and many require a mix of age classes to fulfill their habitat needs. Given that few wildlife species survive exclusively in a single age class of forest, and that forest succession continually marches toward an area's climax species, management programs are necessary to maintain healthy forests and biodiversity in the wildlife communities. Fortunately, silvicultural practices such as timber harvesting and prescribed burning can provide the range of habitat conditions needed by species ranging from frogs to songbirds to white-tailed deer.

Managers must possess the knowledge and skills necessary for sound forest management, and they need the ability to actively manage the forest. Currently, the GWNF contains 42,000 acres of Wilderness Areas, 8,000 acres in the Mt. Pleasant National Scenic Area and 240,000 acres of inventoried Roadless Areas. Combined, this means nearly one third (29%) of the GWNF is already off limits to active wildlife habitat development. As the forests in these areas continue to mature, the diversity and abundance of wildlife will continue to decline. If an additional 130,000 acres is afforded Wilderness designation that would bring the total to 420,000 acres or 42% of the GWNF that wouldn't permit active wildlife habitat work. The GWNF is already an aging forest as nearly 90% is over 70 years old and 39% is over 100 years old! This forest age structure has significant implication for wildlife populations, especially for those requiring younger habitat conditions.

Wilderness areas are important on the GWNF but so is active forest management. A balance of the two is best for forest health, wildlife populations and GWNF users and stakeholders. The addition of 130,000 acres to Wilderness Areas would significantly impact the ability to manage wildlife habitat on the GWNF, and therefore, the QDMA opposes this addition in the revised Land and Resource Management Plan. Thank you for consideration of this important matter.

Respectfully,  
  
James Broyles,  
Sportmen's Hunting Club, LLC, Managing Partner  
912 Hollywood Drive  
Chesapeake, VA 23320  
757-410-3688 (home)  
757-418-4313 (cell)  
SHC.LLC@cox.net

# COUNTY OF WARREN



County Administrator's Office  
Warren County Government Center  
220 North Commerce Avenue, Suite 100  
Front Royal, Virginia 22630

Phone: (540) 636-4600

FAX: (540) 636-6066

Email: [admin@warrencountyva.net](mailto:admin@warrencountyva.net)

*Douglas P. Stanley*  
County Administrator

November 19, 2008

## BOARD OF SUPERVISORS

\*\*\*\*\*

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District

United States Department of Agriculture  
Forest Service, Southern Region  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, Virginia 24019

Gentlemen:

The Warren County Board of Supervisors, at its regular meeting of November 18, 2008, adopted the enclosed resolution regarding proposed revisions to the George Washington National Forest Management Plan.

Sincerely yours,

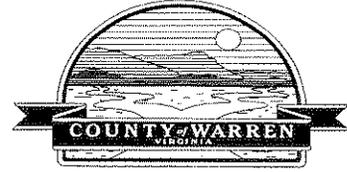
Douglas P. Stanley  
County Administrator

Enclosure

JD

cc: Fred Andrae, Scenic 340 Project, Inc.

# Resolution



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## *of the Board of Supervisors of Warren County*

### George Washington Forest Management Plan Resolution for Drinking Water Resource Management

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest, and

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "Improve watershed condition," and

WHEREAS, the provision of clean safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it, and

WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters, and

WHEREAS, drinking water sources within the George Washington National Forest serve an estimated 20,124 residents in Augusta County and the City of Staunton, 52,635 residents in Rockingham County, the City of Harrisonburg and the towns of Bridgewater and Broadway, 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, 12,500 residents in Front Royal and 41,840 residents in Frederick County, the City of Winchester and Middletown, and

WHEREAS, the watersheds of the five reservoirs in the George Washington National Forest provide drinking water for almost 100,000 people, including the Staunton and Elkhorn Lake Reservoirs, serving the City of Staunton and some Augusta County residents, and the Switzer Lake Reservoir, serving the City of Harrisonburg and some Rockingham County residents, and

WHEREAS, the watersheds of surface waters that flow from the George Washington National Forest, such as the North River and the North and South Forks of the Shenandoah River, provide drinking water to an additional 165,000 people in communities including Bridgewater, Broadway, Front Royal, Harrisonburg, Middletown, Strasburg, Winchester and the surrounding counties, and

WHEREAS, the greatest threats to water quality within the George Washington National Forest are ground disturbing activities, such as timber harvesting and road construction, which result in erosion and sedimentation, and

WHEREAS, under the 1993 George Washington National Forest Management Plan most of the land in drinking water reservoirs watersheds (72 percent) is managed without ground disturbing activities and the U.S. Forest Service reports that water quality in the reservoir

watersheds is substantially better than in surface watersheds in other parts of the George Washington National Forest, and

WHEREAS, the 1993 George Washington National Forest Management Plan permits ground disturbing activities on most of the land (64 percent) in surface watersheds that provide drinking water through river intakes.

NOW, THEREFORE, BE IT RESOLVED that the undersigned hereby support the following revisions to the George Washington National Forest Management Plan to ensure the quality and quantity of drinking water sources within the forest boundaries:

- The U.S. Forest Service shall formally identify all the drinking watersheds serving reservoir and surface water resources within the George Washington National Forest.
- The U.S. Forest Service shall establish management objectives that encompass the health of the entire drinking watershed, in order to ensure that conditions within the watershed will maintain, protect and enhance drinking water quality.
- The U.S. Forest Service shall gather more information to describe and assess watershed conditions, develop a plan to systematically monitor water resource programs and obtain all data pertinent to water quality and watershed conditions, in cooperation with other agencies, organizations, local communities and volunteers.
- The U.S. Forest Service shall seek to communicate more effectively with the localities that obtain drinking water from sources within the George Washington National Forest in order to ensure that the drinking watersheds are managed effectively, appropriately and for the public good.
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

BE IT FURTHER RESOLVED that the Warren County Board of Supervisors recommends that the United States Forest Service ensure they will be able to retain a full suite of management techniques and options necessary to protect the drinking water quality, and

BE IT FURTHER RESOLVED that the Warren County Board of Supervisors recognizes that trail—based recreational activities in the George Washington National Forest are valuable and wholly compatible with water quality management.

Adopted: November 18, 2008

  
Clerk, Board of Supervisors  
County of Warren, Virginia



**DIVISION OF NATURAL RESOURCES**

**Wildlife Resources Section**

**District 3**

**Box 38**

**French Creek, West Virginia 26218-0038**

**Telephone (304) 924-6211**

**Fax (304) 924-6781**

**Joe Manchin III**  
**Governor**

**Frank Jezioro**  
**Director**

November 20, 2008

Maureen Hyzer, Forest Supervisor  
George Washington/Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019-3050

Dear Ms. Hyzer:

The West Virginia Division of Natural Resources (WVDNR), Wildlife Resources Section (WRS), has reviewed the George Washington National Forest (GWNF) Plan Revision documents and maps.

This agency has a long-standing and established record of outstanding cooperation with the GWNF in West Virginia. This ongoing relationship, made possible through a Memorandum of Understanding since the mid 1940's, has produced substantial benefits to the citizens of West Virginia, the state's wildlife resources and their associated habitats on the GWNF. As the lead wildlife agency for the state, we are mandated by law to maintain viable populations of fish and wildlife species on private land, leased land and all State and Federal lands within the state's boundary. Currently, the WVDNR manages wildlife habitat on two National Forest Wildlife Management Areas totaling over 105,000 acres in the Lee and North River Ranger Districts of the GWNF. Because of this agency's active management program on the Forest, we offer the following comments and recommendations.

At previous meetings between our agencies, it has been noted that the open road density on the GWNF is currently higher than what is specified in the current plan. Our agency would like to see the trend reversed and the open road density reduced to conform to standards set forth in the current plan, which we feel are adequate.

The current Management Area (MA) concepts and boundaries in the existing Forest Plan for the Wardensville and Shenandoah Wildlife Management Areas are acceptable. Having specific MAs with established guidelines and standards for moving

the areas toward the Desired Future Conditions (DFCs), makes on the ground projects easier to implement. The current strategies to move MAs toward the DFCs are excellent. In West Virginia, timber markets and utilization have improved dramatically since the 1993 Plan Revision; conditions and circumstances are always changing. When lands are reclassified as unsuitable for timber production, they are removed from many wildlife habitat management activities. Currently, there are approximately 600,000 acres available for active wildlife management on the GWNF in MAs 14, 15, 16, 17, 18 and 22 and approximately 333,000 acres are available for commercial timber sales. Timber harvesting is the most efficient way of manipulating wildlife habitat through implementation of sound silvicultural systems necessary for managing oak-hickory and other types of forested ecosystems. There has been a dramatic shift on the GWNF to old growth forest ecosystems, due to the fact that DFCs in the Forest plan have not been met. Wildlife habitat diversity is rapidly diminishing as a result, which, in turn, will cause a dramatic drop in numbers of species that require early successional forested habitats. Currently, less than 1% of the forest is in the 0-10 year age class. This is undesirable and is contrary to the current GWNF DFCs.

The WVDNR recommends that the GWNF reverse this growing trend of “hands off” and revitalize the Forest Plan direction to fulfill the current DFCs. We believe the best way of doing so is to implement a strong timber management program supplemented by the current plan’s acceptable wildlife management techniques (with small modifications in some instances) listed under MAs 14, 15, 16, 17, 18 and 22 guidelines. We strongly request that the WVDNR continue to be considered an active partner with the GWNF Plan Revision Team concerning management (potential prescription changes and land allocations) of GWNF lands in West Virginia.

We are concerned about the direction the Forest Service is moving in Land Management Planning such as earmarking 370,000 acres of Forest as “Potential Wilderness Inventory.” We feel there should be more input from the environmental, forestry and wildlife sciences in the planning process. As cooperative resource managers on the GWNF, we have serious reservations about the Forest Service going in this direction of preservation during the Plan Revision process. The WVDNR is most troubled over the Big Schloss and High Knob potential wilderness areas. The Big Schloss currently serves the public well as an accessible Special Management Area and access restrictions would only encumber visitors. Most troubling is the High Knob area. It currently has an ongoing timber sale within its boundary! The area represents a core area for active wildlife and forest management and wilderness designation would negate this use.

Current and recent scientific research projects (Turkey Population Dynamics Study, Turkey Gobbler Study, Appalachian Cooperative Grouse Research Project, Cooperative Allegheny Black Bear Study, National Woodcock Initiative and numerous songbird and nongame wildlife studies and surveys etc.), has revealed updated habitat guidelines and life-cycle information on a number of wildlife species. This information, along with important species data from the West Virginia Wildlife Action Plan (2006),

Maureen Hyzer  
Page 3  
November 20, 2008

needs to be incorporated into the standards and guidelines of the active MA prescriptions in the GWNF Plan Revision. We would be glad to provide the GWNF Plan Revision team with the information from these studies. **Our agency is adamantly opposed to the creation of any wilderness areas on the GWNF in West Virginia. In addition our agency does not support any additional restrictive MAs or prescriptions on the GWNF in West Virginia.** The GWNF in West Virginia does not have any designated wilderness areas and we would like it to remain that way. Simply stated, wilderness designation is bad for wildlife because it severely restricts forest age class diversity, wildlife habitat diversity and landscape appeal to multiple wildlife species. The WVDNR takes seriously multi-state initiatives identifying early successional habitat needs for species like American woodcock, golden-winged warbler, chestnut-sided warbler and others. More wilderness designation serves only to restrict opportunities to provide and enhance wildlife habitat for these species.

Implementation guidelines under the current GWNF Plan are adequate, understandable, direct and site-specific and have the flexibility to be altered depending on site condition variables. As a cooperative partner in the management of the GWNF, the loss of any Management Area that has active management guidelines, negates the opportunity to conduct wildlife habitat management and manage viable populations of game and non-game wildlife. MAs allowing active wildlife and forest management are essential to providing diverse forest habitats for a myriad of wildlife species. Simply stated, many wildlife management objectives cannot be met without an active timber management program. Our nationally recognized research for the past 40 years has proven that active forest management, through sound silvicultural treatments, is the optimum means to reproducing and perpetuating important mast producing forest types and in maintaining viable and critically needed wildlife habitat types across the forest landscape.

We appreciate the opportunity to comment on the GWNF Plan Revision and associated documents. The comments in this correspondence represent our initial response to the Plan revision process. Should you have any questions or need clarification on our recommendations and comments, please feel free to contact my office.

Sincerely,



Ray Knotts  
Acting Supervisor, Game Management

cc: Paul Johansen  
Terry Jones



# COMMONWEALTH of VIRGINIA

## Office of the Governor

Timothy M. Kaine  
Governor

November 23, 2008

Ms. Maureen Hyzer  
Office of Supervisor  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, Virginia 24019-3050

Dear Ms. Hyzer:

As you know, I have called for full protection of national forest roadless areas consistent with the 2001 Roadless Area Conservation Rule. I am pleased that the Forest Service has been implementing the 2001 Rule, and it remains my firm belief that the agency should continue to do so for the long term in Virginia and across the nation.

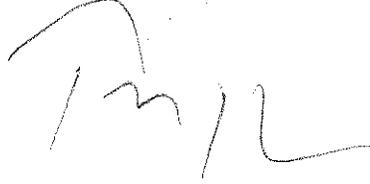
I understand that you are in the process of revising the management plan for the George Washington National Forest. I urge you to make certain that the new plan's management requirements for inventoried roadless areas are as protective as the provisions of the 2001 Roadless Rule. I also understand that, in revising the plan, you are updating the inventory of roadless areas and have identified over 100,000 more acres than were in the previous inventory. These newly-identified acres also should receive the level of protection consistent with the provisions of the 2001 Roadless Rule. And, I hope that you will recommend the best of these areas for wilderness designation by Congress so that their recreation, scenic, and natural values can be preserved permanently for future generations.

As we look to the future, we can see continued development pressure on natural and rural lands in the Commonwealth. Securing a significant portion of the national forest land base in its natural state by protecting roadless areas is a necessary element in providing long-term protection for clean water, backcountry recreation, and habitat for wildlife.

Ms. Maureen Hyzer  
November 23, 2008  
Page 2

Thank you for your efforts to be an excellent steward of our national forests. I appreciate your consideration of my concerns as you proceed with the management plan revision process.

Sincerely,

A handwritten signature in black ink, appearing to read 'TMK', with a long horizontal flourish extending to the right.

Timothy M. Kaine

TMK:cbd

c: Elizabeth Agpaoa, Southern Regional Forester, U.S. Forest Service  
The Honorable L. Preston Bryant, Jr., Secretary of Natural Resources



November 24, 2008

Supervisor of The George Washington and Jefferson N.F.  
5162 Valley Pointe Parkway  
Roanoke Va. 24019

Please accept these remarks made on behalf of the Skyline Chapter of The Society of American Foresters as it relates to the potential wilderness inventory for the revised George Washington National Forest Management Plan.

Wilderness preservation is a valuable resource to this nation and the world. Wilderness is clearly an important output from our public lands, one that demands serious attention and consideration by the national forest and ultimately the Congress. The present 107 million acres of wilderness in the U.S. contain some extraordinary examples of wilderness character. The 45,000 acres of designated wilderness on the GWNF are probably the best to be found given the amount of impact man has had on the eastern forests. However, while the SAF supports the concept and designation of federal wilderness, we are concerned how the 372,631 acres of inventoried potential wilderness on the GWNF will be evaluated and what future impacts to the forest and society will occur if they are recommended. Here are some of our concerns:

- Wilderness is for all intent and purposes a permanent land use designation. For this reason it is crucial that wide-ranging future impacts for wilderness designation be fully evaluated by Forest Service resource professionals for due consideration by Congress. They should not be swayed by special interest groups.
- While the GWNF has FSH 1909.13 method of screening potential wilderness, it must allow judging for unusual scenic beauty, special features and characteristics that make them worthy of designation. Ramsey's Draft might be an example of an eastern wilderness with such features as remoteness, trout waters, and large hemlock trees (before the adelgid). Some of the 37 potential wildernesses may meet some of the screens but few have characteristics to make them

special for wilderness. We will be glad to comment on individual candidates as to their wilderness quality and multiple use values.

- Wilderness designation restricts a wide range of forest management options. This includes controlling fire on national forest and adjoining private lands. No forest manipulation is allowed to benefit the forest trees and wildlife. Insect and invasive plant epidemics may not be controlled as with the adelgid and gypsy moth.
- Wilderness designation eliminates recreationists who now use some of these candidates for mountain biking, horse and jeep access. Hunters will not be able to extend their range.
- Tourists and recreational use normally will not increase significantly nor would it be desirable to cause over use.
- The Forest Service does not presently have the resources to manage the existing wilderness as required. How will they be able to manage more?

While the GWNF must evaluate these proposed wildernesses it behooves prudent land stewards to maintain management options, and not to foreclose them when the existing wilderness may be adequate in number and size (seven for 45,018 acres) to meet the present and future. Other less restrictive management designations could apply to most of these potential areas allowing a variety of multiple uses as they do today. After the evaluation, those potential wilderness that are not recommended should be returned to a multiple use designation and not remain on the inventory.

Thank you for accepting these comments on behalf of the Skyline Chapter of the Society of American Foresters.



Charles D. Huppuch  
SAF-GWNF Plan Evaluation Committee



**Bart Koehler**  
<bart.koehler@yahoo.com>

11/25/2008 05:35 PM

To: comments-southern-georgewashington-jefferson@fs.fed.us  
cc: bart.koehler@yahoo.com  
Subject: Comments on George Washington National Forest Plan Revision  
from TWS

11/25/08

Dear George Washington National Forest Planners:

On behalf of The Wilderness Society, our nationwide membership and especially our Virginia members, I wanted to strongly support a proposal submitted to you by the Friends of Shenandoah Mountain, which would provide lasting protections for the Shenandoah Mountain Region. Ultimately this proposal should be enacted into law by Congress.

This particular proposal is primarily focused on the George Washington National Forest lands located between highways 33 and 250, West of Harrisonburg, Virginia. It includes a significant National Scenic Area, plus several small but vitally important new Wilderness Areas within the NSA itself. It also includes an addition to the existing Ramseys Draft Wilderness, as well as definable, manageable and logical boundaries throughout. Again, this would be located within the proposed NSA boundaries. Furthermore, this proposal urges special protections for Laurel Fork Wilderness, and Kelly Mountain NSA ---- both of which are outlying areas beyond the Shenandoah Mountain NSA proposal.

I know you have the details included in the well-written, and completely research letter sent to you by the Friends of Shenandoah Mountain. Therefore, I won't repeat them here. I would say, however, that this is a well-reasoned, balanced, and responsible proposal that is truly home grown in nature. The proposal strives to keep this mountain massif "like it is" for today and for future generations, while allowing for a myriad of multiple uses (including Wilderness, mountain biking, hunting, hiking, fishing, horseback riding, etc....) to continue into the future. Important roads and motorized camping areas and other notable areas will remain open for the public's long term benefit and enjoyment. There is remarkable local support for this proposal from a broad spectrum of forest users and interested groups. Local folks have worked very hard for many years to put this compromise proposal together, and I truly believe that it is fully deserving of your strongest support.

With that said, I will close by saying that The Wilderness Society, our members nationwide, and especially our Virginia members are honored and

proud to support the homegrown compromise land protection proposal submitted to you by the Friends of Shenandoah Mountain.

Best regards,

Bart Koehler  
Senior Wilderness Campaigns Director  
The Wilderness Society's Wilderness Support Center  
Box 21836, Juneau, Alaska 99802

PS\* Please note: As you know, Wilderness is a recognized multiple use by the Multiple Use Sustained-Yield Act of 1960, which directs management of our national forests. Section 2 of this Act makes it abundantly clear that wilderness is a multiple use.\*



**PAT CHURCHMAN**  
<patchu2@verizon.net>

To: comments-southern-georgewashington-jefferson@fs.fed.us  
cc:  
Subject: see attached letter

11/26/2008 02:02 PM

To Planning Team:  
I am enclosing a letter for your consideration.  
Thank you.



Pat Churchman Shenandoah Mountain letter-1.doc

# Restoring Creation House Church



Trinity Presbyterian Church Phone: (540) 434-9556

725 South High Street  
Harrisonburg, VA 22801

Fax: (540) 434-1105

November 25, 2008

Planning Team  
George Washington National Forest

Dear Planning Team:

Restoring Creation House Church, a group associated with Trinity Presbyterian Church of Harrisonburg, is writing to endorse the Shenandoah Mountain proposal submitted by Friends of Shenandoah Mountain in a letter dated October 30, 2008. It is appropriate that we write this letter at Thanksgiving, as we are thankful for the mountain massif called Shenandoah. During the 15-year history of our house church, we have enjoyed Shenandoah Mountain many times and in many ways. We have hiked and picnicked as a group in the Hone Quarry area and at Braley Pond. We have admired the glorious sunset from Reddish Knob. We have taken the young people from our church on backpacking trips and day-long bushwhacking hikes to enable them to experience and celebrate the magnificence of God's creation. We have taught our youth how to maintain trails by leading worktrips on Grooms Ridge Trail. We have wandered up streams with toddlers and their families and eaten our lunch while perched on streamside rocks so that the children of our Church can discover interesting creatures, splash their bare feet in invigorating cold mountain water, and play joyfully in God's amazing creation. We enjoy Shenandoah Mountain every day as we look to the west at the beautiful ridgeline, and we especially enjoy the pure water our community receives from streams that flow from the mountain. Even as we grow older and less able to walk the steepest trails, we are grateful for the mature forests, the diversity of life, the beauty, and the opportunities for recreation, solitude, and spiritual renewal that Shenandoah Mountain offers.

We are thankful for all the many ways that Shenandoah Mountain enriches our lives, and we fully support designation of Shenandoah Mountain as a National Scenic Area with core areas as Wilderness. The areas recommended for Wilderness by the group make sense to us, as they are some of the wildest places left in Virginia. We are especially enthusiastic about supporting Laurel Fork as a Wilderness proposal. We've worshipped by the beautiful beaver dam on Buck Run, and we had a memorable backpacking trip with our youth on Locust Springs Trail. This area is so outstanding that it deserves strong and permanent protection. It is one of the most diverse and unspoiled places that we know of in Virginia. We also favor protection of Kelley Mountain as a National Scenic Area. This seems to make sense given its location next to Sherando Recreation area and the Blue Ridge Parkway and its popularity with mountain bikers.

It's important to us that Shenandoah Mountain, Laurel Fork, and Kelley Mountain are protected so that future generations can enjoy them as we have. We also believe that they should be protected for their own sake. As Martin Luther said, "God is wholly and personally present in the wilderness..."

Thank you for the opportunity to comment on the upcoming forest plan, and thank you for considering our comments.

Sincerely,

Pat Churchman

Mission Leader

Joshua Lewis  
104 Ludlow Drive  
Winchester, VA 22602

December 1, 2008

Maureen T. Hyzer, Forest Supervisor  
George Washington Plan Revision  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear Ms. Hyzer:

I wish to comment on the George Washington Forest Plan Revision. I enjoy spending a great amount of time outdoors, and I spend a good deal of my free time in the George Washington Forest, whether hiking, camping, or mountain biking. I have learned through others and the website that there is a possible planned revision of the status of some of the forest. While I applaud the idea to keep remote areas clean and enabling wildlife to have sufficient area to live freely, the classifying of certain areas as "Wilderness" concerns me. Due to what appears to me, among many others, a misconstruing of terminology in the Wilderness Act, mountain bikes have been banned from use in Wilderness Areas. Specifically, there are a few key areas that I do not wish to lose the right to ride my bicycle in.

First is the Massanutten East ridge from Buzzard Rocks to Duncan Hollow. It is a popular riding destination; in fact, Duncan Hollow is featured in many Mountain Biking touring books. Another area is the Big Schloss area, specifically the area at Vance's cove (It appears that Vance's cove itself is not affected?) Finally, the area from Route 33 (High Knob/ Gum Run area) southward to SR 678 (Green Valley) is another section I enjoy riding. In part of this last area, the annual Shenandoah Mtn 100 mountain bike race is held, and it is an event important to many of us. Also in this area is the Shenandoah Mountain trail, the southern section of which is considered an International Mountain Bicycling Association Epic -- it is a great ride.

Like I stated earlier, I am all for protecting the land, the vegetation, and the wildlife. But it needs to be done in such a way that allows bicycles. Bicycles are a low-impact form of travel, and hardly have any greater impact upon the environment than feet, and infinitely less than horses. If others have not already pointed you to studies that have demonstrated the low impact nature of mountain biking, I would be happy to point you to them. Most of these areas are pretty remote, and whether I am hiking or biking in them, I often see very few, if any, other people while I am out enjoying said areas. My biking in these areas does not hurt them any more than my walking in them.

Please take the areas I have mentioned into consideration when adopting a new plan for the forest. Please designate these areas something other than "Wilderness" so that those of us who enjoy the beauty, exercise, and connection to the environment by bicycle can continue to enjoy them.

Thank you.

Josh Lewis



"Jill Keihn"  
<jkeihn@shentel.net>  
12/03/2008 10:09 AM

To: <comments-southern-georgewashington-jefferson@fs.fed.us>, <kovercash@fs.fed.us>, <klandgraf@fs.fed.us>  
cc: "Jill Keihn" <jkeihn@shentel.net>, "Chris Price" <cprice@shentel.net>  
Subject: Resolution for Drinking Water Resource Management

Karen:

As mentioned during our telephone call today, a proposed resolution entitled "**George Washington Forest Management Plan Resolution for Drinking Water Resource Management**" (below) has been introduced to several localities within our planning district commission's region. Thus far, two localities (Page County and Warren County) have adopted the resolution; however, numerous others (town of Front Royal, City of Winchester, etc.) have expressed concern. Two key areas of concern seem to be the time commitment required by the jurisdictions to attend additional meetings and the redundant tasks asked of the F.S. which are currently being conducted by my office in response to the DEQ regional water supply plan mandate. I would like to know the official position of the U.S. Forest Service in response to the proposed resolution. I am unsure of the origin of the resolution but it appears to be passed by private organizations including the Shenandoah Valley Network, Inc. and Scenic 340, Inc. Please advise me as to your position so I can make an informed recommendation for our localities.

In addition, it would be helpful if you or your staff could attend next week's Regional Water Resources Policy Committee meeting to discuss the resolution and answer questions by our localities along with those raised by the localities to our south. Both areas will be represented in the meeting. As we discussed during our conversation, I will send you an invitation to the RWRPC meeting requesting your attendance.

Thank you,  
Jill

Jill Keihn, Natural Resources Program Manager  
Northern Shenandoah Valley Regional Commission (NSVRC)  
103 East 6th Street  
Front Royal, VA 22630  
Tel: 540-636-8800 ext 209

### **George Washington Forest Management Plan Resolution for Drinking Water Resource Management**

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest.

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "Improve watershed condition."

WHEREAS, the provision of clean safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it.

WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies

within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters.

WHEREAS, drinking water sources within the George Washington National Forest serve an estimated 20,124 residents in Augusta County and the City of Staunton, 52,635 residents in Rockingham County, the City of Harrisonburg and the towns of Bridgewater and Broadway, 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, 12,500 residents in Front Royal and 41,840 residents in Frederick County, the City of Winchester and Middletown.

WHEREAS, the watersheds of the five reservoirs in the George Washington National Forest provide drinking water for almost 100,000 people, including the Staunton and Elkhorn Lake Reservoirs, serving the City of Staunton and some Augusta County residents, and the Switzer Lake Reservoir, serving the City of Harrisonburg and some Rockingham County residents.

WHEREAS, the watersheds of surface waters that flow from the George Washington National Forest, such as the North River and the North and South Forks of the Shenandoah River, provide drinking water to an additional 165,000 people in communities including Bridgewater, Broadway, Front Royal, Harrisonburg, Middletown, Strasburg, Winchester and the surrounding counties.

WHEREAS, the greatest threats to water quality within the George Washington National Forest are ground disturbing activities, such as timber harvesting and road construction, which result in erosion and sedimentation.

WHEREAS, under the 1993 George Washington National Forest Management Plan most of the land in drinking water reservoirs watersheds (72 percent) is managed without ground disturbing activities and the U.S. Forest Service reports that water quality in the reservoir watersheds is substantially better than in surface watersheds in other parts of the George Washington National Forest.

WHEREAS, the 1993 George Washington National Forest Management Plan permits ground disturbing activities on most of the land (64 percent) in surface watersheds that provide drinking water through river intakes.

NOW, THEREFORE, be it resolved that the undersigned hereby support the following revisions to the George Washington National Forest Management Plan to ensure the quality and quantity of drinking water sources within the forest boundaries:

- The U.S. Forest Service shall formally identify all the drinking watersheds serving reservoir and surface water resources within the George Washington National Forest.
- The U.S. Forest Service shall establish management objectives that encompass the health of the entire drinking watershed, in order to ensure that conditions within the watershed will maintain, protect and enhance drinking water quality.

- The U.S. Forest Service shall gather more information to describe and assess watershed conditions, develop a plan to systematically monitor water resource programs and obtain all data pertinent to water quality and watershed conditions, in cooperation with other agencies, organizations, local communities and volunteers.
- The U.S. Forest Service shall seek to communicate more effectively with the localities that obtain drinking water from sources within the George Washington National Forest in order to ensure that the drinking watersheds are managed effectively, appropriately and for the public good.
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

Adopted by: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# COUNTY OF WARREN

Warren County Government Center  
220 North Commerce Avenue, Suite 400  
Front Royal, Virginia 22630

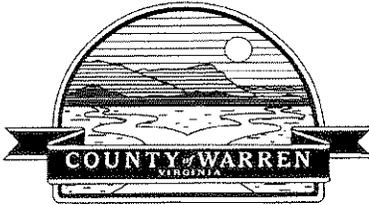
Phone: (540) 636-4600

FAX: (540) 636-6066

Email: grantscoord@warrencountyva.net

*Susan Musante*

Grants and Special  
Projects Coordinator



December 4, 2008

**BOARD OF  
SUPERVISORS**

\*\*\*\*\*

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District

USDA Forest Service, Southern Region  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear Forest Service:

On behalf of the Warren County Board of Supervisors, I have enclosed a copy of a resolution adopted by the Warren County Board of Supervisors on November 18<sup>th</sup>. This is being submitted as part of your public input period on the GW National Forest Management Plan revision process. Please let me know if you have any questions.

Sincerely,

Susan Musante

cc: Fred Andreae, Scenic 340 Project, Inc.

# Resolution



## *of the Board of Supervisors of Warren County*

### George Washington Forest Management Plan Resolution for Drinking Water Resource Management

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest, and

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "Improve watershed condition," and

WHEREAS, the provision of clean safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it, and

WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters, and

WHEREAS, drinking water sources within the George Washington National Forest serve an estimated 20,124 residents in Augusta County and the City of Staunton, 52,635 residents in Rockingham County, the City of Harrisonburg and the towns of Bridgewater and Broadway, 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, 12,500 residents in Front Royal and 41,840 residents in Frederick County, the City of Winchester and Middletown, and

WHEREAS, the watersheds of the five reservoirs in the George Washington National Forest provide drinking water for almost 100,000 people, including the Staunton and Elkhorn Lake Reservoirs, serving the City of Staunton and some Augusta County residents, and the Switzer Lake Reservoir, serving the City of Harrisonburg and some Rockingham County residents, and

WHEREAS, the watersheds of surface waters that flow from the George Washington National Forest, such as the North River and the North and South Forks of the Shenandoah River, provide drinking water to an additional 165,000 people in communities including Bridgewater, Broadway, Front Royal, Harrisonburg, Middletown, Strasburg, Winchester and the surrounding counties, and

WHEREAS, the greatest threats to water quality within the George Washington National Forest are ground disturbing activities, such as timber harvesting and road construction, which result in erosion and sedimentation, and

WHEREAS, under the 1993 George Washington National Forest Management Plan most of the land in drinking water reservoirs watersheds (72 percent) is managed without ground disturbing activities and the U.S. Forest Service reports that water quality in the reservoir

watersheds is substantially better than in surface watersheds in other parts of the George Washington National Forest, and

WHEREAS, the 1993 George Washington National Forest Management Plan permits ground disturbing activities on most of the land (64 percent) in surface watersheds that provide drinking water through river intakes.

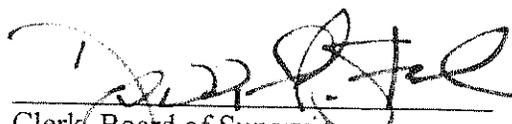
NOW, THEREFORE, BE IT RESOLVED that the undersigned hereby support the following revisions to the George Washington National Forest Management Plan to ensure the quality and quantity of drinking water sources within the forest boundaries:

- The U.S. Forest Service shall formally identify all the drinking watersheds serving reservoir and surface water resources within the George Washington National Forest.
- The U.S. Forest Service shall establish management objectives that encompass the health of the entire drinking watershed, in order to ensure that conditions within the watershed will maintain, protect and enhance drinking water quality.
- The U.S. Forest Service shall gather more information to describe and assess watershed conditions, develop a plan to systematically monitor water resource programs and obtain all data pertinent to water quality and watershed conditions, in cooperation with other agencies, organizations, local communities and volunteers.
- The U.S. Forest Service shall seek to communicate more effectively with the localities that obtain drinking water from sources within the George Washington National Forest in order to ensure that the drinking watersheds are managed effectively, appropriately and for the public good.
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

BE IT FURTHER RESOLVED that the Warren County Board of Supervisors recommends that the United States Forest Service ensure they will be able to retain a full suite of management techniques and options necessary to protect the drinking water quality, and

BE IT FURTHER RESOLVED that the Warren County Board of Supervisors recognizes that trail—based recreational activities in the George Washington National Forest are valuable and wholly compatible with water quality management.

Adopted: November 18, 2008

  
Clerk Board of Supervisors  
County of Warren, Virginia



County of Page  
Office of  
Environmental Coordinator

Chris Anderson  
Coordinator

101 S. Court Street  
Luray, Virginia 22835

canderson@pagecounty.virginia.gov  
gypmoth@shentel.net

Phone: (540) 743-4808

Fax: (540) 743-1419

RECEIVED DEC 08 2008

December 5, 2008

USDA Forest Service, Southern Region  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear USDA Forest Service Personnel,

Please include the following resolutions in the comments submitted regarding the George Washington Forest Management Plan revisions.

Thank You,

Chris Anderson  
Page County

Cc: Lee Ranger District

## **George Washington Forest Management Plan Resolution for Drinking Water Resource Management**

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest.

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "Improve watershed condition."

WHEREAS, the provision of clean safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it.

WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters.

WHEREAS, some surface water in the George Washington National Forest becomes ground water, especially when it reaches karst geology and whereas many Shenandoah Valley citizens rely on ground water for their drinking water.

WHEREAS, drinking water sources within the George Washington National Forest serve an estimated 20,124 residents in Augusta County and the City of Staunton, 52,635 residents in Rockingham County, the City of Harrisonburg and the towns of Bridgewater and Broadway, 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, 12,500 residents in Front Royal and 41,840 residents in Frederick County, the City of Winchester and Middletown.

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WHEREAS, the watersheds of surface waters that flow from the George Washington National Forest, such as the North River and the North and South Forks of the Shenandoah River, provide drinking water to an additional 165,000 people in communities including Bridgewater, Broadway, Front Royal, Harrisonburg, Middletown, Strasburg, Winchester and the surrounding counties.

WHEREAS, the greatest threats to water quality within the George Washington National Forest are ground disturbing activities that result in erosion and sedimentation.

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Adopted by: SHENANDOAH VALLEY SWCD

Signature: D. M. Fulk, CHAIR

Date: 11/6/08



# COUNTY OF PAGE

117 South Court Street  
Luray, Virginia 22835  
(540) 743-4142  
Fax: (540) 743-4533

Board of Supervisors:  
Tommy R. LaFrance - Chairman-At-Large  
Charles M. Hoke - District 1  
Larry A. Sours - District 2  
J. D. Cave - District 3  
Gerald M. Cabbage - District 4  
Carol Lee Fischer-Strickler - District 5

County Administrator:  
Mark Belton

#08-40

## George Washington Forest Management Plan Resolution for Drinking Water Resource Management

**WHEREAS**, the U. S. Forest Service is in the process of revisiting its 1993 Land and Resource Management Plan for the George Washington National Forest,

**WHEREAS**, the U. S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "improve watershed condition",

**WHEREAS**, the provision of clean safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it,

**WHEREAS**, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters,

**WHEREAS**, some surface water in the George Washington National Forest becomes ground water, especially when it reaches karst geology and whereas many Shenandoah Valley citizens rely on ground water for their drinking water,

**WHEREAS**, drinking water sources within the George Washington National Forest serve an estimated 20,124 residents in Augusta County and the City of Staunton, 52,635 residents in Rockingham County, the City of Harrisonburg and the towns of Bridgewater and Broadway, 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, 12,500 residents in Front Royal and 41,840 residents in Frederick County, the City of Winchester and Middletown,

**WHEREAS**, the watersheds of the five reservoirs in the George Washington National Forest provide drinking water for almost 100,000 people, including the Staunton and Elkhorn Lake Reservoirs, serving the City of Staunton and some Augusta County residents, and the Switzer Lake Reservoir, serving the City of Harrisonburg and some Rockingham County residents,

**WHEREAS**, the watersheds of surface waters that flow from the George Washington National Forest, such as the North River and the North and South Forks of the Shenandoah River, provide drinking water to an additional 165,000 people in communities including Bridgewater, Broadway, Front Royal, Harrisonburg, Middletown, Strasburg, Winchester and the surrounding counties,

**WHEREAS**, the greatest threats to water quality within the George Washington National Forest are ground disturbing activities that result in erosion and sedimentation,

**WHEREAS**, under the 1993 George Washington National Forest Management Plan most of the land in drinking water reservoirs watersheds (72 percent) is managed without ground disturbing activities

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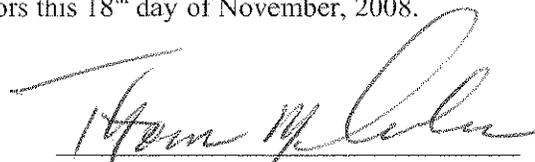
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Adopted by the Page County Board of Supervisors this 18<sup>th</sup> day of November, 2008.

  
Tommy R. LaFrance, Chairman  
Board of Supervisors

  
Dr. Thomas M. Cardman  
Acting County Administrator

**George Washington Forest Management Plan  
Resolution for Drinking Water Resource Management**

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest,

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "improve watershed condition",

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NOW, THEREFORE, be it resolved that the undersigned hereby support the following revisions to the George Washington National Forest Management Plan to ensure the quality and quantity of drinking water sources within the forest boundaries:

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- The U.S. Forest Service shall seek to communicate more effectively with the localities that obtain drinking water from sources within the George Washington National Forest in order to ensure that the drinking watersheds are managed effectively, appropriately and for the public good.
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

Adopted by: Page County Water Quality Advisory Committee

Signature: Charles Yewton

Date: 11-7-08



Planning.comments.f  
orm@svinet2.fs.fed.u  
s

To: comments-southern-georgewashington-jefferson@fs.fed.us  
cc:  
Subject:

12/06/2008 07:43 AM

Submitted by: William L. Braford<br>At: wlb@bluechipforestry.com<br>Remark:  
Vegetation Management: I am concerned about the low rate of final harvests. We are entering a second or third 10 year age class that may show up 50, 100, 300 or 500 years from now with a noticeable age class deficiency due to a lack of forest regeneration during the years surrounding the year 2000. At best we might hope to get back to a scheduled harvest rate in another series of 10 year age classes. I believe that we need to manage our forests to keep them healthy and productive. Good intentions to provide for old growth forests on our entire forest may well result in the opposite effect for future generations. If, for example, we are hit with castastrophic event such as a windstorm or insect outbreak that affects older, larger and less vigorous trees we could be left with one 0 -10 year age class over a gigantic area. We would then lose the old growth, most of the timber value and will be faced! , again, with too large of a percentage of one age class.  
<br>



"chris solloway"  
<solloway@gmail.com>  
>

12/06/2008 03:09 PM

To: jsmalls@fs.fed.us, kovercash@fs.fed.us  
cc: comments-southern-georgewashington-jefferson@fs.fed.us  
Subject: Proposed Wilderness Designation for Big Schloss

Dear Jim and Karen,

I'm writing to record my formal support for designating the Big Schloss area as part of wilderness designation under the George Washington National Forest "Forest Plan Revision" process. While I support designated wilderness status for all areas described by the Wilderness Society as "Virginia's Mountain Treasures," the Big Schloss area has a special place in my heart as I've spent much time hiking the area and have become acquainted with its features (both wild and man-made). I feel the area serves not just as one of Virginia's "treasures" but, indeed, as one of America's "treasures" as well. While the bulk of federal wilderness lands are located in the Western US, there is a woeful shortage of these protected areas in the Eastern US (an astonishingly low 4% of lands currently are protected under a wilderness designation in the GWNF). I believe that the values associated with low-impact recreation on these lands, as well as the aesthetic and moral implications of keeping these lands wild, tip the scales toward formal wilderness designation.

Thank you for your consideration, and please feel free to contact me should you require additional information.

Sincerely,

Chris Solloway  
6403 W. Halbert Rd  
Bethesda, MD 20817  
301.320.0247



Megan Gallagher, Director

5618 Rock Hill Mill Road · The Plains, VA 20198 · 540-253-5162 · [www.shenandoahvalleynetwork.org](http://www.shenandoahvalleynetwork.org) · [meganinc@earthlink.net](mailto:meganinc@earthlink.net)  
The Shenandoah Valley Network links citizens groups working on issues of land use, land protection and transportation in Rockingham, Shenandoah, Augusta, Frederick, Page and Warren Counties.

December 9, 2008

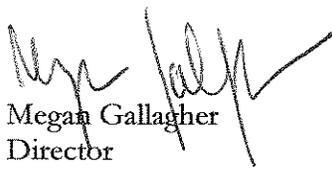
USDA Forest Service, Southern Region  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear USDA Forest Service Personnel,

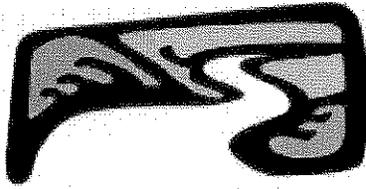
Please include the following resolutions concerning drinking water resources management in the comments submitted regarding the George Washington National Forest management plan revisions.

The resolutions were signed recently by representatives from the Shenandoah Riverkeeper, Friends of the North Fork of the Shenandoah, Shenandoah Soil & Water Conservation District and Shenandoah Valley Network.

Thank you.

  
Megan Gallagher  
Director  
Shenandoah Valley Network

cc. Lee Ranger District



**Shenandoah RIVERKEEPER®**

**Shenandoah Riverkeeper**  
P.O. Box 405  
Boyce, VA 22620  
540.837.1479

[keeper@shenandoahriverkeeper.org](mailto:keeper@shenandoahriverkeeper.org)  
[www.shenandoahriverkeeper.org](http://www.shenandoahriverkeeper.org)

### **George Washington Forest Management Plan Resolution for Drinking Water Resource Management**

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest.

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "Improve watershed condition."

WHEREAS, the provision of clean safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it.

WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters.

WHEREAS, drinking water sources within the George Washington National Forest serve an estimated 20,124 residents in Augusta County and the City of Staunton, 52,635 residents in Rockingham County, the City of Harrisonburg and the towns of Bridgewater and Broadway, 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, 12,500 residents in Front Royal and 41,840 residents in Frederick County, the City of Winchester and Middletown.

WHEREAS, the watersheds of the five reservoirs in the George Washington National Forest provide drinking water for almost 100,000 people, including the Staunton and Elkhorn Lake Reservoirs, serving the City of Staunton and some Augusta County residents, and the Switzer Lake Reservoir, serving the City of Harrisonburg and some Rockingham County residents.

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WHEREAS, the greatest threats to water quality within the George Washington National Forest are ground disturbing activities, such as timber harvesting and road construction, which result in erosion and sedimentation.

WHEREAS, under the 1993 George Washington National Forest Management Plan most of the land in drinking water reservoirs watersheds (72 percent) is managed



without ground disturbing activities and the U.S. Forest Service reports that water quality in the reservoir watersheds is substantially better than in surface watersheds in other parts of the George Washington National Forest.

WHEREAS, the 1993 George Washington National Forest Management Plan permits ground disturbing activities on most of the land (64 percent) in surface watersheds that provide drinking water through river intakes.

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- The U.S. Forest Service shall seek to communicate more effectively with the localities that obtain drinking water from sources within the George Washington National Forest in order to ensure that the drinking watersheds are managed effectively, appropriately and for the public good.
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

Adopted by: Jeff Kelble - Shenandoah Riverkeeper

Signature: Jim Shultz

Date: 10/29/08



## **George Washington Forest Management Plan Resolution for Drinking Water Resource Management**

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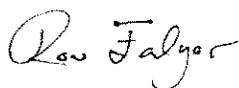
WHEREAS, the 1993 George Washington National Forest Management Plan permits ground disturbing activities on most of the land (64 percent) in surface watersheds that provide drinking water through river intakes.

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- The U.S. Forest Service shall seek to communicate more effectively with the localities that obtain drinking water from sources within the George Washington National Forest in order to ensure that the drinking watersheds are managed effectively, appropriately and for the public good.
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

Adopted by: Friends of the North Fork  
of the Shenandoah River

Signed by;



Date: 11/06/08

Friends of the North Fork  
of the Shenandoah River

PO Box 746 Woodstock, VA 22664  
www.FNFSR.org 540.459.8550

**George Washington Forest Management Plan  
Resolution for Drinking Water Resource Management**

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest.

WHEREAS, the U.S. Forest Service's agency-wide strategic plan seeks to achieve six goals, including "Improve watershed condition."

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WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that provide public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters.

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- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to permanently maintain, protect and enhance drinking water quality.

Adopted by: Megan Gallagher, Director, Shenandoah Valley Network

Signature:

  
May W. Falloff

Date: October 17, 2008



December 12, 2008

George Washington Plan Revision  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear Sirs:

We are writing you to support several wilderness recommendations for the northern segment of the George Washington National Forest in Virginia and West Virginia. First, a word about us. We live in Northern Virginia but our hearts are in the Appalachians where we own a 109 acre farm on top of South Branch Mtn. in Hardy County, WV., approximately half-way between the G.W. and Monongahela National Forests. Indeed, from our pasture at the summit of Branch Mtn. we can see both of these wonderful public lands. Cow Knob, Great North Mountain, and the Dolly Sods are all in view. To show you that "we put our money where our mouths are", we have placed a conservation easement on the property.

Now to the matter of wilderness in the G.W. We strongly support proposals for the establishment of wilderness areas covering the Three High Heads (some 5000-plus acres in the Paddy Mtn. area) and Beech Lick Mtn., the latter to include approximately 17,000 acres. I have hiked the Paddy Mtn. region and it unquestionably qualifies as wilderness under the language of the 1964 Act. We wish that the Big Schloss could be designated as wilderness, but, if that is not feasible, then we think it would be a good idea to establish a National Scenic Area for the larger region between Wolf Gap and Route 55.

Moving a bit south, we endorse the proposal for a National Scenic Area for Shenandoah Mtn. between U.S. Routes 33 and 250. Hopefully, this could include such unique pockets of wilderness as Little River, Skidmore Fork, and an addition to Ramsey's Draft. Nearby, we endorse wilderness protection for Laurel Fork.

Forest management plans are usually revised only once every 12-15 years, and wilderness legislation is introduced only about once each generation, so we think that the Forest Service should use this opportunity to "do it right" by supporting citizen proposals for the establishment of Wilderness Areas and National Scenic Areas in regions where undisturbed lands are worthy of permanent protection. If our scenic and natural areas are not protected now, then trying to preserve them in the future will be a far more daunting task as population growth will undoubtedly lead to pressures for resource extraction and mechanized forms of recreation on forest lands. Our society needs to retain significant portions of our public lands in their natural state.

Robert and Nancy Huston  
*Robert Huston*  
*Nancy Huston*  
1600 Crestwood Lane  
McLean, VA, 22101 and  
8596 Howards Lick Road  
Mathias, WV. 26812



RECEIVED DEC 18 2008

December 16, 2008

USDA Forest Service, Southern Region  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

### **Comments on the GW National Forest Management Plan**

At the request of Community Alliance for Preservation, a citizens group that addresses land use and transportation issues in Rockingham County, the **town of Dayton in Rockingham County** considered and adopted a resolution requesting the Forest Service identify and protect drinking watersheds when developing its updated forest management plan. The resolution, signed by the Dayton mayor is attached. Any questions regarding this resolution can be directed to Rick Chandler, Town Manager, at 540-879-2241.

Also attached is the same resolution which has been adopted by Community Alliance for Preservation's board. Please include these comments in the public record as you update the George Washington Forest Management Plan.

Sincerely,

Kim Sandum, Executive Director  
Community Alliance for Preservation  
2879 Rawley Pike  
Harrisonburg, VA 22801  
540-209-2552

cc. Elwood Burge, North River Ranger District

**George Washington Forest Management Plan  
Resolution for Drinking Water Resource Management**

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Adopted by: Dayton Town Council

Signature: Judy A. Way, Mayor

Date: Dec. 8, 2008.

**George Washington Forest Management Plan  
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Adopted by: Community Alliance for Preservation

Signature: Kim Sandum, Executive Director

Date: 10/27/2008



Lynn Cameron  
<camerosl@jmu.edu>  
12/19/2008 03:18 PM

To: comments-southern-georgewashington-jefferson@fs.fed.us  
CC:  
Subject: comment on GW plan revision

Dear Planning Team:

I am writing to make a correction regarding a Wilderness boundary shown on the map that accompanied comments submitted by Friends of Shenandoah Mountain on October 30, 2008. Our map showed Puffenbarger Pond and its access road as being within the boundaries of the proposed Lynn Hollow Wilderness. This was an oversight on our part. The boundary should exclude Puffenbarger Pond and its access road. We plan to submit a corrected map soon.

Thanks.

Lynn Cameron  
Co-Chair  
Friends of Shenandoah Mountain  
(540)234-6273  
5653 Beards Ford Rd.  
Mt. Crawford, VA 22841

--

Lynn Cameron  
Coordinator of Library Instruction  
Liaison Librarian for Psychology Carrier Library  
James Madison University  
Harrisonburg, VA 22807  
(540)568-3826

"I only went out for a walk, and finally concluded to stay out till sundown,  
for going out, I found, was really going in"  
- John Muir (1838-1914)



**Lynn Cameron**  
<camerosl@jmu.edu>  
12/19/2008 05:07 PM

To: comments-southern-georgewashington-jefferson@fs.fed.us  
CC:  
Subject: comment on GW plan revision

Dear Planning Team,

Please accept the attached letter from Friends of Shenandoah Mountain indicating which groups collaborated in developing the Shenandoah Mountain Proposal. This letter is a supplement to the comments we submitted on October 30, 2008.

Thank you.

Lynn Cameron  
Co-Chair  
Friends of Shenandoah Mountain  
--

Lynn Cameron  
Coordinator of Library Instruction  
Liaison Librarian for Psychology Carrier Library  
James Madison University  
Harrisonburg, VA 22807  
(540)568-3826

"I only went out for a walk, and finally concluded to stay out till sundown,  
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- John Muir (1838-1914)



Supplemental letter.doc

December 19, 2008

Planning Team  
George Washington National Forest

Dear Planning Team:

I'd like to clarify that the Shenandoah Mountain Proposal described in a letter dated October 30, 2008, from Friends of Shenandoah Mountain is the result of several years of collaboration by the following groups:

Virginia Wilderness Committee  
Sierra Club – Virginia Chapter  
Southern Appalachian Forest Coalition  
The Wilderness Society

Shenandoah Valley Bicycle Coalition  
Charlottesville Area Mountain Bike Club  
Virginia Bicycling Federation  
International Mountain Biking Association

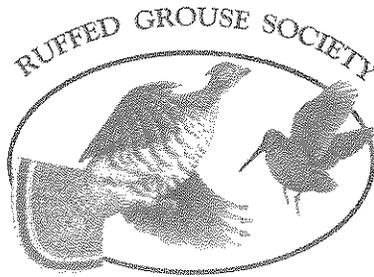
Facilitated by Bart Koehler of TWS Wilderness Support Center, members of these organizations hammered out an agreement on a protection strategy for Shenandoah Mountain, Laurel Fork and Kelley Mountain that we all enthusiastically support. As an outcome of this collaborative effort, Friends of Shenandoah Mountain was formed to protect and promote ecological and recreational values of the Shenandoah Mountain area. We are actively seeking support for the Shenandoah Mountain Proposal from other organizations and businesses. You may hear directly from those who endorse the proposal, and we will also keep you informed as we learn of new endorsements.

Thank you.

Sincerely,

Lynn Cameron  
Co-Chair  
Friends of Shenandoah Mountain  
5653 Beards Ford Rd.  
Mt. Crawford, VA 22841  
(540)234-6273  
[camerosl@jmu.edu](mailto:camerosl@jmu.edu)

Thomas Jenkins  
Co-Chair  
Friends of Shenandoah Mountain  
375 E. Wolfe St.  
Harrisonburg, VA 22802  
(540) 437-9000  
[tj@shenandoahbicycle.com](mailto:tj@shenandoahbicycle.com)



Mark Banker  
Senior Regional Biologist  
Mid-Atlantic

DEDICATED TO IMPROVING THE ENVIRONMENT  
FOR RUFFED GROUSE, WOODCOCK,  
AND OTHER FOREST WILDLIFE

P.O. Box 1171  
Lemont, PA 16851  
Cell: 412-720-6034  
Bus: 814-867-7946  
Fax: 814-867-8436  
Email: rgsbank@comcast.net

December 22, 2008

Ken Landgraf, Planner  
GW-Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear Ken,

I am writing to you to reiterate the Ruffed Grouse Society's opposition to increasing the amount of wilderness area on the George Washington National Forest. We understand that you have an obligation to assess the potential for wilderness on the Forest and that at this point in time nothing is being "proposed". Nonetheless, the amount of proposed wilderness that shows up as part of the revised plan takes on a greater significance. We understand that ultimately any decisions about wilderness are not under your control.

The Society assesses each Forest independently in terms of wilderness and other uses. We do not have a blanket opposition to wilderness. I have personally hunted, fished, hiked, camped, and canoed on Forest Service wilderness areas in Idaho, Montana, Minnesota, Michigan, Florida and every national forest in the southern Appalachians. Our team of biologists has had similar experiences from Alaska to Florida. We have experienced wilderness. We understand its value to some people. We are also in agreement that, given the management environment we have been operating under for two decades on national forests, we cannot support additional wilderness on the GW or any other national forest in the eastern U.S. Hunters benefit very little from wilderness, yet have supported the Forest Service and its programs through various conservation organizations and initiatives to the tune of hundreds of millions of dollars and man-hours for a century. They have been virtually ignored in the planning process, as have the game species they are so dedicated to conserving.

Active management for wildlife has, for all intents and purposes, been absent from the GW-Jefferson. Many species are on the decline because of it. The age structure of the Forest, which is more closely analyzed below, provides many of the same values as wilderness. The Forest acknowledged in the Jefferson plan revision that no species of wildlife requires old growth forest conditions in the Southern Appalachians.

Unfortunately, it is the Society's opinion that the National Environmental Policy Act has been used more to prevent activities opposed by preservationist groups than safeguarding

the environment. Clearly, the dozens of declining disturbance-dependent species that have been ignored by the flood of litigation over timber management are part of the environment, but their habitats have not been protected by NEPA, they have been lost due to the Act. Sadly, the Endangered Species Act has been used in much the same way. Until litigation is somehow controlled in a common-sense fashion and management resumes in a balanced way, designations that further insure the loss of critical habitats make little sense. The Jefferson is already lagging far behind plan goals for vegetation management, which were significantly reduced in the recent plan revision. Below, we discuss in detail the science that supports our position supporting an actively managed forest.

The George Washington National Forest is primarily a mature forest. Approximately 39% of the Forest is over 100 years-old and 80% is more than 70 years-old. Only 1% is less than 10 years-old and 3% less than 20 years-old. The GW is not a very structurally diverse forest. Early successional habitat is scarce, both on Forest land and private lands. Forest inventory and analysis data (USDA Forest Service 2006) for the counties containing national forest lands show that only 5.8% of the landscape is early successional, with only 1.8% of that habitat type being provided by national forest. The current level of forest management to maintain early successional habitats is well below current plan levels. Private land management is providing little additional habitat. Providing areas of extensive early successional habitat on the Forest would be well supported by the available evidence.

The age class structure of the GW National Forest has obvious implications for wildlife. Various studies have shown that a diversity of forest age classes is important for maintaining biological diversity. Thompson et al. (1992) found that some mature forest species actually increased in number in landscapes managed with even-aged silviculture rather than passively managed. Thompson (1993), Annand and Thompson (1997) and Duguay et al. (2001) suggested that, in forested landscapes, a mixture of uneven and even-aged management allowed for both mature and early successional forest songbirds to thrive. Pagen et al. (2000), Anders et al. (1998) and Vega Rivera et al. (1998) all showed that a suite of mature forest-nesting songbirds spend the post-breeding season in dense, regenerating clearcuts and other young forests until migration. Holmes and Sherry (2001) showed that some mature forest songbirds disappeared from an unmanaged forest after 30 years.

Thompson et al. (1992) found that all 9 forest breeding songbirds found in unmanaged, mature hardwood forests were present in forests managed through clearcutting and other silvicultural methods. Three closed canopy species were denser in the managed forest, 3 remained stable and 3 decreased in density. Conversely, none of the early-successional songbirds found in the managed forest were found in the unmanaged, mature forest. Anders et al. (1998) concluded that, in large tracts of mature deciduous forests, a mosaic of early-successional and mid-successional forest stands would accommodate both the breeding and post-dispersal habitat requirements of wood thrushes and other Neotropical migratory birds. Thus, providing a mix of young and older forest habitat may actually

improve habitat suitability for some closed canopy songbirds and likely will support a greater diversity of songbirds overall.

Songbird trends from 1980-2007 mimic habitat trends. Songbirds that use early successional habitat are declining at a far greater rate than songbirds that use mature forests. In Virginia as a whole, 41% of early successional songbirds declined between 1980 to 2007 while 18% increased. During the same time period, 31% of mature forest songbirds declined while 36% increased. Breaking down songbird trends by physiographic regions that correspond to the GW tells a similar story. A far greater proportion of early successional species declined in the ridge and valley and Blue Ridge mountains region from 1980-2007 compared to mature forest songbirds (Sauer et al. 2008).

Two spring drumming surveys and two fall hunter surveys were conducted to monitor ruffed grouse population status in Virginia. Spring 2007 breeding population indices were below-average based on drumming counts from roadside and spring gobbler hunter surveys. Cooperating grouse hunters reported 0.69 grouse flushed per hour during the 2007-08 hunting season. Fall 2007-08 flushing rates were the lowest ever recorded from cooperating grouse hunters. The long-term flushing rate is 1.13 birds per hour. Flushing rates also declined in many states in the Mid-Atlantic region. Bow hunter survey data indicate grouse observations were similar between the deer archery seasons in October 2006 and October 2007. The percentage of juvenile birds harvested (27%) by cooperating hunters was below-average (41%), suggesting recruitment was poor in 2007. Grouse hunter satisfaction during the 2007-08 season (2.9 on scale of 1-7) was similar to the previous year (3.0). Survey data suggest little change or a potential decline in Virginia's grouse populations during 2007. Trend analyses suggest significant annual declines in grouse breeding population levels based on drumming indices from roadside surveys (-2.7%) and spring gobbler hunter surveys (-2.7%) in Virginia over the past 15 years. However, spring breeding population indices based on drumming counts from both roadside and spring gobbler hunter surveys increased slightly in 2008 (Norman 2008).

The Southern Appalachian Black Bear Study Group recommended an interspersed of various aged hardwood stands that likely will benefit bears by decreasing the relatively negative effects that spatial and temporal failure of individual food sources may have in a given year. Mature hardwoods were very important for providing bears with hard-mast in fall and winter. Burned areas, forest openings, early successional stands, forest edges and clearcuts were identified as the most productive spring and summer food areas.

Extensive experience on many landscapes has shown that the most efficient way to create and maintain adequate early successional habitat is through the thoughtful application of commercial timber harvest. Dessecker and McAuley (2001), Woehr (1999), Hunter et al. (2001), and Askins (2000) all indicated that timber harvest will need to play a role in maintaining enough early successional habitat to support constituent wildlife in the future, and to improve mature forest habitat.

The golden-winged warbler is a state species of special concern. The golden-winged warbler atlas project (Cornell Lab of Ornithology) shows that goldenwings still breed in and around the GW, suggesting that its management on the Forest may be critical for maintaining the VA population.

Acorns are critical for ruffed grouse and other wildlife in the southern Appalachians (Servello and Kirkpatrick 1987, Norman and Kirkpatrick 1984, Thompson and Dessecker 1997, Appalachian Cooperative Grouse Research Project 2004). Recent data strongly suggested that successful reproduction and recruitment of young grouse into the fall population is closely tied to acorn crops the previous year in oak-dominated forests (Appalachian Cooperative Grouse Research Project 2004). Turkey, deer, bear, squirrel and a variety of other species also depend on acorns. Acorns and other seeds represent the most valuable and energy-rich plant food available to eastern wildlife in the dormant season. Acorn production can be 3 to 10 times greater than browse production in oak forests. A focus on oak management is important not only because of its value to wildlife, but also because of its dependence on disturbance for regeneration (Thompson and Dessecker 1997).

Oak decline is more prominent on national forest lands than on other ownerships due to the higher frequency of oak-dominated stands of advanced physiological age on sites with average to low site productivity. Without management that removes the mature overstory and allows oak seedlings to grow rapidly in sunlight, oaks eventually are replaced by more shade-tolerant tree species (such as red maple and black gum) that are of less value to wildlife. The decline in forest management has led to extensive tracts of very mature oak with very little regenerating, younger oak forests. Essentially, there is no mechanism for initiating the next generation of oak forests (Southern Appalachians Man and the Biosphere Cooperative 1994).

Further evidence of the need for increased management for early-successional wildlife is provided in several documents from the professional wildlife community. In November of 1999, the directors of 5 southern Appalachian states, including Virginia, sent the Regional Forester a letter expressing their concern over the lack of active wildlife management on national forests and the negative effects that it had on meeting statewide wildlife management objectives. They also expressed their concerns that the Forest planning process placed too much emphasis on setting aside large blocks of land that excludes wildlife management. These concerns obviously remain valid.

In April of 2000, the Chair of the Migratory Shore and Upland Game Bird Working Group (International Association of Fish and Wildlife Agencies) sent a letter to the Regional Forester urging the Forest Service to “address the declines of early-successional forest habitat and dependent wildlife, including woodcock and neotropical songbirds, through appropriate forest habitat management prescriptions”.

In June of 2000, the Board of Game and Inland Fisheries passed a resolution opposing policy that would decrease timber harvest and public access on federal lands, and noting that such policies are particularly devastating to ruffed grouse and American woodcock.

In November of 2002, the Southeasten Section of the Wildlife Society passed a resolution stating that "early-successional flora and fauna are in need of management to maintain viable populations on national forests" and urging the Forest Service to "resume a well balanced vegetation management program, where it does not now occur, to include timber harvest, prescribed fire and other appropriate management practices on all national forests". The resolution was enclosed with a letter to the Regional Forester.

Bob Duncan, Director of the VDGIF, also has testified before Congress that "Appropriate timber harvests produce a variety and abundance of habitats for wildlife more economically than is obtainable through other direct habitat improvements. An equitable distribution and diversity of habitats on national forests is an important consideration for Virginians". Mr. Duncan also noted in his testimony that "Given the current conditions of forest stands on these forests, habitat diversity will continue to decline unless timber harvests occur".

Thanks for the opportunity to comment and provide additional data to the planning process. Please do not hesitate to contact me if there is anything that needs clarified.

Sincerely,

A handwritten signature in cursive script that reads "Mark Banker". The signature is written in black ink and is positioned below the word "Sincerely,".

Mark Banker  
Senior Biologist

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We work with the people who work the land.

**Headwaters Soil and Water Conservation District**  
P.O. Box 70  
Verona, VA 24482  
(540) 248-6218 Extension 3  
FAX: (540) 248-1142  
[www.headwaters.vaswcd.org](http://www.headwaters.vaswcd.org)

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December 23, 2008

Maureen Hyzer, Forest Supervisor  
George Washington Plan Revision  
GWJNF, 5162 Valleypoint Parkway  
Roanoke, VA 24019

Dear Ms. Hyzer:

The Headwaters Soil and Water Conservation District has had a close, cooperative relationship with the George Washington National Forest for many years. We both have mutual goals and policies—to administer sound water quality and soil conservation based upon research and practical experience. In addition, we both are working toward sustainable forestry practices that benefit the public in both social and environmental ways. It is in this spirit of cooperation that we make the following recommendations to the revised forest management plan:

- We believe that the current soil and water standards set for riparian zones and flood plains have served the forest well and should be retained for the revised plan. We have observed past road building into timber units and find them professionally laid out and BMP's were in place and serving well. Riparian buffer zones were provided.
- We look for continued cooperation in the management of the flood control dams and reservoirs that are so important for public drinking water and flood protection.
- The revised plan should be guided by the Multiple Use Sustained Yield Act to give a balanced emphasis in the management of the variety of forest resources available. We believe that the forest will benefit using sustainable timber harvests in designated management areas using appropriate planning measures. Timber harvests can be compatible and support the management of fish and wildlife habitat, water quality, recreation, and aesthetics. The use of renewable, recyclable and biodegradable forest products from the forests is imperative for our nation's increasing resource needs.
- We recommend the plan give emphasis to the control of noxious weeds and invasive plants and insects. While the Forest Service has a national plan for invasives, little has been done and coordination with the State of Virginia has been weak.
- We recommend continual cooperation with the Va. Dept. of Game & Inland Fisheries in the restoration of trout waters and relocation of stream channels to their natural course.
- We believe the 1993 revised forest plan has adequate standards for the management of the forest resources and should not need significant changes. We are concerned how well the forest will be able to carry out the plan during a period of inadequate funds and reduced personnel.

We look forward toward continued cooperation with you and the forest personnel in finding ways to protect and manage our resources for the good of the American public.

Sincerely,

*Charles E. Horn/cp*

Charles E. Horn, Chairman



**Doug and Sue**  
<ds.norton@yahoo.com>

12/26/2008 12:15 PM

To: jsmalls@fs.fed.us, kovercash@fs.fed.us  
cc: comments-southern-georgewashington-jefferson@fs.fed.us  
Subject: comment letter on Big Schloss wilderness designation proposal

Karen, for the record this is my revised letter replacing the email of early December in which I incorrectly described mountain biking uses as allowable. Thank you for clarifying. Please discard my original letter and use this one instead.

The letter below still supports wilderness designation while also emphasizing that a slightly expanded list of allowable uses such as mountain biking and equestrian trail maintenance could be supported by a much larger coalition of users while still maintaining large forest patches that we need to protect.

Thanks,

Doug Norton

(Updated letter of December 26, 2008)

Dear GWNF Planners, Ranger Smalls, and Ms. Overcash:

As an avid user of the GWNF for 25 years I was pleased to note that the Forest Service is considering candidate areas for wilderness designation in connection with the GWNF Forest Plan Revision. I am writing specifically to support and strongly encourage the designation of the Big Schloss parcel as wilderness.

I know and appreciate National Forests as multiple use areas. I regularly hold a wood harvest permit for the GWNF. Yearly, I buy a forest fishing stamp and frequently fish Little Stony Creek, whose watershed lies mostly within the Big Schloss candidate wilderness parcel. I camp, hike, ski and photograph throughout the GWNF. I have volunteered in stream restoration, improved GWNF-bordering habitats I own, and conducted stream invertebrate censuses in the area. I have cleaned up after abusive users in the Lee District and occasionally have reported enforcement-worthy problems to the USFS. Also, I have hosted joint field training courses (free) in the GWNF with USFS, EPA, State, and county conservation personnel, and shared monitoring data with state and USFS personnel. But above all, I enjoy the Lee District of the GWNF as one of the most important areas in my life for these many reasons and many uses. I find that wilderness designation would be compatible with almost all of my uses, and abundant non-wilderness lands exist locally for those uses of mine that are not allowable.

Why is wilderness designation a good idea in general? As a lifelong professional in

environmental assessment and management at the landscape and larger scales I offer the following reasons:

- Total forest acreage is important for many reasons, but total CONTIGUOUS forest is far more important and far more threatened as widespread fragmentation reduces the size of remaining large areas of habitat.
- Contiguous patches of thousands of acres in size support threatened interior forest bird species, large mammals such as bear, and recreational use opportunities that could realistically be lost easily in the American east.
- Wilderness designation targets large remnant tracts of habitat and ensures they are not further reduced or fragmented. The Eastern US remnant wilderness is woefully underprotected. There is no agency that manages all wilderness, but it is part of USFS' duty to designate and manage some wilderness. USFS manages more wilderness than any other agency.

Specific to the Big Schloss parcel, I offer the following additional reasons why I would strongly encourage wilderness designation:

- the relative fame of the Big Schloss landmark and the breathtaking views still available from Big Schloss would be great reasons for protecting the forest that makes up those views.
- the area is well-known by passive recreationalists from a three-hour accessible travel radius that encompasses a population of over 5 million people.
- the Big Schloss parcel is significantly larger as a contiguous roadless patch than most other eastern forest wildernesses or candidates.
- a significant proportion of the parcel constitutes the Little Stony Creek upper watershed, which feeds a special regulations native trout stream. My personal monitoring data of water temperature over several years confirm that this trout population's survival depends on the maintenance of watershed forests that buffer the stresses of summertime heat. A forested upper watershed will be increasingly important to the survival of Appalachian strain brook trout regionally as global climate change continues.
- above all, based on work by landscape analysis researchers I know personally, the middle Atlantic highlands forest (of which the Big Schloss parcel, and the GWNF, is a part) is the largest remaining contiguous temperate forest on the planet (yes you read that right --- on the PLANET). We face an overwhelmingly important opportunity to maintain large areas of this forest by favoring the protection of contiguous patches wherever possible as a land management strategy while directing consumptive uses to the abundant edges and already fragmented areas. Overshadowed by all the public attention lavished on stopping tropical deforestation, we are risking the degradation of a major part of a globally important jewel in our own back yards if it is fragmented by timber sales, wind power development, and road intrusion;
- recent timber sales below road 92 suggest that timber interests might want to purchase extensive cuts in the upper watershed of little stony creek if allowed. Current economic hardships may just add fuel to that fire, but if so the related loss of multiple other uses would far outweigh the economic value of more timber

harvest from an unusually large forest patch for the eastern US. We cannot afford short-term “stimulus” uses of public lands that only slightly benefit the very few.

- the current uses of the proposed area would for the most part be able to continue. Trail maintenance with chainsaws may be prohibited, but the trails would continue to exist and be accessible for a variety of users.
- another risk associated with non-designation may involve increased pressure from ridgetop wind power development, which, despite its importance to domestic energy generation, has no place in scenic landmarks or as an intrusion deep into globally significant remaining contiguous forests. Wind power instead should be positioned closer to or on already-cleared areas such as valley fills or mountaintop removals.
- with only 4% of GWNF land in wilderness, a variety of passive forest uses for the public in the GWNF are under-supported. Even with Big Schloss designation the total in wilderness would still be well less than 10%, which leaves the full complement of other multiple uses amply provided for across 90% of the rest of the GWNF.

I'll offer a final thought about the Big Schloss wilderness proposal – I am aware that some significant part of the opposing views on wilderness designation are from mountain biking and equestrian groups. This seems a shame given how close to completely compatible these forms of passive recreation come to the other, fully compatible wilderness uses. I've never felt the least conflict with either group, and have heard that they too are mostly supporters of maintaining intact forests and non-consumptive uses. The two problems appear to be trail maintenance with chainsaws, which violates wilderness rules but significantly improves biking and equestrian experience in forested trails, and bicycle access being prohibited in wilderness areas. Ongoing dialogue between equestrian, biking and wilderness groups is commendable and I wish them success in seeking compromise routes, uses and boundaries.

Regarding this conflict among near-compatible views and uses, I wouldn't propose to alter wilderness rules, as there is a place for purely 'untrammelled' areas, but I do see an undeniable need, and opportunity, for a designation category that would fully protect forest yet allow an expanded slate of compatible uses (wilderness with a small versus capital W?). My point about maintaining the middle Atlantic highlands forest could be achieved without wilderness were such a designation to exist, but in the current absence of anything close, there is no alternative but to support the wilderness proposal strongly. Please consider what strong user alliances could easily be built around other near-wilderness levels of protection, simply by establishing a category of management that allows wilderness uses plus mountain biking and chainsaw use for trail maintenance sufficient to support non-motorized biking, equestrian and hiking activities.

Thank you for the opportunity to comment on this important matter. Please feel free to contact me if you have any questions:

email [ds.norton@yahoo.com](mailto:ds.norton@yahoo.com)  
mail Doug Norton  
1545 Millertown Road

cellphone

Edinburg, VA 22824  
703-725-5531

Sincerely,

Douglas J. Norton



"Pete Bsumek"  
<pkbsumek@gmail.com>

12/30/2008 03:10 PM

To: comments-southern-georgewashington-jefferson@fs.fed.us  
cc:  
Subject: Planning Process: Joint Letter on Wind Development

Dear Planning Team,

Please see the attached (pdf) letter regarding wind energy development on or near the GWNF.

Thank you,

Pete Bsumek  
Executive Committee



Shenandoah Group-Sierra Club GW Planning Wind Letter Final.pdf

December 29, 2008

George Washington Plan Revision  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Dear Planning Team:

We are currently aware of two areas in or near the George Washington National Forest that are being assessed by government agencies as potential sites for industrial wind energy development. The first is “the Shenandoah Mountain Project.” This site, addressed in a November 2007 US Fish and Wildlife Service letter, has been mapped as stretching from south of VA 33 between Skidmore Fork and Dry River roadless areas all the way up to the West Virginia/Virginia border in Rockingham county and Hardy County, West Virginia. This project appears to encompass both public and private land.

The second is the “Church Mountain Project.” This site appears to be entirely on land in the George Washington National Forest from Church Mountain to Great North Mountain in the Lee Ranger District in Rockingham, Shenandoah, and Hardy (WV) Counties. Based on information the proponent provided to the Federal Aviation Administration (FAA), this wind project as currently proposed would entail 131 turbines, each 440 feet tall, along 18 miles of ridgeline.

As with all development projects, and especially with regard to energy development projects that are in or adjacent to our national forests, it is important that all potential adverse environmental impacts are thoroughly considered in the siting and permitting processes. A rigorous analysis of potential adverse environmental impacts is just as important in cases where development projects are assumed to be “clean technology”—such as the industrial wind energy development projects that are proposed for land on or near the George Washington National Forest.

Therefore, in this letter we offer the following observations, concerns and objections related to the previously mentioned industrial wind energy development proposals. We also hope that our assessment of the issues related to industrial wind development in these two cases can help guide decision makers and stakeholders from government agencies, business and industry, and the general public as we all attempt to balance our need to develop more sources of renewable energy and our need to maintain healthy forest environments both today and tomorrow.

We start by noting that there is now a clear scientific consensus: global climate change is real, it is happening now, and if unchecked, it will significantly impact all

forms of life. Sea levels are rising, weather patterns are changing and ecosystems are being disrupted and degraded. We also note that an often overlooked, yet alarming, impact of global climate change is that it exacerbates other environmental stresses, such as deforestation and toxic pollution, that are already threatening a worldwide mass extinction of flora and fauna by the end of this century. Communities, industry and wildlife will all need to find ways to respond and adapt to climate change.

Reducing greenhouse emissions is the best way to limit the impacts of global warming. To do so Virginians will need to vigorously pursue policies that encourage conservation, energy efficiency, and a shift to renewable forms of energy such as wind and solar power. We support clean renewable energy development, including wind and solar, in Virginia. At the same time, we have serious reservations regarding the use of our limited national forest land as the location for these projects.

Because many wind projects tend to be large industrial developments, choices regarding wind energy development can be complex. Wind energy development is not environmentally neutral. Consequently, all decisions regarding proposed wind developments should be carefully considered. These considerations are especially important where our public lands are concerned and in cases where our public lands would be adversely affected by development projects on private lands. Careful consideration should also be given to cases where development on private land will significantly impair important environmental resources.

When evaluating proposals for wind energy development in, or near, our national forest lands the issue of habitat protection is a chief concern. It is important to remember that our native flora and fauna are threatened not only by climate change, but also by the accelerating degradation and destruction of their habitat. The science is clear on this point. Wildlife will have the best chance to adjust to a changing climate if we protect the habitat that they have left, and limit and eliminate non-climate environmental stresses such as habitat fragmentation, over-harvesting of timber, invasive species, disruptive human activities and pollution.

Thus, it is imperative that global climate change be addressed in ways that do not further eliminate, reduce or degrade wildlife habitat. In addition, because forests sequester carbon and are therefore important in mitigating climate change, and because forests confer many other benefits such as providing communities with clean water, fresh air, and recreational opportunities, we do not support industrial-scale energy alternatives that destroy, or substantially fragment existing forests.

In particular, we are concerned that the development of industrial wind facilities (it generally requires 2-5 acres of cleared land for **each** industrial sized wind turbine), transmission-line corridors, and corresponding access roads will result in the loss, degradation, and fragmentation of forest habitat; erosion and sedimentation of streams; potential continuing, long-term wildlife fatalities and injuries, and noise and light pollution of surrounding areas. The lack of reliable information regarding the impact of industrial wind development on migratory bird and bat populations along the ridge-tops

of the Alleghany Highlands is reason enough for serious concern and should give plenty of reason for caution and careful study.

The Appalachian Mountains in Virginia are well documented as having many globally unique, rare, threatened or endangered plant and animal species and communities, for which our public lands are becoming the last refuge from human development. Development projects on ridge-top forests can prevent wildlife from moving to higher elevations in response to global warming. In addition, the fragmentation of habitat can speed up the rates of warming in our forests making it difficult for many species to adapt to warmer temperatures, and hinder the ability of wildlife to migrate to other latitudes or longitudes in response to a changing climate. In this scenario extinction may be the inevitable result for many of our native flora and fauna.

Virginia's healthiest future lies in implementing policies for energy conservation, increased efficiency, such as implementing green building design standards at every governmental level, and the responsible development of renewable energy. Responsible development of renewable energy should begin with the promotion of decentralized energy generation that uses locally available renewable resources such as solar and small/appropriate-scale wind mills for individuals, farms and businesses, and communities. Larger-scale renewable development, such as industrial wind power arrays, should be concentrated and confined to areas that are already disturbed such as agricultural land, and areas that are already degraded such as cleared forestlands with substantial roads. In addition, most experts agree that the greatest wind energy resources in Virginia will be found offshore. We encourage and support an immediate and thorough analysis of these offshore options.

As we move forward with renewable energy development in Virginia it is important that we do not repeat the mistakes of the past. For too long, energy development has occurred without thoughtful public deliberation, without appropriate transparency in the processes that enable meaningful public involvement in decision-making, and without credible environmental review. It would be ironic indeed, if Virginians, in attempting to do the right thing, were to rush into renewable energy development without fully taking into account the impact that our decisions will have on our environments, our public lands and our communities. We should all remember that the industrial development of our national forests is not something that can easily be undone.

Therefore, it is imperative that all sites associated with the "Shenandoah Mountain Project" and the "Church Mountain/Great North Mountain Project" proposals be subject to thorough site-specific environmental review. These sites should also be subject to preconstruction monitoring for avian and bat use consistent with guidelines recommended by the U.S. Fish and Wildlife Service. Protection of state or federal endangered and threatened species is assumed. Significant adverse impacts to populations of sensitive wildlife species must be avoided.

Consistent with our previously stated concerns about industrial scale wind energy development in or near our national forest land, we offer the following objections and concerns with regard to the previously mentioned proposals.

**Shenandoah Mountain Project:**

1. The national forest land in this area is unsuitable for industrial wind development because of (1) all the national forest land above 2900 feet is in the Shenandoah Mountain Crest Zone (Many groups find all national forest land unsuitable for industrial wind turbine siting.); and (2) the important recreation assets including trails and the High Knob Lookout;

2. From the cleared private land north of the Cow Knob summit north along the VA/WV border ( approx 7.5 miles) and into WV to Reynolds Knob

This private ridgeline may be suitable for wind turbine placement because there are fewer national forest resources in play and because of existing road and power line access. The ridge top is cleared and mostly in pasture land. Because the surrounding national forest land is already fragmented by private land and the existing power line particularly on the eastern slope, this site is acceptable for wind development as long as (1) federally or state listed species are protected, and bird and bat populations, or other sensitive wildlife populations are not significantly adversely impacted; (2) compliance with the Conservation Agreement and the accompanying Conservation Assessment and Management Measures (1/25/94) for the Cow Knob Salamander is assured; (3) adjacent national forest resources are protected during the construction and ground disturbing phase, and erosion and sedimentation is properly controlled on the private land site; and (4), any forest disturbance is minimized.

3. South of Route 33

This area is unsuitable for industrial wind turbine development even on the thin strip of private land, because of the following important adjacent national forest resources: the inventoried roadless area, High Knob, bordering the ridge line on both sides; the proposed wilderness area, Skidmore Fork, on the eastern side of the ridge; the Shenandoah Mountain Trail running near the ridge line; and the historic High Knob Lookout providing views of the surrounding national forest for miles in all directions.

4. From Route 33 approximately six miles north to National Forest land

This thin strip of private ridge-top is unsuitable for industrial wind turbine development due to the following adjacent national forest resources:

- Uninventoried roadless areas on both sides of the ridge line included as Mountain Treasures in the 2008 TWS publication (Dunkle Knob- 8398 acres and Wildcat Ridge-8522 acres) that should be formally inventoried roadless areas.

- The adjacent national forest land in this area is unfragmented and serves as a core part of the Shenandoah Crest Zone for which the Forest Service and FWS have a formal management agreement to protect rare species.
- The Great Eastern Trail (an extension of the Shenandoah Mountain Trail) is designed to continue north from Route 33 up to the national forest land on the ridge and then cross to the east to run through the Beech Lick Knob roadless area.
- The area north of Route 33 is in the immediate viewshed of the restored, historic High Knob Lookout, which provides dramatic views of the surrounding national forest land in the area. (The thin strip of private ridge top with some clearing north of 33 prior to the national forest land is within five miles of the High Knob Lookout.)

### **Church Mountain / Great North Mountain Project**

#### **This area is unsuitable as a site for industrial wind turbines:**

- The entire site is on National Forest land. (Many groups oppose siting industrial wind turbines on National Forest land).
- The ridge-top is forested and unroaded except for one road that crosses the ridge east to west.
- The entire site lies within two uninventoried roadless areas that have been identified as special “Mountain Treasures” in the “Virginia’s Mountain Treasures” report issued by the Wilderness Society in 2008. Only Route 720 running east to west separates the two areas, Church Mountain and Falls Ridge. These areas should be inventoried roadless areas.
- The ridge top is the site of existing hiking trails and is part of the Great Eastern Trail being established by a variety of user groups as an alternative to the Appalachian Trail, running west of the AT from the Alabama/Florida state line to New York State. The areas are also home to a number of side trails connecting to the ridge around Orkney Springs and Liberty Furnace.

Sincerely,

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