

Comments on the George Washington National Forest Plan Revision
11 March 2007

Mark Gatewood
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Mount Sidney, VA 24467
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Please make these comments a part of the administrative record for the George Washington National Forest Plan Revision.

I have lived in Augusta County since 1988. The presence of the George Washington National Forest and Shenandoah National Park was a factor in our decision to accept a job and move here. I am currently president of the Southern Shenandoah Valley Chapter of the Potomac Appalachian Trail Club (PATC) and am a member of the Virginia Native Plant Society (VNPS) and the Augusta Bird Club. In the early 1990s, I led a team of volunteers from the VNPS in creating a plant inventory on the Augusta Springs Watchable Wildlife Area as the Forest Service was developing a trail and visitor facilities there. Under a Volunteer Agreement with the North River Ranger District, I lead a small crew maintaining trails in the Ramseys Draft Wilderness Area. With my PATC chapter, I have assisted in scouting the route for the Great Eastern Trail along Shenandoah and North Mountains.

Thank you for the opportunity to comment on the Forest Plan Revision. I look forward to working with you to see this project to its conclusion. Also, please know that you can expect continued involvement in Forest operations by the organizations mentioned above.

The George Washington National Forest has the opportunity to restore and maintain a large swath of the physical and cultural landscape of the Appalachians. I can't speak for the whole forest, only those parts I know.

- 1. Shenandoah Mountain** Shenandoah Mountain is a biological treasure. Its northern hardwoods and laurel thickets above 2,500 foot elevation provide nest sites for rare to uncommon birds including black-throated green, Blackburnian, cerulean, black-throated blue and Canada warblers and winter wrens. Golden-crowned kinglets, red-breasted nuthatches, brown creepers and red crossbills, northern birds which occasionally wander south along the Appalachians, find winter feeding areas in the conifers of Shenandoah Mountain. (Source: *Birds of Augusta County, Virginia, 1998*; personal observations). It should be noted that the cerulean warbler is losing nesting habitat in the southern Appalachians due to mountaintop removal for coal extraction; it remains a rare nesting summer resident in the mountains of western Augusta County.

Shenandoah Mountain will achieve national prominence with the development of the Great Eastern Trail, a new long-distance hiking trail stretching from New

York to Florida and incorporating the existing Shenandoah Mountain Trail. Because of its biological and ecological significance, Shenandoah Mountain should be given the highest level of protection.

- 2. Recreation** Recreation on the national forest is a major contributor to local economies, yet the forest's recreation budget continues to decrease. Look at the license plates in the parking lot at Mountain House (gateway to Ramsey's Draft Wilderness) on a summer weekend; people from all over the Mid-Atlantic states come to the GW. As Shenandoah Valley communities work to promote tourism as an economic force, visitors to the GW may find trails closed, picnic areas not mowed, toilets not cleaned.

Organized groups of horseback riders, hikers and mountain bikers are stepping into the breach to help with trail maintenance. These groups are in for the long haul, willing and able to be partners with the Forest Service in recreation management, but the Forest Service must recognize the importance of recreation to the local economy and restore the recreation budget.
- 3. Invasive exotic plants** The draft plan wisely includes the control of invasive exotic plants such as tree-of-heaven, garlic mustard, autumn olive and others as a major strategic element. Fast-spreading non-native plants have the potential to choke out native plants and make areas of the forest unsuitable for desired game and non-game wildlife species. Invasive exotics thrive on disturbed soil; they use roads and trails as pathways into new areas. Consider a best management practice requiring logging operators, trail crews and excavating contractors to thoroughly clean their equipment, rolling stock, tools – even the soles of their shoes – before coming on a new job, to avoid tracking in seeds of invasive plants. While the Virginia Native Plant Society is able to offer consultation and monitoring on a volunteer basis, the Forest Service must develop professional expertise in dealing with exotics. Once invasives become entrenched, only a chemical- and labor-intensive program of eradication will offer any hope of control.
- 4. Watershed protection** Future population and economic growth in the Shenandoah Valley relies upon a continued source of clean water. Augusta County relies for its water supply on the water that flows out of the mountains and into our reservoirs, wells and springs. All land-disturbing activities on the forest should be considered with respect to their impact on watersheds. Adopt and enforce the most stringent best management practices to protect water quality. The designation of wilderness and roadless areas on the national forest confers the highest possible level of protection on watersheds; consider designating these areas as investments in the future of communities downstream from the forest.
- 5. Clearcutting and logging** Logging is part of the Appalachian culture; mills are important contributors to local economies. Logging that takes place on the National Forest should be of showcase quality and should earn money for the

Forest. Subject clearcuts to the highest standards of best management practices to protect water quality and control erosion. Restrict clearcuts to elevations below 2500 feet. Avoid clearcutting on slopes greater than 15%. Consider the scenic impacts of clearcuts; a recent cut is in clear view from the Chestnut Ridge section of the Wild Oak National Scenic Trail.

Cc: Elwood Burge, District Ranger
North River Ranger District

George & Frances Alderson

112 Hilton Avenue
Baltimore, Maryland 21228

March 13, 2007

Forest Plan Revision
George Washington National Forest
5162 Valleypointe Pkwy
Roanoke VA 24019

Dear Forest Service:

Please include this letter as our comment on the "need for change" in the forest plans for the GW and Jefferson National Forests, as we will not be able to attend the public meetings. I (George) visited the GWNF several times and know many who live closer to the forest and go there often. In Maryland we have no national forests, so we depend on those in our neighboring states as a source of wilderness and other wild places.

We ask the Forest Service to give a high priority to the following:

- More wilderness areas are needed on the GW and Jefferson to protect wild places with the most secure protection available, under terms of the Wilderness Act.
- Protect all roadless areas under the terms of the Roadless Area Conservation Rule (regardless of whether the rule remains in force).
- Identify all old growth stands and protect them.
- Identify the oldest stands of second-growth and manage them for older ages, aiming for 200 to 300-year old stands in the long run. These older stands have important benefits for watershed and wildlife values.
- In all forest management, use native species and native ecosystems of the region as your fundamental goal. Avoid using non-native species for reforestation.
- Identify those areas most appropriate for nonmotorized recreation, and prohibit ATVs and other off-road vehicles from entering those areas. If lands are needed for ORVs, keep these well separated from nonmotorized areas, so the noise and impacts will not contaminate lands where nonmotorized visitors go in search of a quiet, natural forest.
- Identify watersheds that are municipal water sources, and protect these against commercial logging, road-building, and other surface disturbance.

Thank you for considering our views. Please put us on the notification list for future public participation. We can be reached at the above postal address or by email at: george7096@comcast.net.

Sincerely,



George & Frances Alderson

AA
2/17/74

Dear Supervisor Itzyer:

I am writing to express my concern over the current management practices that favor logging and energy businesses rather than protecting our national forests.

As the George Washington National Forest's management plan is revised, I urge you to ensure that the public is fully engaged in the plan and that a plan is created based on scientific evidence not the interests of big business.

Thank you,

Brian Franklin

PO Box 6001

Arlington VA 22206

March 13th 2007

U. S. Forest Service,

We were unable to attend the meeting in Harrisonburg on Sat. Mar. 10th concerning the future of A. W. N. F. We would like to let you know where we stand on a few issues. We enjoy having the opportunity to use this land for: hunting, trapping, fishing, camping, hiking, biking, photography, etc. We do our best to abide all regulations while on the property. We are very avid outdoorsmen. We thank you for having these meetings to listen to the public input. With that being said, ^{let} us tell you about an issue we have concerns about. We would like to start off by saying by no means we are against the cutting of timber. But we are totally against the over cutting of our great resources, especially clear cutting. We're very aware of all issues good and bad. We would like to ask if you would take our thoughts and concerns in consideration and stop catering to the logging industries, and ~~keep~~ keep our forest lands the way they were attended. Thank you very much (aww)

RECEIVED MAR 19 2007

WAA

FRANCISCO FARMS

343 BETHEL GREEN ROAD
STAUNTON, VIRGINIA 24401
March 16, 2007

TELEPHONE
(540) 885-3008

Dear Ms Hyzer

Enclosed are the materials I spoke with you about at the forest plan meeting in Lexington, VA.

I am a general farmer, with pasture, cropland, woodlands and raise Christmas trees as well. My original concern with National Forest management was the effect that timber and pulp harvest had on the price that I am offered for my timber. The timber industry reacts as any commodity does to supply and demand. The USFS and the VDOF have both told me that the percent of wood coming from national forest is so little that it doesn't have any effect on market price. Yet if this was true why is the timber industry and loggers fighting to cut as much as possible from the national forest?

The oil industry sells approx. 9 million barrels of oil a day but their analyst say it is the last 100,000 barrels that set the price. Timber works the same way, the small percent that you all are cutting from the national forests acts as a cushion to help keep the general market price low, not only for what is bought from you, but for the whole private market in the state and thus my timber. Dr. Sullivan a forestry economics Prof. from VA Tech spoke with me about this and he added: That in a county such as Augusta where there are a lot of national forest acres I can also suffer from excess "opportunity" for tracts of timber offered to the industry. This can have a very serious economic effect on private woodlot bids in counties with national forest timber available.

Now after researching USFS management it appears logging on the scale it has been carried out in the past is simply not needed for our public forests. The report I am sending you from Quentin Bass, an employee of the USFS, provides credible evidence that our national forest do not need to be logged and intensively managed as they have been in the last century. This drive for even-aged and contrived successional forests has only been carried out in the 20th century for the benefit of the timber industry. Thus it seems to be in the best interests of the general public as well as private woodlot owners for the USFS to keep intact old mature forests and restore woodlands that have been mis-managed in the past through clearcuts and burning. From what I heard at the revision plan workshops the benefits from recreation in our forests will outweigh all the timber losses the USFS has had for decades.

Sincerely
W. J. Francisco

George Washington Plan Revision
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

Both the old George Washington Plan and the newer Jefferson Plan leaves a lot to be desired. They both set up to much of the public land in a Preservation mode of management. We don't need any more areas set up as Wilderness or Wilderness Study areas. Therefore do not in the revision add any more such areas. Also the so called "Roadless Areas" are a joke. They are no more than designated wilderness areas which did not follow the law concerning the establishment of wilderness areas. Only Congress can designate wilderness areas. Therefore if the powers to be insist on keeping the areas designated as "Roadless" then the management of such areas must direct that timber harvest and other active management of the resources in those areas be permitted and directed. Many of these areas contain old roads and even some more developed roads. They have not lost the characteristics of roads. Therefore basically they are not roadless. Helicopter logging can be permitted in these areas which would improve the habitat for many species of wildlife while keeping the access as at present. Also the forest could use temporary roads into these areas to assist in the needed active management. More than prescribed fire is needed in these areas. They should not be managed the same as designated wilderness areas.

Thank you,

Ruby S. Jean
PO BOX 351
FAIRFIELD VA.
24435

George Washington Plan Revision

George Washington & Jefferson National Forest
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

It seems like every time a National Forest Management Plan is revised or prepared every effort is made to eliminate the sale of timber. Evidently many think the National Forest is a National Park or at least want the Forest managed like a Park. These National Forests were set up to provide for the flow of clean water and to provide timber for the needs of the citizens of the nation. That was the reason Virginia gave the Federal Government permission to purchase land for the National Forest. Recreation and wilderness management was added later but for the last 20 years preservation management appears to have been set up as the primary management direction for this public land. This is wrong and was a major mistake. Preservation was not the intent of the establishment of these forests. This land has a large negative impact on the local government's tax base. In addition the Forests provide little to the local economy except through the sale of timber products. It is time for the Forest Service to provide for a balance and needed form of management of all the resources. The sale of more timber will provide for better wildlife habitat, better deer, turkey and grouse hunting, more jobs and a healthy forest for the future generations. No more preservation set asides.

Loggers must pay to harvest trees on the national forests, hunters and fishermen must buy a national forest stamp to hunt and fish, utility companies must pay for the use of land for right-of-way corridors, and fees are also charged for special events. I feel it is time for those who hike, bird watching, disperse recreation users and similar users also pay a fee. This money collected would be used to improve the conditions on the forest. If they are not willing to pay a fee to get a user permit then such areas as wilderness and preservation areas should not be provided.

Thanks for giving me chance to comment.

Judd Smith Logging Inc.
Judd Smith

540 969-1160

George Washington National Forest Plan Revision

George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

To improve the wildlife habitat according to the report of the monitoring of what happened to various species over the last 14 or 15 years it is very apparent that more timber must be harvested over the entire forest. The sales are needed to provide more early succession habitat and reduce the amount of old growth. These sales must be dispersed over the entire forest. This is also important to improve the economy in the local areas. Jobs are needed in the forest zone of influence and timber harvest will provide many of the needed jobs.

Also the Forest needs to divest itself of the isolated tracts of land that can never be made a part of the main forest holdings. They have been on the land exchange plan for years and little progress on this has been made. It is very important that this type of land be placed back in the local tax base. The best and quickest way to accomplish this is to seek approval from Congress to sale this land on the open market and fair market value. The money derived from the sale then should be used for one of three things:

- (1) Buy land that would fill in private land that has National Forest land on at least three sides.
- (2) Build an office for the James River Ranger District.
- (3) Purchase right-of-ways to provide management access into those areas where such access is needed.

This should be one of the priorities in the revised plan along with an assigned annual sale volume of 50 to 60 million board feet. In conjunction with these objectives do not set any land in a preservation type management area. Do away with the remote or back country areas along with so called roadless areas. Put the entire forest under active management except for the existing designated wilderness areas.

Thank you for giving my comments consideration as you proceed to revise the plan that never worked.

Donald E. Reaves
2997 Fontella Rd
Coleman Falls
Va 24536

George Washington National Forest Plan Revision
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

Forget the old George Washington Plan and the Jefferson Plan. They leave a lot to be desired and I would think you would have learned a lot over the last decade and a half. By using the old plans as a guide you are not following the new process as you should. This revision is not to make decisions but instead is to give guidance. Hopefully it won't waste the tax dollars like the old process, so enjoyed by the radical environmental movement, did.

The monitoring done under the old plan clearly shows that more timber harvest is needed. The monitoring points out some alarming trends for the resources on the forest, especially wildlife. The population of deer, grouse and many songbirds are on an alarming downward trend. This must be reversed and the revision must provide for this. It is very apparent that the old plan did not provide for enough harvest of timber. If the harvest of timber had been at a level it should have been then the above population trend would not have taken place. To correct this trend it is crucial that you provide for the sale of between 50 and 60 million board feet of timber a year. I know your budget is low and not where it should be but it will rebound in a few years. It always has and the revised plan must prepare for when that takes place. Budgets are not static, they have their ups and downs, but you must provide a strategic plan that takes that in consideration and be prepared for the future.

Timber harvest is very important to the local economy of these rural areas. The harvest of timber provides good jobs with good pay and benefits. It is not seasonal like recreation and tourism. Recreation and tourism does not provide good full time jobs, they are seasonal and at best minimum wage. Due to the age of the forest it cannot wait for more harvest of timber forever. You must provide for a better and more balanced age class distribution. This can only be obtained through timber sales. Prescribe burns will not correct this situation. Such fires will not provide the habitat that deer, grouse and many song birds require. I ask that the George Washington again become an active managed forest and part of the local economy. This public land has a very negative impact on the local tax base since the local governments cannot access taxes on it. To compensate for this it is imperative that more timber is sold from this land.

Please keep my comments upper most in your mind as you work on the Revision.

JEFF BRITT LOGGING
1063 ALLEN BRANCH RD.
EAGLE ROCK, VA. 24085

George Washington National Forest Plan Revision
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

Don't use the Jefferson plan as a guide in the preparation of the George Washington plan revision. As the saying goes one size don't fit all. There are many differences between the land area of the Jefferson and the land area of the George Washington, therefore forget what is in the Jefferson Plan. The Jefferson Plan don't fit the resources and location of the George Washington. The Jefferson Plan also has too many management areas which are also fragmented into smaller areas. Such designations would give poor directions for the management of the George Washington. Also under the new process such decisions are not to be made in this revision. The Revision is said to be a strategic plan and only should give broad directions. Leave the details to the development of a project under the NEPA directions. Therefore if management area designations are to be used then they should be large areas and not a bunch of small areas scattered over the forest. Make such areas contiguous and with a land mass of at least 100,000 areas in a location. Don't make any wilderness study areas in the revision. There are enough designated wilderness areas in Virginia.

If one must have designated wilderness areas that are established by Congress then they must be managed as wilderness. Keep the "wild" uppermost in the management of these areas that are presently designated as wilderness. Eliminate all trails into and through these areas. Do not establish any trails in these areas. Those who want such areas should be prepared to bushwhack into and through such areas. If a fire occurs in these areas then watch it but let it burn. Spend no tax dollars in the suppression of such fires in these areas. If a fire burns out of the wilderness area then that is soon enough to take action, do not take suppression action while the fire stays within the boundary of the wilderness area. If Wilderness areas are to be areas where man is the visitor the areas must be managed as natural and wild. Tax dollars are not to be wasted on these areas. Let nature take its course in these areas – fires, disease, storms, insects, etc.

Thanks for consideration of my thoughts and comments.

J. M. Deacon

209 Seward St. Ln.
Lexington, VA
24450

GEORGE WASHINGTON PLAN REVISION

Thank you for the effort to hold the public workshops. It was good to get people together discussing their views of the forest. Unfortunately, many have little knowledge of the biological or workings of the forest and the laws that the GW must operate under. They are so focused on their wants for the forest.

#1. What do I like about the current management:

- The forest is available for so many uses by man and animals when so much of the country is being lost to development.
- The future vision of the forest is excellent and hopeful.
- There are still dedicated professionals who see the whole forest and are devoted to providing best management practices on the forest for many uses.
- With funding and personnel constraints- many of the recreation facilities are still being kept up and even improved – e.g. Sherando Lake.

#2. What do I think needs to be changed how the GW is managed.

- The forest is an aging forest with 45% over 100 years. Many tree species are reaching maturity or are over mature. The forest is vulnerable to disease and insect attack.
- There has been a drastic drop from 640,000 acres of land suitable for commercial timber harvesting to 333,000 acres. This leaves a huge land base for over-mature timber. Presently only about 800 acres is being regenerated per year. This is unacceptable.
- Eliminating so much land from harvesting is damaging to animal, bird and plant life that depend upon early successional forest for part of their habitat. Commercial harvesting to create more acres of younger stands, spread out in a planned fashion is a must for future management. The revised plan must raise the acres of regeneration to at least 4,000 acres per year to achieve 10% to 14% early successional habitat.
- Roadless Areas- The RARE 11 standards for inventorying roadless areas was flawed. Many areas contained old roads and even working roads. Some had boundaries along open roads and lands easily available for management. Some areas surround suitable commercial land and block access. The revised plan should review these roadless area segment that are not really roadless and return them to the suitable timber base.
- The revised plan must consider how the forest can contribute to clean fuels for the future. This is a Forest Service wide priority. Bio-fuels from wood chips and waste is coming on line. The forest will be needed to help supply some amounts of low-grade trees for bio-fuels. This could be used as a management tool to help economically thin younger age stands for future growth.

- Add to the plan- Elizabeth Furnace and Camp Roosevelt CCC Camp to the list of historical sites.

-- The plan's vision of the George Washington NF. is wonderful but, will not be reached until we have a more balanced approach, based upon the Multiple Use Act. Additional on-the-ground professionals with the knowledge and fortitude will be needed to carry it out.

February 1, 2007

Editor
Northern Virginia Daily
152 N. Holliday St.
Strasburg, Va. 22657-0069

Sir:

More than 19 million Americans safely participate in target shooting. Their numbers break out into subsets of people who enjoy shooting handguns, shotguns and rifles. Add special-interest shooters such as muzzleloader enthusiasts, and the total number of active shooters jumps even higher! Target shooting varies from leisurely hobbies and collegiate athletics to the Olympic games.

Surveys show nearly 80 percent of Americans support hunting, although less than 10 percent actually participate. These 18.5 million hunters contribute more than \$30 billion annually to the U.S. economy and support more than 986,000 jobs. They are the primary supporters (more than \$1.5 billion per year) of conservation programs that benefit all Americans who appreciate wildlife. The average American hunter spends over \$17,000 on hunting equipment during their lifetime.

Firearms-related accidents have declined sharply even as gun ownership in American is rising. More than half of all households now own firearms, yet accidental fatalities are at an all-time low—down 60 percent over the last 20 years. For decades, the firearms industry has emphasized education to ensure the safe and responsible use of its products. This effort and those by other organizations are why the shooting sports and hunting are rated among the safest forms of recreation. Some 40 million people of all ages safely participate in these activities.

When buying hunting-related equipment, apportion of the excise tax goes to the Federal Assistance in Wildlife Restoration Program and about \$4 million each year in Virginia. The Virginia Department of Game and Inland Fisheries has the support of 19 non-profit conservation organizations dedicated to conservation and education. All support safe and responsible firearms handling and shooting. Hunters and fishers must

purchase a license along with a National Forest Permit before they can participate in their sport.

In conclusion, I am in favor of a shooting range in Shenandoah County. I feel the Lee Ranger District of the National Forest is a suitable location for a shooting range within the thousands of acres they possess.

Sincerely,

A handwritten signature in cursive script that reads "Paul B. Racey". The signature is written in black ink and is positioned above the typed name and address.

Paul B. Racey
1171 Edinburg Gap Road
Edinburg
February 1, 2007

Citizens Task Force on National Forest Management
2428 Guilford Avenue
Roanoke Virginia 24015

March 20, 2007

Maureen Hyzer, Supervisor
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019

Re: George Washington Plan Revision

The Citizens Task Force has the following comments on the 2-15-07 draft Comprehensive Evaluation Report.

CHAPTER 1 Report Purpose

General Comments:

The provision of the 2005 planning regulation pertaining to preparation of the Comprehensive Evaluation Report states:

(1) Comprehensive evaluations. These evaluate current social, economic, and ecological conditions and trends that contribute to sustainability, as described in § 219.10. Comprehensive evaluations and comprehensive evaluation reports must be updated at least every five years to reflect any substantial changes in conditions and trends since the last comprehensive evaluation. The Responsible Official must ensure that comprehensive evaluations, including any updates necessary, include the following elements:

(i) Area of analysis. The area(s) of analysis must be clearly identified.

(ii) Conditions and trends. The current social, economic, and ecological conditions and trends and substantial changes from previously identified conditions and trends must be described based on available information, including monitoring information, surveys, assessments, analyses, and other studies as appropriate. Evaluations may build upon existing studies and evaluations.

The draft CER dated 2-15-07 does not provide sufficient information about the current social and economic conditions and trends that contribute to sustainability. While interesting, the information in the appendix B about County Comprehensive Plans does not provide the required analysis. Information from the Southern Appalachian Assessment should be utilized in the analysis of social and economic conditions and trends that contribute to sustainability.

The information in the CER about ecological conditions and trends that contribute to sustainability is scattered under various Issue topics. It would be helpful to have that information organized into a coherent picture so it is easier to evaluate. Information from the Southern Appalachian Assessment should be utilized in the analysis of ecological conditions and trends that contribute to sustainability.

CHAPTER 2 New Laws, Regulations, Policy, or Emerging Issues

In addition, we would like to have the George Washington Forest Plan be more similar to the plan on the Jefferson to make management of the two Forests more compatible and easier to understand. (p. 5)

Comment: The draft plan that is posted on the GW web site is a radical departure from the Jefferson Plan in most aspects. The current 1993 Plan is far more similar in both form and substance to the 2004 Jefferson Plan. However, we strongly support revising the draft GW Plan to make it more similar to the JNF Plan.

The Jefferson Forest Plan was revised in 2004. That revision process was conducted in conjunction with the revision of Forest plans on four other Appalachian Forests and followed the Southern Appalachian Assessment. (p. 5)

Comment: A glaring omission from the discussion in this chapter about sources for the Comprehensive Evaluation Report, specifically regarding “a need for change” in the GW Plan, is the Southern Appalachian Assessment. The Southern Appalachian Assessment was a multi-agency effort, with major leadership and participation by the Southern Region of the U.S. Forest Service, to review the available scientific information and develop a conceptual framework of the Southern Appalachian bioregion.

From this review, analysis, and synthesis, the Forest Service derived 12 issues that were salient for the revision of Southern Appalachian Forests that were undertaking Plan Revision. The Regional Forester had determined that these Forest Plans should be revised in concert so the management of the National Forest lands, a significant portion of the Southern Appalachians, would be consistent and coordinated. The Southern Appalachian Assessment consciously included the area covered by the George Washington National Forest within the bioregion. There was some discussion whether the George Washington and the Pisgah/Nantahala Forests should also revise their plans jointly with the other Southern Appalachian Forests, but it was decided that the GW had completed a lengthy revision in 1993 and the Pisgah/Nantahala had completed a Significant Amendment at about the same time.

The scientific basis that the SAA established for viewing the ecosystem remains solid. In a few instances, science may have filled out or modified the SAA synthesis, but the SAA remains an important compendium and synthesis of best available science for the region. Moreover, the decision to coordinate the management of the individual National Forests within that region remains salient for all the Southern Appalachian Forests--even more so for the George Washington National Forest, which is administered jointly with the

Jefferson NF. In the ideal world there would be only a single management plan for the George Washington and the Jefferson National Forests, but an historical accident in Plan revision timing resulted in two Plans instead of one. However, this accident should not be allowed to determine disparate management direction for the two Forests. Within the constraints of the new planning rule, the revised GWNF Plan should be as consistent with the Jefferson Plan to the fullest extent possible.

The GW staff has largely used the existing 1993 Plan issues as the framework for examining the “need for change”. See Chapter 3 of the CER. We believe this framework is inferior to the framework of the SAA in determining what issues are relevant to examine in the revision. While there is substantial overlap in the issues, we urge that the Forest staff carefully review the SAA to see what additional information is relevant and what additional issues should be examined to determine a need for change. While the framework of the 1993 Plan may be a starting point for evaluating “need for change,” it is not a sufficient framework.

CHAPTER 3 Evaluation of Existing Issues

ISSUE 1 Biodiversity

A. Fragmentation

However, the steep declining trends shown by USGS BBS data in populations of northern flicker across the larger regions of the Blue Ridge Mountains and Ridge and Valley Regions, which are year-round residents, indicates a marked decrease in the type of habitat they rely upon, especially open woodland habitat and the ecotone habitat between forested and patches of early successional woody or grassy/shrubby habitat. An increase in management activities such as prescribed fire and timber management is needed to restore open woodland habitat and create early successional habitat .(p. 11)

Comment: The northern flicker was selected as an indicator of cavity nesters, not early successional habitat or open woodland. To suddenly use this species as an indicator for early successional habitat is a dubious use of this indicator species. Moreover, the decline in northern flicker populations across the larger regions of the Blue Ridge Mountains and Ridge and Valley Regions is not mirrored on the GW. Instead there is a slight increasing trend on the GW. (p. 11) It is unclear how the writer of this section of the CER leapt to the conclusion that there should be an increase in management activities such as prescribed fire and timber management to restore open woodland on the GW. At best, it could be inferred from the data that the management of the GW is providing an improving habitat for cavity nesters, while those cavity nesters are finding a decline in this habitat on lands outside the GW.

The CER identifies the following Tentative Options or Proposed Actions for Change on page 11:

C-1. Add an objective for open woodland restoration.

Comment: Creation of open woodland habitat is not a response to a fragmentation issue in the 1993 GW Plan.

Open woodland restoration may have some value as wildlife habitat for a select few species and for deer that have reached pest numbers in some forest areas. It duplicates some of the habitat provided by grassy wildlife openings. This habitat has some value for demonstrating an historical biological landscape. Moreover, this type of habitat is also generally perceived as aesthetically attractive to most forest visitors. It does have associated with it high maintenance costs for protecting the trees and stabilizing the size and quality of the understory. However, considering declining budgets for active management for wildlife, aesthetics, and historical habitat restoration, there should be careful analysis to calculate how much of this habitat can be created and maintained over time with funds likely to be available. We believe the acreage in an objective for open woodland restoration should be modest. We suggest that no more than one area be established per district. We urge this area be shown on the Forest map as a special area, with an identification number of 9H, which is used in the JNF Plan for Management, Maintenance and Restoration of Forest Communities.

Characterized by an open mature tree canopy and a stable understory of native grasses, forbs and shrubs, larger patches of open woodlands are needed to provide habitat needs for an increasing number of species that are declining in population, or are already rare and/or endangered across the forest.

By not providing for open woodland restoration, the plan would not be able to provide an important habitat component for these species. Interior, unfragmented habitat would continue to be provided to support those species that need it. Open woodland habitat and early successional habitat would continue to decrease and contribute to a continuing downward trend in the northern (common) flicker. (p. 12)

Comment: As already noted, the population of northern flickers appears to be increasing on the GW, not decreasing. If there is an indicator species that supports the claim that open woodlands are needed “to provide habitat for an increasing number of species that are declining in population, or are already rare and/or endangered across the forest”, the evidence should be included in the CER. The claim that a population decline for the northern flicker indicates the need for more open woodland habitat should dropped.

B. Old Growth

The CER outlines the following Tentative Options or Proposed Actions for Change:

C-1. Adopt the Region 8 guideline and its ages; Remove acres of old-growth forest types 1, 2a, 2b, 2c, 5, 10, 22, 24, 25, 28, and 37 occurring on lands suitable for timber production from suitable base. All OGFT 21 on suitable acreage will be inventoried for old-growth characteristics prior to any timber harvest project. (similar to current Plan). All other existing potential old growth is allocated to a network of small, medium, and large patches for developing or restoring old growth conditions.

C-2. Adopt the Region 8 Guideline and its ages; Remove acres of old-growth forest types 1, 2a, 2b, 2c, 5, 10, 22, 24, 28, and 37 occurring on lands suitable for timber production from suitable base. All OGFT 21 and 25 on suitable acreage will be inventoried for old-growth characteristics prior to any timber harvest project. All other existing potential old growth is allocated to a network of small, medium, and large patches for developing or restoring old growth conditions.

C-3. Adopt the Region 8 Guideline and its ages; Remove acres of old-growth forest types 1, 2a, 2b, 2c, 5, 10, 22, 24, 28, and 37 occurring on lands suitable for timber production from suitable base. OGFT 21 and 25 on suitable acreage will not be inventoried for old-growth characteristics since acreage and patches existing and developing will be enough to meet late successional or old growth needs and no inventory or analysis will be done prior to any timber harvest project.

C-4. Defer all Plan allocations until we have a better inventory on where existing old growth exists on the Forest. Follow Jefferson Forest Plan process of looking at old 1930's aerial photography along with ground-truthing inventory. From that, create a GIS data base inventory of known existing old growth. Continue to inventory all stands using the R8 criteria and follow Region 8 process at the site-specific timber sale project level for newly identified old growth.

The Forest has identified C-3 as its proposed action.

Comment: We would have thought the intense conflict during the last decade over cutting old growth on the GW would have been sufficient to convince staff that there was a need for a change in the GW plan direction that allowed the cutting of some old growth types, on a case-by-case basis. A more prudent approach was adopted during the development of the Jefferson Plan. We strongly urge that you adopt the following course of action based on the JNF management direction:

C-5 Adopt the Region 8 Guidelines and its ages. All acreage currently identified through the Regional guidelines should be mapped and included in Special Area 6A, 6B, or 6C, depending on the forest type identified, and managed under guidelines adopted from the standards from the JNF prescription. Additions to the inventory of old growth should occur when identified through additional field work. A map showing areas generally suitable for a network of large, medium, and small patches should be included in the plan.

C. Conversion

The CER says no change in the plan is warranted (p. 24).

Comment: We agree that no planned conversion to pine should be allowed, and that the revised plan should have a guideline that reiterates the 1993 plan guidance that planned pine conversion is not appropriate for the Forest.

D. Riparian Areas

The CER identifies the following course of action on page 34:

C-1. Adopt as guidelines the Jefferson Forest Plan Riparian Corridor and Forest-wide Channeled Ephemeral standards (consistent with the Federally Listed Fish and Mussel Conservation Plan) into the plan and have them applicable across the entire George Washington National Forest.

Comment: We concur, reluctantly. The direction for riparian areas developed by the Southern Appalachian Regional Riparian Team was superior to that that finally adopted in the Plans for several Southern Appalachian Forests, including the Jefferson. However, the value of moving forward by adopting direction for the GWNF that is consistent with the existing JNF direction outweighs the value of reopening the debate.

E. Management Indicator Species (other than TES):

The CER identifies option C-1 on page 48, which would modify the Forest Plan by:

a) Creating new SBA(s) to protect the newly found eastern tiger salamander populations. See SBA map elsewhere in this report.

b) Increasing the prescribed fire objective on the Forest to begin to restore the Yellow Pine Community Type.

Comment: We believe the Forest should also add a provision to create areas to protect and actively manage ash trees, based on new expansion of the ash borer and related disease.

Comment: We agree that new populations of eastern tiger salamanders should be included in a Special Biological Area. We suggest this area be identified with a number of 4D, consistent with the numbering for Special Biological Areas on the JNF.

Comment: We also urge that newly discovered populations of the Cow Knob salamander, as noted on page 43 of the CER, should be included in a the Special Area that has already been established for Cow Knob salamanders.

Comment: The restoration of the Yellow Pine Community Type should be an important desired condition for the new GW Plan, as it was for the 1993 GWNF Plan. However, we disagree strongly that the fire objective on the Forest should be increased. The managers of the GWNF did not use the allocation for prescribed burning under the existing 1993 Plan to regenerate Yellow Pine Community type, even though this was identified as an important goal. In the revised Plan, the regeneration of yellow pine types should be identified as the priority for prescribed fire, to be accomplished before prescribed fire for other goals is undertaken.

F. Threatened, Endangered, and Sensitive Species.

The CER recommends the following change on page 53:

C-1. Modify the Forest Plan by:

- a) Creating new SBA(s) to protect the shale barren rockcress. See SBA map.*
- b) Creating new SBA(s) to protect the Northeastern bulrush. See SBA map.*
- c) Make an administrative change by delineating the Primary and Secondary Cave Protection areas (as shown in the Forest's 1998 Indiana Bat Amendment) and correspondingly, adopt the Jefferson Forest Plan direction for these special areas.*

Comment: We agree. The areas should be identified on the GWNF map with numbers consistent with those used on the JNF.

G. Unique Natural Communities

The CER recommends the following change on pages 54-55:

C-1. Modify the Forest Plan by:

- a) Designating 83 SBAs and expanding the boundaries of 13 existing SBAs a for a total of 49,584 acres of new SBAs, with acknowledgement that some or most of these may be in already protected areas such as Wilderness, Mt. Pleasant National Scenic Area or other unique areas of the Forest such as the existing Cow Knob Salamander Conservation area.*
- b) Removing Big Levels, Laurel Run, Maple Flats, Shale Barren Complex, Skidmore, and Slabcamp/Bearwallow from further consideration as Research Natural Areas.*

Comment: We support delineation of Special Biological Areas on the Forest map. Mapping seems generally helpful in protecting the unique natural communities from activities in the surrounding area. It is generally helpful to map these areas, even when nested inside other areas with more restrictive management direction, such as wilderness areas.

Comment: Although not stated in the CER, it is our understanding that approximately 1/3 of the area recommended by Natural Heritage was rejected by the Forest Service. All areas recommended by Virginia Division of Natural Heritage for Special Biological Areas should be included.

Comment: Further discussion should occur with the public before the six areas listed in b) are removed from further consideration as Research Natural Areas. Special delineation of Ramsey Draft natural area should be made for intensified work and a sub-plan

developed to further integrate the efforts of the research arm of the USFS into the guidelines and into production of research results information of use to staff and the public.

Issue 2 Below Cost Timber Sales

According to the 1993 GW Plan:

A review of concerns that fall under the Below-Cost Timber Sale issue reflect its Complexity. Concerns expressed by the public include: (1) opposition to below-cost timber sales, (2) effects of timber harvesting on local communities and economies; (3) role of the Forest's timber program in the local timber market; (4) multiple-use benefits from timber harvesting, (5) failure of the Forest to provide a legitimate rationale for below-cost sales; (6) compliance with a Department of Agriculture decision on the analysis needed to support a Forest Plan with below-cost timber sales, (7) the amount of land that will be deemed suitable for timber management, and (8) timber harvest levels. (Plan, p. 1-4)

This, along with analyses of past and projected budgets and alternative funding scenarios, should be the framework for the analysis for this issue.

A. Efficiency of Timber Sale Program

On page 57 the CER asserts that this is no longer an issue:

Since TSPIRS was abandoned we have no longer specifically tracked the costs and benefits of the timber management program in a formal manner. Rather than funding a continued paper analysis of actual and estimated costs and benefits, we have focused on funding management activities that are conducted in a cost efficient manner to achieve the Forest's goals and objectives.

Comment: Just because the Forest Service wants to stop thinking about the Below Cost Timber Sale issue doesn't mean the issue goes away.

The assertion that the timber harvesting is a cost-efficient means of achieving the Forest's goals and objectives is unsupported in the CER. During the revision, this assertion needs analysis to see if it is true. If the Forest's goals and objectives are unique or separate from those of national and regional policy and can be stated in measurable terms, then means can be devised for expressing cost effectiveness and thus accountability. If high cost effectiveness can be described, even if different from national norms, and it can be achieved more efficiently through some other means, then we should use that means rather than continuing to rely on timber harvesting. Moreover, the management of areas for timber **production** should take place only if the revenues are greater than the costs. Production of other forest benefits (e.g., wildlife and its forage; songbird species needs) can be achieved through tree removals but the net cost of these removals should be noted as costs of achieving those benefits.

B. Rural Development

The CER recommends the following change on page 57:

Is a Change in the Plan warranted? No, yet we are just changing the focus.

Comment: The entire discussion in this section is garbled and needs to be rewritten so it makes clear whether or not a change should be made in the Forest Plan. A major change should be made to address the essential role of local people in providing services for the Forest users, providing essential workers within the forest for development and maintenance, and healthy vigorous communities for Forest staff. The issues to be addresses include:

1. Role of Forest quality and use in stabilizing rural private land values
2. Unauthorized off-road vehicle use of the land
3. Urban residential area expansion and fire risks
4. Minorities use rates
5. International emphasis, ecotourism, and vital user base
6. Employment and community stability
7. Inadequate ecological knowledge use
8. Growing energy challenges (wood use and air pollution)
9. Vertebrate damage and risks to towns-people;
10. Invasive species problems and boundary conditions
11. Political support for Eastern Forest management and programs
12. Admixture of Western Forest problems and policies with Eastern conditions
13. Unstable artesian and groundwater supplies
14. Excessive wilderness uses
15. Needs for River initiatives
16. Multi-agency conglomerates
17. Improving State-and-private linkages
18. Improving Research Station, university/college, and Forest linkages

C. Suitability (Review)

The CER recommends the following change on page 59:

C-1 Strive to maintain existing amount of forest generally suitable for timber production to between 350,000 to 370,000 acres.

Comment: Under the current (1993) Plan, only the suitable acres in the 91,000 acre MA 17 are managed specifically for timber production. Since the CER has recommended eliminating MA 17 and rolling it into a general forest area with no clear focus on timber management, the proposed Plan now has 0 acres generally suitable for timber **production**. The map showing areas generally suitable for timber production needs to be corrected to reflect this fact.

It may be more helpful to focus on the acreage available for timber harvest, on which timber harvest is a tool to achieve other multiple use goals, usually the creation of desired habitat for wildlife. However, if the Forest supervisor and staff believe that this significant increase to as many 370,000 acres should be managed for timber production, we would be interested in analysis in the planning process that shows why this is desirable or economically feasible given declining budgets. Asserting this objective before any analysis has been done strongly suggests the revision is driven by a political agenda rather than analytical planning.

The imbalances started from brief but intensive harvesting over such an area can have well-known major adverse ecological impacts in the region of the Forest.

D. Allowable Sale Quantity

The CER recommends the following change on page 61:

C-1. Modify the Forest Plan by:

- a) Creating a new volume objective.*
- b) Making administrative corrections in wording to eliminate all reference to the ASQ in the current Forest Plan by replacing discussions relating to ASQ in the current Forest Plan with similar discussion as it relates to LTSYC. LTSYC will be computed for this Forest Plan Revision as the revision process moves forward. We have no proposal for LTSYC at this time, although it is unlikely that it will increase over the current LTSY and may decrease as and if the amount of suitable timberland decreases.*

Comment: A calculation of LTSYC is required by the NFMA, but it is a wasteful, useless exercise for informing plan revision for the GWNF. It should be done in the quickest and least-costly method available to comply with the letter of the law. A volume objective for the GW has some utility for budgeting. However, the volume objective should be informed by a careful analysis of budget trends and national wood production. The long-term trend in volume output in terms of budget dollars (corrected for inflation) suggests that an achievable timber volume objective is substantially lower than the level of timber harvesting that has occurred on the GW over the last five years. It is critical that the desired condition for the GWNF lands be formulated to reflect this lower level of funding and a clear explanation of the intended exceptions presented.

E. Salvage

The CER recommends the following change on page 63:

C-1. Modify the Forest Plan by revising or adding guidelines similar to the following to appropriate forest or special area direction:

- o Special Biological Area (Old GW MA 4-58): Ground-based systems could be used for the salvage of dead, dying, or damaged trees along open road systems. For that part of the area not accessible by existing roads, salvage activities should only be accomplished by helicopter with no new road or landing construction.*
- o Scenic Corridor or Viewshed (Old GW MA 7-14): Salvage of dead, dying and damaged trees can occur to provide for scenic rehabilitation and public safety using ground based or helicopter logging.*
- o Remote Backcountry Area (Old GW MA 9-12): Salvage of dead, dying, or damaged trees can occur from perimeter roads using helicopter logging with no new permanent or temporary road or landing construction within the area. Salvage and firewood gathering from system interior roads can occur using ground based methods without additional road construction. Landings can be provided adjacent to existing roads.*

Comment: Salvage in ANY area, including Special Biological Areas, Scenic Corridors or Viewsheds, and Remote Backcountry Areas should take place only if it positively contributes to the Desired Condition for those specific areas. Guidelines pertaining to salvage in those areas should specifically link salvage to achieving those desired conditions. Helicopter logging seems unlikely when there is a declining local forest economy, when there are increasing energy and financial costs, and when there is increasing concern for global warming and low-risk water resource management.

Issue 3 Forest Access

A 1. Forest Roads in Wildlife Management Areas

On pages 66-67, the CER recommends option C-5 from the following list of possible changes:

- c. Tentative Options or Proposed Actions for Change (If the Revised Plan identifies distinct wildlife emphasis areas like MA 14 and MA 15)*
 - C-1. Adopt as George Washington Plan objectives the Jefferson Plan standard.*
 - C-2. Reallocate the eleven MA 14 polygons that exceed Plan standard 14-7 to Management Areas that have no open road density objectives. Reallocate the fifteen MA 15 polygons that exceed Plan standard 15-5 to Management Areas that have no open road density objectives.*
 - C-3. Remove the existing standards 14-7 and 15-5 and adopt as a guideline the language from the Revised Jefferson Plan that says “existing open public roads are maintained at current density levels to provide for public access and safety.”*

C-4. Reassign GW standards 14-7 and 15-5 as objectives in MA 14 and MA 15 and leave the road density figures alone.

C-5. Remove the existing standards 14-7 and 15-5 and create guideline that roads should be closed during nesting and brooding rearing seasons and then can be opened during fall hunting seasons. (See also Wildlife discussion at the end of this report.)

Comment: Road density and road management should remain part of the desired condition for areas specifically managed for bear, turkey, and grouse. This should be discussed further during the revision process. A decision regarding which option to adopt should *follow* this discussion and analysis, not *precede* them.

A 2. System Roads Across the Forest

The CER recommends the following change on pages 68-69:

C-1. Delete road construction as an objective of the Plan.

Comment: An important component of plan revision is to determine what road network is needed to achieve the desired condition of various parts of the Forest. After the needed road network has been determined, we will have a clearer sense whether or not to set road construction objectives and concomitant maintenance plans and budgets.

B. Licensed OHV Use

On page 69 the CER recommends that no changes be made in the Forest Plan regarding this topic. However, the CER also states:

As an administrative action, the list of OHV roads that appears in the Plan will be deleted as these roads will be shown in the future on the Forest's Travel Management map, which is slated for completion by the end of calendar year 2007.

Comment: The list should also occur in the Forest Plan and the routes shown on a map showing travel-ways generally suitable for Licensed OHV Use.

C. Non Motorized Trails

On page 71 the CER recommends that no changes be made in the Forest Plan regarding this topic. However, the CER also states on page 70 that the current plan:

...identifies approximately 300 miles of potential trail to be constructed and 92 miles reconstructed over the course of the planning period if funding allows.

Comment: The CER also notes that some trail construction and reconstruction projects have been completed. During the plan revision, an analysis and discussion should take place to describe the uncompleted projects that should be carried forward as objectives.

D. Access for Persons with Disabilities

The CER recommends the following change on page 73:

C-1 Modify the Forest Plan by:

a) Adding a guideline that references Forest Service policy (FSM 2330) on universal access

b) Making administrative corrections by adding legal references to ABA of 1968 and the Rehabilitation Act of 1973 and removing the ADA reference and outdated terminology such as the word "handicap" and all its variants.

Comment: We concur with these proposed changes.

Issue 4 All Terrain Vehicle Use

On page 74 the CER recommends that no changes be made in the Forest Plan regarding this topic. However, the CER reports on page 74:

The Rocky Run Area received significant flood damage in 1996 (Hurricane Fran) to the lower Rocky Run Trailhead and access trail. This access has been closed since that time and a decision has not been made on its reestablishment. The proposed system on the Deerfield District did not become established due primarily to the lack of sponsorship from any ATV organizations. The Taskers Gap/Peters Mill Run and South Pedlar Areas continue to function. Both areas require frequent maintenance which is typically beyond the capability of the forest trail maintenance funding level and has been done through special regional and national allocations and Virginia Recreation Trails Fund grants.

Comment: From the CER information, it seems to us that a review of the ATV direction is warranted during revision of the Forest Plan.

Issue 5 Roadless Area Management

A. Existing Inventoried Roadless Areas

The CER recommends option C-3 from the following list on page 78:

Under all following options we believe that the Priest (5276 roadless ac.),

Three Ridges (4,702 roadless ac.), and Mt. Pleasant (8,905 roadless ac.) should be dropped from the roadless inventory because these areas are now congressionally designated areas. Therefore there are now 21 allocated

C-1. Adopt the 2001 Roadless Rule as a guideline; yet leave the existing management area allocations as identified and delineated in the 1993 GW Forest Plan

C-2. a) Remove the three Special areas designations (Laurel Fork, Little River, and Big Schloss) and Prescription 12B – Remote Backcountry); b) assign the remaining 21 roadless . he three Special areas designations (Laurel Fork, Little River, and Big Schloss and assign them to existing GW Remote Highlands (Management Area 9 or Prescription 12B – Remote Backcountry); b) assign the remaining 21 roadless areas to existing GW Remote Highlands Area 9. c.) Add a guideline that the inventoried roadless areas be managed under the 2001 Roadless Conservation Rule or whatever rule is in effect.

C-3. Modify the Forest Plan by:

a) Identifying a special area (Remote Backcountry) that includes: a) the three special area designations (Laurel Fork, Little River, and Big Schloss); b) the existing GW Remote Highlands area (Management Area 9 or Jefferson Prescription 12B – Remote Backcountry); and c) the portions of the 21 inventoried roadless areas not currently in GW Remote Highlands area.

b) Adding a guideline for this special area that inventoried roadless areas will be managed under the current roadless policy and direction.

c) Adding a guideline that where conflicts occur between management of inventoried roadless areas and known locations of special botanical – zoological areas, the biological values will be addressed first.

C-4. Allocate roadless areas that allow road construction and timber harvesting to Management area direction that avoid new road construction and reconstruction and cutting, sale, and removal of timber as per the table discussed above. See table on following pages. The areas proposed for change are also highlighted on the linked map.

Comment: Create an option C-5 that creates a new special area (identified as 12 D) which has a desired condition and guidelines that embody the direction in the 2001 Roadless Rule. Assign all existing roadless areas (minus the areas designated by Congress) to this new special area.

As noted in the discussion in the CER, the 2001 Roadless Rule is currently the law of the land regarding management of inventoried roadless areas. As the CER also notes, the bulk of the inventoried areas on the GW are managed under direction that is not

significantly different from that in the 2001 Roadless Rule. It makes sense to make the management of inventoried roadless areas consistent with the 2001 Roadless Rule because no matter how the court cases are eventually decided, it avoids having to make amendments to the Plan in the future and it entails foregoing few administrative management options now.

B. New Potential Wilderness Area Inventory

Although the CEF does not explicitly recommend an option for changing the Forest Plan, it does state on page 84:

The Forest has begun looking for potential wilderness areas (in addition to the current roadless inventory). We are reviewing the Recreation Opportunity Spectrum inventory. If additional potential wilderness areas are found, we will propose them for further study.

Final agency guidance (Forest Service Handbook (FSH) 1909.12 Chapter 70) on identifying potential areas was just released on January 31, 2007. We should have areas preliminarily identified and posted to the World Wide Web before the scheduled March public meetings. Whether these preliminary areas should be added to the inventory would depend on our ensuing evaluation.

The agency wants to hear from people on what areas they wish us to consider for Congressional Wilderness designation and areas they wish us to consider as potential wilderness areas.

Comment: This discussion is confused and needs to be rewritten. The process for identifying areas to be included on an inventory of potential wilderness (formerly called a roadless area inventory) is specified in FSH 1909.12 chapter 70. The agency has the responsibility to conduct this inventory process, and while collaboration with the public in conducting this inventory is appropriate, the GW staff has the duty to review all areas of the Forest for potential wilderness areas, not just those recommended by the public. Moreover, areas that meet the inventory criteria are automatically placed on the inventory. The statement in the CER that they would be added to the inventory only depending on some ensuing evaluation is wrong. It is correct that areas that have been identified as potential wilderness should be evaluated according to criteria in the FS Handbook to see which of them should be recommended to Congress for legislative designation.

Contrary to the statement in the CER, the Forest has not posted a map showing the results of its potential wilderness inventory before the first round of March meetings. This should be done ASAP.

Issue 6 Special Management Areas

A. Wilderness

The CER recommends the following change on page 85:

C-1. Include Wildland Fire Use as a suitable use within wilderness and adopt as a guideline Jefferson standard #FW-140 that says: "FW-140: Lightning-caused fires may play their natural ecological role as long as they occur within prescribed weather and fuel conditions that do not pose unmitigated threats to life and/or private property, particularly to property within the wildland/urban interface zone."

Comment: Wildland Fire may be a "generally suitable use" within wilderness areas, but this is a determination to be made area-by-area in the planning process.

B. Wild and Scenic Rivers

The CER states on page 86 that no changes are needed.

Comment: Further review of this topic is needed before we can comment.

C. Important Scenic and Recreational Areas

The CER states on page 87 that no changes are needed.

Comment: Further review of this topic is needed before we can comment. The Appalachian Trail and new biodiversity survey interests need to be included and planned assistance and limitations stated.

Issue 7 Aesthetics

The CER recommends the following change on page 90:

C-2. Adopt as guidelines the Jefferson Revised Forest plan approach of using scenic classes and adopting scenic integrity objectives.

Comment: This inventory needs to be completed ASAP. SIOs are an important component of the Desired Condition statement for various areas of the Forest.

Issue 8 Vegetation Manipulation

The discussion in the CER for this issue misses the most important dimensions as outlined in the 1993 Plan:

Public comments over vegetation manipulation reflect concern over how timber and other vegetation is manipulated.

By far, the most controversial manipulation is clearcutting. Comments addressing the clearcutting controversy can be divided into four areas of public concern

- *Clearcutting should be eliminated or severely curtailed as a harvest method*
- *Clearcutting should be relied on as the primary harvest method or at least*

retained as one of the tools used to achieve management objectives.

- *Clearcutting must be shown - through site specific analysis - to be the optimum harvest method for achieving management objectives This analysis is a requirement of the National Forest Management Act (NFMA)*
- *Methods other than clearcutting, such as shelterwood, group selection and single-tree selection, should be relied on. (FEIS, p. 1-5)*

The issue does not go away just because it is not discussed in the CER. We recommend that each of these be addressed in a positive fashion along with silvicultural policies.

The CER recommends the following change on page 91:

*C-1. Add a new Desired Condition that states: "A blight-resistant American chestnut (*Castanea dentata*) returns to the Forest as a dominant species."*

Comment: A decision to make this a desired condition of the GWNF should take place only after test plantings are made and, if successful, a subsequent assessment of the costs involved in returning the chestnut as a dominant species to the Forest shows that feasible.

An ash tree initiative should be proposed

Issue 9 Resource Sustainability

A. Ecosystem Management

The CER states on page 92 that no change in the Forest Plan is needed.

Comment: We disagree strongly. See the discussion under Chapter Two (above) for our comments about role of the Southern Appalachian Assessment in "driving" some aspects of the "need for change" in the GW Plan revision. We recommend a statement be included in the CER of the local interpretation and consequences of following "ecosystem management" on the GWNF, and differences citizens might see from "multiple use" policies of the past.

B. Extirpated Animal Species

The CER states on page 92 that no change in the Forest Plan is needed.

Comment: We agree with the conclusion in the CER, based on the information provided.

C. Soil Productivity

The CER recommends the following change on page 94:

C-1. Modify the Forest Plan by deleting George Washington Plan standard #216 and adopting as a guideline Jefferson Forest Plan forestwide standard FW-5 that says: "On all soils dedicated to growing vegetation, the organic layers, topsoil and root mat should be left in place over at least 85% of the activity area and revegetation should be accomplished within 5 years."

Comment: The National Forest Management Act standards regarding soil productivity and revegetation should be cited and hyperlink established. Restoration initiatives for roadsides, mine scars, and borrow pits should be stated. A new GIS-base initiative for describing the soils of the Forest and relating them to potential tree production, erosion, runoff, riparian stability, groundwater recharge, and susceptibility to pollution should be stated.

D. Water Quality

The CER recommends the following change on page 100:

C-2. Designate the same locations above as reference watersheds; acknowledging they lie beneath other existing and compatible Plan management areas (as in the Jefferson Forest Plan).

Comment: These areas should be included in the Forest Plan and delineated on a Forest Plan map. A clear baseline should be established so that change in water quality throughout the forest and how it may be contributing to rural communities can be established.

F. Herbicides

The CER states on page 102 that no changes are needed in the Forest Plan.

Comment: We believe that the use of herbicides should be included in the Monitoring section. Include new EPA statements about herbicides in environments.

The planned relations between herbicides and invasive plant species should be noted.

G. Fire

The CER recommends the following change on page 105:

C-1. Modify the Forest Plan by:

a) Identifying that Wildland Fire Use is a generally suitable use everywhere on the George Washington National Forest, acknowledging that the safety of firefighters and general public and the protection of life and property are the highest priorities; and if a lightning fire breaks out, procedures in the Wildland Fire Use Implementation Procedures Reference Guide will be used.

b) Increasing the prescribed fire objective to an annual program of 10,000 to 15,000 acres on the GW.

c) Identifying a forestwide desired condition by adopting Jefferson Forest Plan goal #18 that says "Fire regimes are within their historical range as defined by condition class #1. Condition class is a function of the degree of departure from historical fire regimes resulting in alterations of key ecosystem components such as species composition, stand structure, successional stage, stand age, and canopy closure. Fire regimes in Fire Condition Class #1 are within historical ranges. Vegetation composition and structure are intact. The risk of losing key ecosystem components from the occurrence of wildland fire remains relatively low."

Comment: The prescribed fire objective should be determined only after agreement on the desired condition for specific areas (various areas) of the Forest, analysis of complying with the air quality constraints, and demonstrating the feasibility of funding various levels of a prescribed fire program.

Additions for integrating wildfire prevention and control with national security plans for fire containment should be made.

H. Air

The CER recommends the following change on page 107:

C-1. Modify the Forest Plan by:

a) Making administrative changes to some existing standards and eliminate those that are already addressed in laws, regulations, or policy.

b) Adopting as guidelines the following Jefferson Plan standards:

1. Adopt as guideline Jefferson Plan Standard FW-142 that states: "Best available smoke management practices should be used to minimize the unfavorable effects on public health, public safety and visibility in Class I areas (James River Face Wilderness and Shenandoah National Park) from prescribed fire. (FSM 5144 and Region 8 Supplement)"

2. Adopt as guideline Jefferson Plan Standard FW-143 that states: "Prescribed burning conditions indicate that smoke can be carried away from non-attainment areas with a forecasted Air Quality Index (AQI) of Code Orange or higher. Prescribed burning should not be conducted in any area that is forecasted with an AQI of Code Red or higher."

Comment: Smoke from some prescribed fires is already a health issue for people living close to the Forest and at some distance. Impacts on public health need to be addressed

for existing and any increased level of burning, whether from forest fires or from increased wood use for industrial or household energy.

Issue 10 Minerals and Energy

A. Federal Minerals

The CER states on page 110 that no changes are needed in the Forest Plan.

Comment: Given fossil fuel limitations and international changes, comments seem warranted about resisting new efforts for more extraction, opening areas, costs to citizens, and impairment of historical uses of the land. Potential activity on mineral extraction and its impacts on the Forest seem essential in a long-range plan such as this.

B. Groundwater and Karst

The CER recommends the following change on page 111:

C-1. Modify the Forest Plan by rewording GW forestwide standard #15 to a forestwide guideline that says "Significant and potentially significant caves on the Forest are managed in accordance with the Cave Resources Protection Act of 1988 (16 U.S.C. 4301-4309) to protect them through regulating their use, requiring permits for removal of their resources, and prohibiting destructive acts. Caves entrances are natural or naturally appearing".

Comment: This seems reasonable. Guidelines for building roads and active logging (pollution, soil disturbance, compaction, in karst topography are needed to complement a Forest groundwater plan. Protecting through education, signs, and enforcement, and then also removing waste and refuse from sinkholes (when discovered) is needed as part of this plan for enhanced water quality.

C. Private Mineral Rights on Public Lands

The CER recommends the following change on page 112:

C-1. Adopt as a one guideline Jefferson Standards FW-151 & FW-229 that says: "Where reserved or outstanding mineral rights are involved, the mineral owner should be encouraged to implement all surface-disturbing activities outside riparian areas."

Comment: We agree that all surface-disturbing activities should be implemented outside riparian areas. Where this is impossible, then superior stream crossing techniques need to be stated as required.

D. Geologic Hazards

The CER recommends the following change on pages 117-18:

C-1. Modify the Forest Plan by:

a) Modifying to a Desired Condition the intent of Revised Jefferson Forest Plan Goal 31 (page 2-53) that states "Manage geologic resources to provide multiple public benefits. Manage geologic hazards to protect public safety and facilities while integrating the keystone role of these natural disturbances in riparian and watershed management. Integrate geologic components (processes, structures, and materials) in management of riparian areas, watersheds and ecosystems."

b) Adopting as a Guideline the Revised Jefferson Forest Plan Forest-wide Standard FW-216 (p. 2-53) that states: "Trails, roads, other facilities, and activities should be located and designed to avoid, minimize, or mitigate potential geologic hazards."

Comment: Consistency with the JNF on this (and most issues) is desirable. A clear link to karst topography above is needed.

E. Wind Energy Development

The CER recommends the following change on page

C-1 Identify the Forest as generally suitable for locating wind energy development (commercial wind farms) outside of the following special areas: Wilderness or wilderness study areas; special botanical, zoological, geological, or research natural areas; Shenandoah Mountain Crest (Cow Knob Salamander Habitat); both Indiana Bat protection areas; Appalachian Trail corridor; remote backcountry areas; Mt. Pleasant National Recreation Area; and Big Schloss, Laurel Fork, and Little River Special Areas. Lands under this option are displayed on the attached maps for the half of the GW. The Forest is assuming that only Department of Energy wind power North half and South classes se areas. In addition,

1. If and when an application is received and, during site-specific analysis, consider designating as a special area the wind energy site.

2. For commercial scale requests, adopt as guidelines those guidelines developed by BLM, followed by any nationally Forest Service-developed guidelines. These will be incorporated into the planning process as they become available. Guidelines for development of wind energy on land generally suitable could be developed based upon the best information and science available on the effects of wind farms on key environmental resources such as avian threat views from certain roads and trails, and other environmental considerations such as noise.

Identify as generally suitable for locating wind energy development (commercial wind farms) the entire National Forest outside of Congressionally-designated areas. The Forest also recognizes that only Department of Energy wind power

classes 3 or greater would be generally commercially feasible in these areas. In addition the sub-options 1 and 2 would still pertain.

Do not address in the Revision effort acknowledging that agency enough about this subject as it pertains to eastern United States. Agency would address through site-specific analysis as proposals are received.

Comment: While we recognize the likely salience of this issue for management of the GWNF over the next 15 years, this topic needs further analysis and discussion before a recommended course of action can be agreed to. A key area of potential conflict that needs specific comment is the already experienced death of significant numbers of bats and migratory birds at wind energy collecting devices.

We believe there is an additional issue that should be addressed in the CER:

With reduced fossil fuel supplies and availability, how will the GW respond to a national request for participation in a biofuel supply buildup as part of a national energy supply initiative.

Issue 11 Forest Pests and Invasive Species

A. Population Control

The CER states on page 121 that there is no need to change the Forest Plan.

Comment: In light of the developing threat to the GW from a variety of forest pests and invasive species and the emphasis placed by the Chief on dealing with forest pests and invasive species, we would have expected a call for much more robust discussion regarding changes in the Forest Plan. We think more analysis and discussion should take place during the revision regarding this topic.

The topic have always included disease vectors but now must address increased incidence of insect-borne disease for people living at the edge of the Forest, and also persistent problems with large carnivores, with deer effects on forests and rural-urban landscapes, auto strikes, bird roosts and others. Revised policy discussions (planned) with evolving state and federal wildlife agencies about “wildlife” or “wildlife habitat” controls and to whom does the wildlife responsibility belong seem needed.

B. Intervention Treatments

The CER recommends the following change on page 122:

C-2. Modify the Forest Plan by:

a) Making an administrative change to the heading of this issue to read “Forest Pests” and globally, throughout the Plan, substitute “forest pests” for “gypsy moth.”

b) Establishing a Forestwide Desired Condition that states: “A forest environment is provided where damage to natural resources from forest pests (any non-native invasive species including plants, animals, insects, and/or diseases) are minimized when such damage prevents the attainment of other natural resource objectives

Comment: See comment under 11A. above.

C. Silvicultural Practices

The CER recommends the following change on page

C-2. Make administrative corrections by broadening titles and appropriated guidelines that refer only to gypsy moth to refer to pests and diseases.

Comment: See comment under 11A. above.

Issue 12 Adequacy of the Revision

The CER states on page 124 that topic does not need to be addressed.

Comment: While the adequacy of the 1993 revision may be moot, the adequacy of this revision certainly is an issue that needs to be address. While we recognize that the initial draft is merely that—an initial draft—it is not adequate for staff guidance, for public comment, for general accountability, or for a clear view of what we and others of the public can expect from the Forest in the near or distant future.

Issue 13 Mix of Goods and Services

A. Developed Recreation

The CER recommends the following change on page 127:

C-2. Make an administrative change by removing the listings to individual developed recreation facilities and discussing that the developed recreation program in expansion and/or new construction of facilities will be dealt with by site specific analysis and completed only to the extent that funding and staffing levels allow.

Comment: We think the current Plan addresses the management of developed recreation better than the proposed option. There is utility is specifying the areas in the Forest Plan and developing an overview of needed expansion (or contraction) of facilities. Other

Forests have closed recreation areas. This is a local concern and need to be addressed specifically. That is part of the strategic nature of planning.

B. Dispersed Recreation

The CER three options for change on page 130 but does not select one as the preferred option.

C-1 No change. Continue to use the existing GW Plan adopted ROS classes by applying them to identified areas of the Forest.

C-2. Remove the SPM 1, SPM2, and Roaded Modified designations from the GW Plan, thereby collapse the GW ROS classes into the basic inventory classes; and provide suitable uses and associated guidelines on road construction and management by SPM and SPNM classes in the Plan.

C-3. Complete a new inventory of ROS on the GW and adopt the inventory in place of the 1993 adopted ROS classes. Incorporate into plan direction a desire that the acres of SPNM and SPM will be maintained (where it is within our management control). This could be done with a guideline on road construction or using the SP2 Class concept from the Jefferson Plan. The SP2 Class concept creates a buffer area around SPNM and SPM areas where permanent road construction is limited to protect against loss of SPNM and SPM areas.

Comment: A new ROS inventory needs to be completed ASAP. Option C-3 offers the most consistency with the JNF (and other Southern Appalachian Forests), which should be a prime consideration in revising the GW Plan.

C. Wildlife

The CER selects option C-2 as the preferred option for change on page 134:

C-1. Modify the Forest Plan, as appropriate by:

d) Adopting Jefferson Revised Plan Goals 1, 2, 6, 8, 12, 13, 14, 15, and 18.

e) Adopting and modifying Jefferson Revised Plan Objectives 8.01, 12.02, 12.03, 12.04, 12.05, 13.01, 18, 01, 18.02, and 18.03.

f) Adopting as guidelines Jefferson Revised Plan Forestwide standards FW- 32, FW-33, and FW-77.

g) Adopting as desired conditions, objectives, and guidelines the Jefferson Revised Plan Management Prescriptions 8A1, 8B, 8C, 8E1, 8E6, and 10B.

h) Increasing the prescribed burn objective.

i) Adding an objective for open woodland restoration, specifically for wildlife purposes.

j) Adding an objective for blight resistant American chestnut restoration.

C-2. Merge GW Management Areas 14, 15, 16, 17, and 22 (Jefferson Prescriptions 8A1, 8B, 8C, 8E1, 8E6, and 10B) into one area and modify the Plan under C-1 options above, as appropriate given the merging.

Comment: It is vitally important that the revised GW Plan retain areas delineated for management of select, very important, typically game wildlife species. These areas should be numbered to be consistent with the JNF numbering system. The size and location of these special areas for wildlife management should be informed the location of wildlife management areas in the current GW Plan, but it may be necessary to revise the boundaries. Specifically, the areas currently labeled MA 15 should be reduced in size so the habitat objectives can be fully achieved, especially in light of the levels of funding likely to be available. We firmly believe that it is bad wildlife management to disperse management activity over a large area when the financial resources are adequate to only meet half of key habitat objectives; it is much better wildlife management to fully meet the objectives in a smaller area. Clear analyses of likely demand are needed. I may be that as hunters decrease in numbers, the population and habitat needs are already or soon will be met by existing and successional changes.

There is a strong need to stop generalizing “wildlife” and to develop species-specific strategies not only for the major game species but for most of the other fauna. Many of the practices can and do overlap for some species. Many do not. It is costly and mismanagement of resources to fail to set precise objectives for each major species or species groups with similar needs, (including numbers and locations), attend to the dynamics of the habitat for each species (succession and transition or yield-like curves), and measure the returns to people in units of quality-weighted recreation hours, game harvested, and other gains such as increased income to stores, motels, etc. Equally important, continuing “net” analyses, the costs and losses and risks from animals to people needs to be included.

D. Land Ownership

The CER recommends the following change on page 136:

C-1. Modify the Forest Plan by:

a) Making administrative correction by removing all reference to Land and Water Conservation Fund (LWCF) as the funding source for land acquisition since no funding is available for land acquisition.

b) Deleting land program objectives for an exchange and acquisition program

and replacing with language that states exchanges and acquisitions of land will be accomplished as funding is available.

Comment: As was done in the JNF (and other SA Forests) Plan revision, the parcels identified as available for trade should be delineated and identified with a number 0. The management of these areas should be custodial.

E. Special Uses

The CER states on page 137 that no changes are needed in the Forest Plan.

Comment: This seems reasonable based on the discussion in the CER.

F. Grazing

The CER recommends option C-2 on pages 138-39 as needing change in the Forest Plan:

C-1. Remove pastoral settings and cattle grazing as a desired condition and replace the desired condition to be one of a bottomland hardwood forest along the South Fork of the Shenandoah River.

C-2. Change the desired condition to include having bottomland hardwood forest as well as pastoral setting (managed through grazing, burning, mowing, or hay fields), and bring any grazing program in line with the Jefferson Plan and Natural Resource Conservation Service (NRCS) practices by:

a) Adopting as desired conditions and objectives Jefferson Plan Goal 28 and Objectives 28.01.

b) Adopting as a guideline Jefferson Plan Forestwide range standard FW-212.

c) Adopting Jefferson Plan Management Prescription 7G (Pastoral Landscapes) desired condition statements as they pertain to pastoral settings and grazing.

d) Adopting as guidelines Jefferson riparian standards 11-38 through 11-40.

e) Creating an objective that the existing four grazing allotment plans be revised over the next 10 years.

C-3. Do nothing. Leave pastoral settings and grazing as is in the Plan.

Comment: The cost of administering the grazing program is greater than the benefits. The Plan should call for phasing out the allotments and allowing the land to revert to bottomland hardwood forest. Special provisions should be included for grazing animal use in understory development, fuel removal or modification, and select recreational

resource enhancement. Grazing under bidded concessions should be allowed for select areas.

Thank you for the opportunity to comment on the Comprehensive Evaluation Report. The announced time frame for completion of the CER is April/May. We urge that your team begin work on the next iteration of this important document as soon as possible so the public can collaborate in its completion. Please contact us if you have any questions about our comments or we can provide additional information to elaborate on the points above.

Sincerely,

Robert H. Giles, Jr.

James E. Loesel

Cc: Chuck Myers, Regional Forester

Rec'd 4/12/07

George Washington Plan Revision
George Washington and Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019-3050

Comments by J. J. Murray
Virginia Wilderness Committee



Conduct of the Hearings:

1. The power-point presentation was very well done. It provided the rather heterogeneous audiences with a common starting point and gave a clear picture of how the planning process was to continue. It is hardly the fault of the local Forest Service leadership that the planning process has been overtaken by events.

2. The leadership of the small groups varied enormously. In the best-run groups there was skillful drawing out of the various points of view and rapid, accurate recording of opinions. In some groups, however, the facilitator almost lost control, and it was difficult to make sure that one's views were accurately represented. If unskilled people are to be used in such roles in the future, it would be a good idea to invest in some advanced training from a professional facilitator.

3. I believe that the attempt to keep the facilitators from interacting with participants was a mistake. The reluctance of the facilitators even to answer questions on matters of fact made it hard for the participants to counter the misinformation that was widespread in many groups.

4. In view of the impact of the recent court decision on the planning process, it is to be hoped that the Forest Service will keep all interested parties informed in a timely manner about changes to the process and to the schedule of hearings.

Issues:

1. General: In the VWC Position Paper presented at the hearings, we outlined our interests in Special Management Areas, old growth, logging, roads, roadless areas, and wilderness. That document contains a list of areas that are suitable for consideration as Wilderness Study Areas and National Scenic Study Areas. At this stage of planning I should like to expand on only one aspect of these proposals.

2. Shenandoah Mountain: The block of land lying along Shenandoah Mountain between US 33 and US 250 represents one of the largest virtually continuous National Forest holdings in Virginia. It also has many special areas already designated within it, the Ramsey Draft Wilderness, the Little River Special Management Area, and areas where protection of the Cow Knob Salamander is a major consideration. We propose that this entire area be considered for special treatment focusing on conservation and recreation. It should be studied for multiple recreational uses to accommodate a number

of user groups such as hunters, fishermen, hikers, campers, mountain bikers, bird watchers, horseback riders, etc. We believe that this recreational program would be compatible with a conservation agenda with a focus on rare species such as the Cow Knob Salamander. Wilderness should be an integral part of the mix. We would particularly suggest the evaluation of Little River, Skidmore Fork, and a Ramsey Draft Addition for designation as Wilderness Study Areas. We look forward to a full discussion of this proposal during the session (presumably to be rescheduled) to be held on wilderness this summer.

New Forest Plan

I appreciate the opportunity to provide input for the George Washington Forest Plan Revision. I attended the meeting in Lexington this past month and gave some input then but I would like to expand on my comments.

The primary idea I presented was to provide more hunter access in the way of 4WD roads than is currently in place. I have been hunting and fishing in the GWNF for more than 40 years and during that time I have seen a constant reduction in the number of hunter access roads every year. In 2005 I gathered information to present to my congressman, Bob Goodlatte, addressing my concerns over the road situation. I had previously contacted the Virginia Department of Game and Inland Fisheries and found that in 2004, there were 125,000 National Forest Stamps sold in Virginia. As I'm sure you know, this stamp is required for a person to hunt or fish in the National Forest. I also provided him a topographic map of part of what used to be the Pedlar Ranger District near Snowden, VA where I had highlighted roads that I have personally driven on in the past that are now closed as well as the one road that is currently open. I gave District Ranger Annie Downing a copy of this same map at the meeting in Lexington. These roads were actually 4 wheel drive trails that were low maintenance, non-graveled trails, many of them one-way, that we used for hunting access. The Forest Service provided very little maintenance as we kept these roads passable ourselves using picks, shovels, and chain saws.

It is some of these roads that I would like to see re-opened. It is not so much to provide a way to get to a hunting area as it is to provide a way to retrieve the game that is harvested. Unless you have had to remove a large deer or bear you don't know what is involved. It is a very strenuous feat and to move one even a little way uphill takes a great deal of strength.

I have been told that the reason these roads have been closed is the high cost of maintenance. Even though hunters and fishermen are the only group of Forest Users I know that have to purchase the National Forest Stamp for undeveloped facilities, if money were the problem, then establish a road use permit that everyone, including trail bikers and joy-riders, driving on these roads would have to purchase. When I was preparing my report for Mr. Goodlatte, I circulated a petition over a two week period during the firearms hunting season, stating that the undersigned were not satisfied with the hunter access to the National Forest. Although the number of signatures is not very large, these were only the people I saw while hunting in a relatively small part of the Forest and 100% of them did sign the petition. I have attached those signed petitions in a pdf file.

I think the key to establishing these trails and keeping the maintenance low is to make them one-way. The majority of the damage I have seen comes from people joy-riding and mud bogging. It is my experience that these people do not like to go on one-way roads because it makes them feel trapped and they are afraid of being caught.

We, the undersigned, do not believe that the U.S. Forest Service is providing adequate vehicle access to the National Forest and request that they open many of the old trails they have closed in the past 20 years.

NAME (Please Print)	Hometown	Phone (optional)	Email (optional)
Eddie Crouse	Lynchburg	434-889-8990	
Robert Timberlake	Lynchburg	434-386-3131	
Cody McCulloch	Evingson	434-525-5981	
RICHARD TWEEDY	MADISON Heights	434-929-4612	
DAN F. McCullach	COLEMAN FALLS	434-299-5370	
E.D. Hensley	Big Island	299-6112	
Roger Hoff	Roanoke Va.	540-890-5220	
Wesley Goff	Goodview, VA	540-297-4445	
Roger F. Robinson Jr.	Lynchburg	434-239-4017	
Heather Thurman	Lynchburg	434-529-1671	
Fred Frank	Mad Hants		
Jesper Johnson	Mad Hants		
Stacy Trice	" "		
Jim Cooper	LYNCHBURG	434-826-1120	
Robert Orr	Lynchburg	434-821-7430	
Kevin Payne	Lynchburg	237-1671	
David White	Lynchburg	385-8077	
Charles Beard	Bedford Va	434-832-7651	
John Price	Bedford VA	434-384-7310	NYQWF
Jeffrey Leonard	Lynchburg		
Mike Shannon	Lynchburg	434-239-7217	
Jimmy W. Shannon	Forest	434-525-9576	
Ruth D. Shannon	Lynchburg	434-239-7217	
William M. Sandidge	Lynchburg	434-385-8188	
C. J. Simmons	Mad Hants	434-5570	
Graeme McInda	Hampton	(757)224-6212	
Hunter Sandidge	Lynchburg	385-8188	
Scott Wood	Lynchburg	237-7801	
MARK CHAOS	Lynch.	239-1645	
STEPHEN CHAOS	SALEM	375-0734	
TONY CHAOS	RAPHINE	377-5707	
HAROLD GARRETT	ORLANDO FLA	(407)699-0472	
Ray L. GARRETT	CELA S'g old VA	258-2795	
WILLIAM A DAVIS	SALEM VA	387-2330	
BARRY LUNDGREN	Amherst, Va	528-3420	
Coll Lundgren	Amherst VA	528-3420	
Chris Barber	Forest, VA	434-525-9007	
Kevin Tolley	Amherst, VA	434-845-8372	
Alan Hammer	Campbell	434-223-5765	
Charles Tolley	Madison Hts, VA	(434)846-6921	

We, the undersigned, do not believe that the U.S. Forest Service is providing adequate vehicle access to the National Forest and request that they open many of the old trails they have closed in the past 20 years.

	NAME (Please Print)	Hometown	Phone (optional)	Email (optional)
1	Melinda Goodwin	Lynchburg	401-3853	
2	Person Jarvis	Beech	484-3417	
3	Rennie Flood	Lynchburg		
4	Misty Flood	Lynchburg		
5	Bryan Cressy	Lynchburg	239-2451	
6	Lisa Cressy	Lynchburg	239-2451	
7	Danny Williams	Pamplin		
8	Brendan McCawick	Appomattox		
9	Mike Cheatham	Greystone	665-7974	
10	Alan Wilbur	Lynchburg	434-401-4734	
11	David Brown	Lynchburg	434-316-8684	
12	Robert Osborne	Lynchburg	434-426-1750	
13	Arnie Hall	Hunt	434-944-3915	
14	ROBERT MASLOW	LYNCHBURG	434-237-4094	
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We, the undersigned, do not believe that the U.S. Forest Service is providing adequate vehicle access to the National Forest and request that they open many of the old trails they have closed in the past 20 years.

	NAME (Please Print)	Hometown	Phone (optional)	Email (optional)
1	MARK CARR	LYNCHBURG	832-4920	N/A
2	Marty Mathox	Lynchburg	832-4921	N/A
3	Gary Meadows	Chester Va	832-4921	N/A
4	Vinny Barile	LYNCHBURG, VA	832-3470	N/A
5	Robert Williams	Forest VA	385.8803	N/A
6	Bobby Wood	Madison Hgts	832-3085	N/A
7	STANLEY ZAMBER	FOREST VA	832 3037	N/A
8	RAY PERKINS	APPOMATTOX, VA.	832-3740	N/A
9	David Billiland	Goode, Va	(540)587-0174	N/A
10	J W TOMS	LYNCHBURG VA		
11	Shawn Onuffer	Lynchburg VA		
12	Tison Wade	Lynchburg, VA.		N/A
13	Jim Van Remortel	Evington, VA	832-3731	N/A
14	Tim Bennett	Rustburg, VA	832-3439	N/A
15	Tony Wood	Evington, VA	832-4162	N/A
16	Michael R. Corck	Lynchburg, Va.	400-1032	N/A
17	Deann L. Howell	Lynchburg, Va.	401-1444	
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Hardy County Historical Society

P O Box 4
Moorefield WV 26836

March 30, 2007

Jim Smalls, District Ranger-Lee District
George Washington Plan Revision
George Washington & Jefferson National Forests
5162 Valley-Pointe Parkway
Roanoke, VA. 24019

Dear Ranger Smalls;

The Board of the Hardy County (West Virginia) Historical Society requests that the preservation of the Capon Furnace and its site be given a priority in the new Forest Plan presently being developed. The goal is to provide for enhanced understanding of the historical significance of the iron industry in early 19th century Virginia now West Virginia and to add to the sites that would be of interest to the tourist traveling through and staying in Hardy County.

The furnace and property is owned by the National Forest Service and is in need of repair and clean-up. The furnace was built circa 1832 by James Sterrett who also owned Columbia Furnace and Powell Fort Furnace in Shenandoah County. The Capon Furnace is still standing although the stone work is beginning to fall and trees and vines are growing over and in the furnace. Some years ago, the Lee District placed signs at various points on the property to give visitors a "self-guided" tour and an explanation of what activity occurred at a particular place. These signs were vandalized and then removed. The vandalization was indeed unfortunate, but we are asking that the signs be replaced.

One of the members of the Society is doing extensive research on the history of the iron industry in Hardy County. The intent is to have the material published within the next two years. We would be happy to meet with you to discuss this project and how the Historical Society can work with the District to make the Capon Furnace historical site better known and accessible to visitors to Hardy County, West Virginia and the National Forest.

Sincerely yours,



Phoebe Fisher Heishman
President



March 27, 2007

Ken Landgraf
George Washington and Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019
klandgraf@fs.fed.us

BY EMAIL AND U.S. MAIL

Re: Public Meetings on George Washington National Forest Plan Revision

Dear Mr. Landgraf:

Thank you for a good discussion yesterday about the format and topics for the upcoming public meetings regarding the revision of the George Washington National Forest (GW) management plan. We appreciate the efforts of you and all the GW staff to conduct the first round of meetings earlier this month, and were glad to see the strong turn-out for those meetings. We hope this active public participation continues, and think that holding a meeting in Staunton, as you mentioned, will help.

Format of Public Meetings

As we discussed yesterday, we have a number of suggestions regarding the format of future public meetings. We believe these steps are essential to the “collaborative” process currently required by the NFMA planning regulations, 36 C.F.R. § 219.9.¹ So far, these meetings are missing several of the hallmarks of a truly collaborative process. There are several useful collaboration manuals which could guide this process, for example, the University of Virginia’s Institute for Environmental Negotiation’s collaboration guide (see below).

- Clearly Define the Goals – The ultimate goals for the public process and for each meeting should be clearly stated at the outset of each meeting. For example, the purpose of “collaboration” is to work to meet the goals of all diverse group members. See UVA’s Institute for Env’tl. Negotiation, Collaboration: A Guide For Environmental Advocates, at 5 (June 2001), available at <http://www.virginia.edu/ien/publications.htm>. Is this the Forest Service’s goal for the outcome of these public meetings?

¹ While we disagree with many aspects of the revised NFMA planning regulations, including the lack of an EIS under NEPA, the Forest Service currently is operating under them. We submit these suggestions so that the current process may be as constructive as possible.

- Smaller Groups – Based on our experiences in the last meetings, the “breakout” groups should be limited to 10-12 participants, to ensure everyone has the opportunity to state their interests and concerns. To further the Forest Service’s stated goal of participants talking with one another, the meeting format should provide for and encourage meaningful discussion among participants. Groups larger than 10-12 people ran out of time for discussion, and were limited to a “round-robin” opportunity to state concerns in the abbreviated “bumper-stickers” requested by Forest Service staff. These issues are too complex for a “bumper-sticker” approach. Each small group discussion should include a task or a series of questions for the group to address, in order to spark meaningful discussion. It is also important to allot ample time for each session, so discussions can develop. An hour to an hour and a half would be an appropriate starting point for the next round of meetings, then participants can assess the time needed for future sessions.
- Forest Service Should Participate – This would bring a significant stakeholder, and the decision-maker, to the table and allow agency expertise to inform the discussion. Participation in the “issue” meetings by appropriate resource specialists will be essential.
- Professional, Independent Facilitation – Each breakout group should be facilitated by a trained, professional facilitator who is independent from the participants. This is essential to the success of any collaborative process. A trained facilitator would be better able to move the discussion and to record accurate yet concise comments. At the previous meetings, comments frequently were recorded inaccurately or their meaning was lost once shortened to “bumper-stickers.” Finally, because the identity of the commenter is relevant, comments should be attributed to the person and/or organization.

Issue Meetings

We understand that you plan to have a public meeting on Wilderness Area recommendations and another meeting on Roadless Area management. We strongly encourage you to stick to this plan. We also understand that you plan to have meetings on vegetation management (including timber and fire), and on access issues (roads and trails). We look forward to participating in these meetings as well.

We believe that the following topics also are of great importance and that a meeting should be dedicated to each of these topics:

- Old Growth
- Recreation

- Forest Restoration – How will the forest plan contribute to the restoration of resilient, fully-functioning natural systems on the GW, including restoration forestry and restoration of soil and water?
- Invasive Species
- Special Biological Areas – Ensuring that all rare habitats and species are included.
- Watershed management
- Project-level Collaboration and Analysis – A stated goal of the planning process is to build constituencies around areas and issues, to encourage public participation to follow through to the project level where environmental analysis will be conducted. How will the forest plan provide for and contribute to collaboration at the project level and to needed analysis at a broad scale (landscape or watershed level)?
- The next round of public meetings on the need for change may well lead to the identification of additional issues that warrant dedicated meetings. For example, management of aquatic species, wildlife and native plants may need a meeting.

It is important to give notice of public meetings and plan revision interdisciplinary team (IDT) meetings well in advance. The Forest Service should publish now a tentative schedule for public and IDT meetings through the summer, with flexibility to add meetings if needed. Similar schedules were made available in advance during the recent revision of the Jefferson and four other forest plans.

Given the importance of making each public meeting productive, to capitalize on limited time, we urge the IDT to address these suggestions as soon as possible, so that there is time to make arrangements to improve the structure of the next round of meetings. We hope you can add a discussion of the format and issues for the public meetings to the agenda for the next IDT meeting this Thursday, March 29.

Several of us plan to attend the IDT meeting on Thursday. We look forward to discussing these issues further with you and the plan revision team. Thank you for your consideration. Please give me a call if you have any questions.

Sincerely,



Sarah A. Francisco, Staff Attorney
Southern Environmental Law Center

Sherman Bamford, Public Lands Coordinator
Virginia ForestWatch
National Forests Chair, VA Chapter of the Sierra Club

J. James Murray, President
Carol Lena Miller, Organizer
Virginia Wilderness Committee

David Hannah, Conservation Director
Wild Virginia

Ernie Reed, Council Chair
Heartwood

Hugh Irwin, Conservation Planner
Southern Appalachian Forest Coalition

Mary C. Krueger, Forest Policy Analyst
The Wilderness Society

Tammy L. Belinsky, Senior Staff Attorney
WildLaw

(signatures and contact information available upon request)

cc: Maureen Hyzer, Forest Supervisor
Dave Plunkett, GW Plan Revision IDT Leader



SIERRA
CLUB
FOUNDED 1892

Virginia Chapter

George Washington Plan Revision

George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke VA 24019-3050

comments-southern-georgewashington-jefferson@fs.fed.us

Dear Supervisor Hyzer:

Thank you for the opportunity to comment on the Revision Plans for the GW&J National Forests.

Governor Kaine has petitioned for increased environmental protection of more than 380K acres of undeveloped roadless land in the GWJ. He says, "These roadless areas will continue to provide vibrant wildlife habitat, outstanding recreation opportunities, and clean drinking water for Virginians, now and into the future. I look forward to working with the Forest Service to develop rules that will achieve the strongest, long-term protection of the maximum amount of undeveloped acreage in our national forests." We must work together to draft a rule for conserving roadless areas. Your pdf maps show an unacceptable area that you permit roaded. We must not allow the devastation in and near our inventoried and uninventoried roadless areas to be opened to degradation of our headwater streams and the loss of the biodiversity of our habitat and flora and fauna. Additionally, these areas must not be opened for off road vehicles.

The Worldwatch Institute Vital Signs 2007 says "that beyond their commercial value, forests provide myriad ecological services, including habitat for diverse species, erosion control, and regulation of the hydrological cycle. They are an important sponge for atmospheric carbon and therefore vital in the effort to stabilize the climate. As forested area contracted between 1990 and 2005, the carbon storage capacity of the world's forests declined by more than 5 percent." The Worldwatch Institute indicates global forest area contracted by 65 million hectares, a continuation of decades-long trend of forest loss in much of the world--offset by plantation forests and regrowth. These plantation pines, cherry and other single-type do not provide the proper undergrowth, insects and birds to sustain a good balance for nature.

The Sierra Club is a proponent of "Ending Commercial Logging" in our National Forest and public lands. Ninety-five percent of the nation's native forests have been logged. Most of the remaining five percent lie on public lands, but are subject to taxpayer subsidized logging. This practice must end on public land. As we look at the economic values, the private landowner who holds timber rights on private lands should be ensured his return on investment, not see the timbering interests with subsidized purchases and forest service roadbuilding and restoration undercut the private mills. In the Southeast, subsidies make it difficult for private landowners to compete in the high-quality mature sawtimber market. As a result, chip mills, which produce material for wood pulp from trees of any age and are fed almost exclusively by private lands have proliferated. We have also noted large land sales of timber for speculation.

Virginia does not have a Timber Severance Tax like West Virginia does (\$2.97M collected in 2002), so sales of timberland for speculation is more inviting. If the National Forests no longer sold timber, the restricted supply would increase the value of sawtimber. Private landholders would then have the economic incentives to use selection management on long rotations to produce solid wood products

instead of turning over the land for development or for 3d party investment. Virginia Forest Export News suggests that local forest product companies need to consider the opportunities of engaging in the wine cooperage business utilizing growth of white oak, with 20% of the forest inventory in Virginia.

Subsidized timbering of our Natural Heritage Forests for exportation has contributed to loss of livelihood of forest products such as Bassett, Rowe, and Lane Furniture have been closed due to cheap imports. Lumber veneer and log exports are the most significant wood product categories being shipped overseas. Virginia Forest Export News reports that 2006 is on pace to set records for Virginia wood exports. At \$134 million, the value of primary and secondary wood exports for the six months of 2006 were the highest export total ever tallied. Of wood exports in 2005, VA based companies were \$218.6M with the highest importers from Norfolk, Virginia District ports to China at \$82.8M, Italy at \$68.8, Spain at \$79.4. Logging of Virginia hardwood and old growth public lands should not be a part of this equation. They report that the Far Eastern Market Report indicates that by 2031 China will have used up the world's total forestry resources. While China strives to replenish it's depleted forests, they are beset by drought.

Our Chapter has sponsored hiking trips for our members to the Hoover Sale "Tour de Cut" and have been appalled by the lack of concern for old growth mesophytic forests and loss of our hardwoods, logging roads over our headwater streams, siltation and loss of our prime recreation fishing. The rights to log Hoover Creek were sold to Jayfor Logging Company for an average of about two thousand dollars an acre with an average of 450 board feet of lumber per tree. The sale was misrepresented by the FS as dry-mesic oak forest--whereas, scientists documented a diversity of species not typical of this type. The NEPA process used and the EIS were flawed. This process must not be streamlined and fast-tracked by the FS. Forest Service sales must continue to be an open process with input from many public sources.

Recreational Bass and Trout streams have been polluted in the Shenandoah Valley. We must have protections. We have reviewed the FS pdf on areas Suitable for Utility, Energy Corridor and Wind Energy and find this unacceptable on public lands.. We are in total opposition to the Healthy Forest Initiative, wherein top quality mature hardwoods are sacrificed to allow the loggers to make profit of the smaller, but not as profitable understory trees. In our hikes, our members have witnessed the fire-promoting slash that is left in the wake of the logging operations. We totally oppose this method of fire prevention. HFI must be applied to at risk forest communities, more suitable for Western states wherein the forests are not moist and diverse as in the Eastern States. Sales of public land within or near our noninventoried and inventoried roadless areas is totally unacceptable since it promotes at risk communities. Curtail these sales.

The Sierra Club has co-sponsored the attached publication Forests for the Future: A Citizen's Vision for the George Washington National Forest. We recommend a "good faith" voluntary moratorium on all logging and roadbuilding (except when needed for human safety and rare, threatened or endangered species) in areas identified in "Virginia's Mountain Treasures," existing old growth, and areas recommended by the Virginia Division of Natural Heritage for designation as Special Biological Areas for the duration of the GW plan revision process. Below are the talking points of this vision. The Sierra Club would like to be considered for any further public dialog as the Revision Plan progresses. Please keep us informed at the address sited below.

Sincerely,



Diana C. Parker, Virginia Delegate
Southern Appalachian Highlands Ecoregion
Virginia Chapter Sierra Club
10700 Chalkley Road, Richmond VA 23237-4048

27 March 2007

804-748-7842

erthshr@comcast.net

Attachments: Forests for the Future A Citizen' Vision for the George Washington National Forest Hoover Creek Sale in George Washington: Sierrans gather for the "Tour de Cut" in George Washington National Forest's mesophytic old growth.

Please include the following points as the Vision of the Virginia Chapter for the public record:

make restoration and sound, ethical management a budgetary priority;

manage our GWNF, which are public lands, for values and resources that are not ordinarily available or protected on private lands;

identify all lightly roaded or mostly intact mature forest areas, old growth, uncommon forest types, special ecological areas and conditions, rare species locations, intact watersheds, drinking water sources, and trail sites, and strictly protect them all from logging, road construction, drilling, mining, grazing, and other development;

manage for early successional habitat on public forest lands in a way that does not jeopardize the integrity of large, intact, older forest areas;

protect existing mature and old-growth forests from logging and other harm;

use natural disturbance regimes as models in managing forests for biological diversity and permit natural disturbance events where possible;

cut back on intentional burns and allow lightning ignitions to burn in a contained manner;

connect and enlarge mature forest patches wherever possible through road decommissioning and other restoration efforts;

protect all 65 identified Virginia Mountain Treasure areas from logging, road construction, gas drilling, and other forms of harmful development;

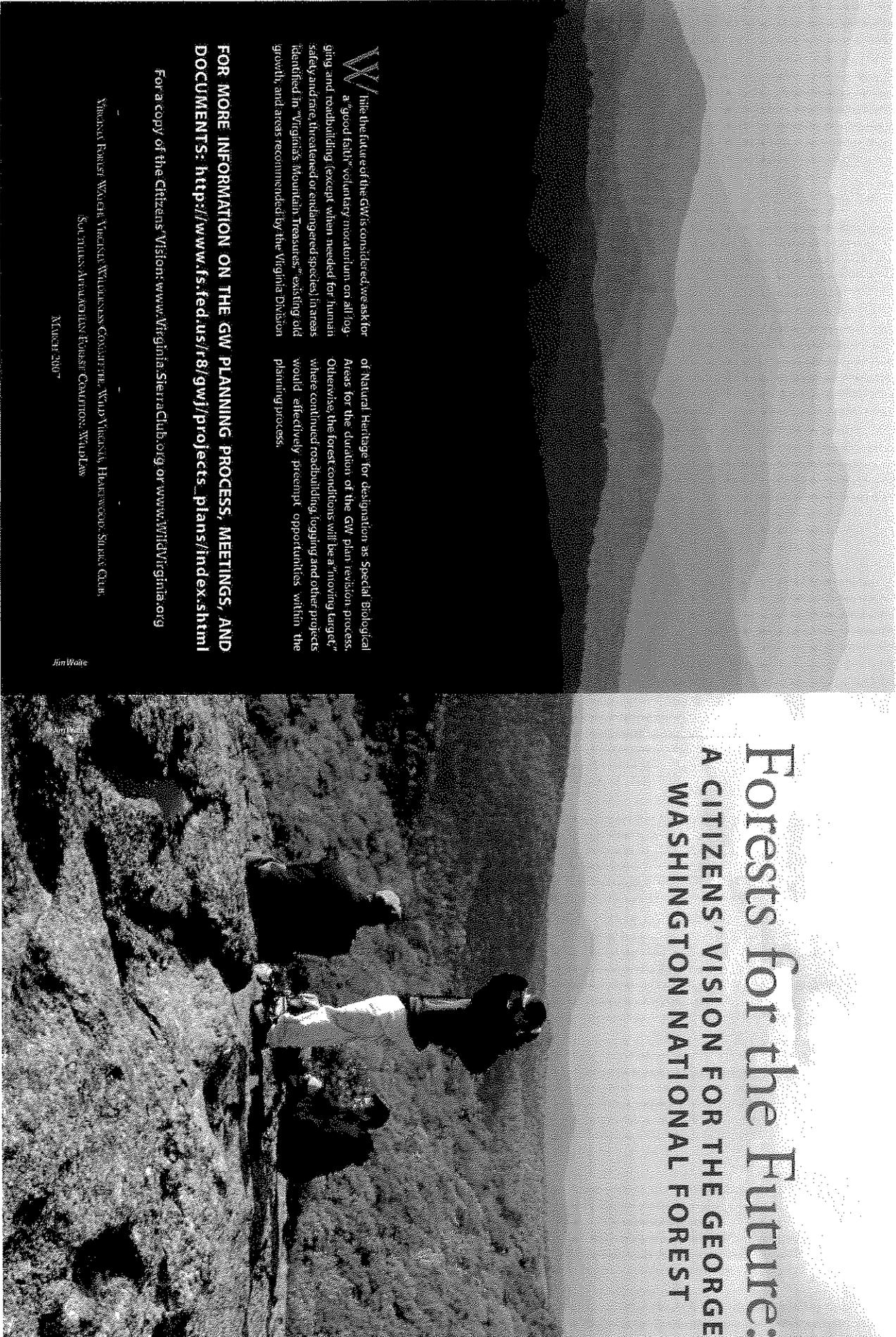
position managed habitats close to existing early successional land uses, such as on private lands, to lessen the impacts of fragmentation across the landscape;

if early successional habitat actually needs to be fabricated, recut sites that were cut in the recent past;

focus on providing habitat for species that require large home ranges, have limited ability to disperse, are sensitive to disturbances onsite, move between different habitats, or are incompatible with edge effects;

close and obliterate roads, plant American chestnut, combat hemlock wooly adelgid and ailanthus; and

ensure that sources of clean water are strictly protected.



Forests for the Future:

A CITIZENS' VISION FOR THE GEORGE WASHINGTON NATIONAL FOREST

While the future of the GW is considered, we ask for a "good faith" voluntary moratorium on all logging and roadbuilding (except when needed for human safety and rare threatened or endangered species) in areas identified in "Virginia's Mountain Treasures," existing old growth, and areas recommended by the Virginia Division

of Natural Heritage for designation as Special Biological Areas for the duration of the GW plan revision process. Otherwise the forest conditions will be a "moving target" where continued roadbuilding, logging and other projects would effectively preempt opportunities within the planning process.

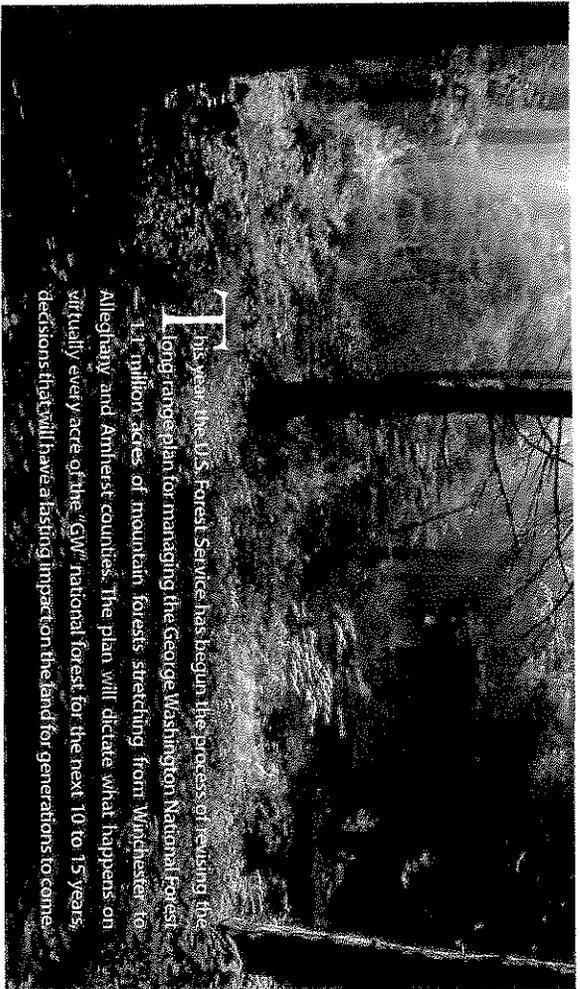
FOR MORE INFORMATION ON THE GW PLANNING PROCESS, MEETINGS, AND DOCUMENTS: http://www.fs.fed.us/r8/gwj/projects_plans/index.shtml

For a copy of the Citizens Vision: www.VirginiaSierraClub.org or www.WildVirginia.org

YVONNE FROST, MICHIGAN TREES FOR WISCONSIN COASTAL WILD VIGILANTE, HAWKWOOD SOLAR CLUB
SOUTHERN APPALACHIAN FOREST COALITION, WUPLEW

March 2007

Jim Waite



© Jim Waite

This year, the U.S. Forest Service has begun the process of revising the long-range plan for managing the George Washington National Forest. 1.7 million acres of mountain forests stretching from Winchester to Allegheny and Amherst counties. The plan will dictate what happens on virtually every acre of the "GW" national forest for the next 10 to 15 years, decisions that will have lasting impact on the land for generations to come.

THIS IS A RARE OPPORTUNITY FOR CITIZENS TO SPEAK UP FOR HOW WE WANT OUR PUBLIC LANDS TO BE MANAGED. RECENT CHANGES IN FEDERAL RULES MAKE THE FOREST SERVICE LESS ACCOUNTABLE FOR ITS ACTIONS AND LIMIT FULL CONSIDERATION OF ENVIRONMENTAL IMPACTS AND MANAGEMENT ALTERNATIVES. NOW MORE THAN EVER, YOUR PARTICIPATION IS VITAL TO ENSURE WE WORK IN COLLABORATION WITH THE AGENCY FOR A BALANCED PLAN.

NOW MORE THAN EVER, YOUR INVOLVEMENT IS VITALLY IMPORTANT!

The GW harbors many natural and cultural resources often not available or protected on private lands, including clean water for fishing and drinking, wildlife habitat for game and non-game species, mountain, native forests, backcountry recreation, scenic views, and much more. In fact, the GW and other Southern Appalachian national forests were created expressly to restore and maintain healthy watersheds. Unfortunately, in the past, the agency has too often focused on logging and roadbuilding over these other values, resulting in an unhealthy forest. The time has come to restore balance.

Fortunately, citizens are increasingly placing greater value on our public lands for outdoor activities and nature tourism, wilderness experiences, and environmental protection of natural resources as we seek to leave a legacy of forest stewardship for our children's children.

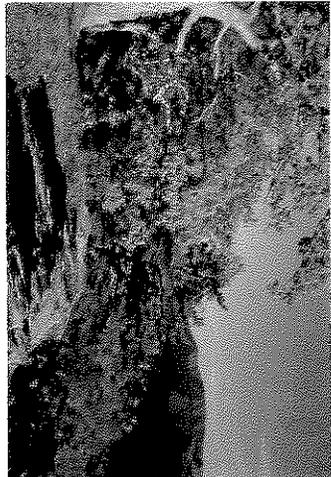
A tradition of conservation groups has set forth a Citizens' Vision for the GW that lays out a common-sense approach for managing our national forest, calling upon the revised management plan for:

- Emphasize backcountry recreation such as hiking, camping, bird-watching, horseback riding, mountain biking, hunting, and fishing.

© Dwight Dyke



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© Lynda Richardson



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- Ensure that all watersheds, sources of clean water, and native brook trout streams are fully protected.
- Fully protect all "inventoried" roadless areas as petitioned by the Governor of Virginia. Identify and fully protect all other remaining roadless tracts.
- Fully protect all areas identified in the forthcoming publication "Virginia's Mountain Treasures: The Unprocessed Wonders of the George Washington National Forest." These areas provide the best, best places for outstanding recreation in the backcountry, and intact habitat for migratory songbirds, black bear and other wildlife.
- Respond to the threat of climate change by restoring and protecting wildlife migration corridors.
- Fully protect all existing old growth and maintain riparian and protecting wildlife migration corridors.
- Fully protect all existing old growth and maintain riparian and protecting wildlife migration corridors.
- Fully protect all areas recommended by the Virginia Division of Natural Heritage for designation as Special Biological Areas. Also thoroughly survey West Virginia lands of the GW for special sites.
- Fully protect all rare, threatened and endangered species listed by the U.S. Fish and Wildlife Service and the Virginia Division of Natural Heritage.
- Fully protect and buffer rare and sensitive habitat conditions such as springs, seeps, rocky slopes and outcrops, steep slopes, sensitive soils, so-called "low productivity sites," and rare forest types.
- Create recovery and re-introduction plans for native species no longer found on the GW, for example, potentially the blight-resistant American chestnut when fully developed. Take vigorous action to protect native species on the GW, particularly hemlocks which are at serious risk from the woolly adelgid, an invasive pest.
- Halt below-crest logging that loses millions of American caryopsis dollars.
- Identify and recommend all areas that qualify for Wilderness Study Area and Wild & Scenic River designation.
- Management objectives should be guided by "A Citizens' Call for Ecological Restoration: Forest Restoration, Principles and Criteria" (*Ecological Restoration*, Vol. 21, No. 1, 2003).
- Address the encroachment of non-native invasive species. Restore remote interior forests to help stop the influx of invasive species by closing unneeded roads that cannot be properly maintained and that act as corridors for many of these invasive species.
- Only when absolutely necessary, use logging to open cleared, shrubby areas used by certain wildlife, and locate any such areas, called "early successional habitat," close to existing roads and existing open areas on private or public lands to lessen the impacts of forest fragmentation across the landscape. If early successional forest must be maintained for some species, then to cut sites that have been recently logged.
- Avoid using "prescribed" burns in main areas and other areas where they are not appropriate, and allow lightning ignitions to burn in a controlled manner.
- Fully recognize the vital role lightning ignitions and other natural disturbances play in promoting biological diversity and new growth and maintaining forest health.



© Bill Lee

A Citizens Action Plan for the George Washington National Forest

Although the Citizens Action Plan for the George Washington National Forest is currently in draft form. Here are some of the major concerns and recommendations the Plan will identify:

Major Internal Threats to the Health and Stability of the George Washington National Forest

In addition to the current external threats of air pollution, water pollution, acid rain, and climate change, serious preventable inside pressures threaten the health and future of our GWNF, most stemming from current policies of the Forest Service. Some of the major threats include:

- **Commercial Logging.** Since 1993, the Forest Service has logged an average of 23.5 million board feet each year.
- **Old Growth Logging.** The Forest Service continues to log irreplaceable old growth sites, some over 150 years old.
- **Excessive road building.** Over 2,606 miles of Forest Service, local, state, and federal roads pass through the forest. New roads continue to be built every day.
- **Off-road Vehicles.** Illegal use of off-highway vehicles (OHVs) is a growing and serious threat to the health and future of our GWNF.
- **Invasive Species.** Poor management has created conditions that are ideal for invasive species overgrowth.
- **Energy Development.** Developing natural gas and wind energy can permanently alter ecosystems and the landscape.
- **Mismanagement.** Current management is frequently cost intensive, energy intensive, and at cross purposes with the prime directive of conservation.

Specific Recommendations of the Citizens' Action Plan

More than ever, we depend upon our natural wild places to clear our minds, refresh our spirits, and restore our souls. When our valuable resources are harmed, we all suffer the losses of clean water, scenic beauty, recreation, and livelihood. To protect our irreplaceable wildlands, the Citizens' Action Plan calls upon our Forest Service, public servants entrusted with the stewardship of our George Washington National Forest, to

- make restoration and sound, ethical management a budgetary priority;

- manage our GWNF, which are public lands, for values and resources that are not ordinarily available or protected on private lands;
- identify all lightly roaded or mostly intact mature forest areas, old growth, uncommon forest types, special ecological areas and conditions, rare species locations, and intact watersheds, drinking water sources, and trail sites, and strictly protect them all from logging, road construction, drilling, mining, grazing, and other development;
- manage for early successional habitat on public forest lands in a way that does not jeopardize the integrity of large, intact, older forest areas;
- protect existing mature and old-growth forests from logging and other harm;
- use natural disturbance regimes as models in managing forests for biological diversity and permit natural disturbance events where possible;
- cut back on intentional burns and allow lightning ignitions to burn in a contained manner;
- connect and enlarge mature forest patches wherever possible through road decommissioning and other restoration efforts;
- protect the over 60 identified Virginia Mountain Treasure areas from logging, road construction, gas drilling, and other forms of harmful development;
- position managed habitats close to existing early successional land uses, such as on private lands, to lessen the impacts of fragmentation across the landscape;
- if early successional habitat actually needs to be fabricated, recruit sites that were cut in the recent past;
- focus on providing habitat for species that require large home ranges, have limited ability to disperse, are sensitive to disturbances onsite, move between different habitats, or are incompatible with edge effects;
- close and obliterate roads, plant American chestnut, combat hemlock wooly adelgid and ailanthus; and
- ensure that sources of clean water be strictly protected.

Hoover Creek Sale in George Washington

Sierrans gather for the "Tour de Cur" in George Washington National Forest's mesophytic old growth.

The sales is planned by the FS for within the year. Jefferson Forest Plan Revision Citizen's Workshop

Roanoke -- FS Office to Join with FOJG group 748-7842
Format for Public Involvement before the release of Draft

August 23, 2002. 6:00 p.m. until 9:00 p.m.
Staffed Stations (**see below)

• Handout explaining stations (also contact person [greeter] to answer questions about stations)

Meeting information available:
Draft Forest Plan information

- Forest-wide Standards
- Prescriptions and Standards
- Management Area Direction

Black & White "Alternative T" Maps on 11x17 " paper
"Alternative T" with overlays at Forest-wide scale (1:168959)

- Roadless Overlay
- ROS Overlay

Management Direction underlying "Alternative T" at District scale (1:63360)

- Timber suitability
- Scenic Integrity Objectives
- Old growth forest
- Mineral leasing and private rights
- Options for wildlife habitat

Effects Analysis

- Age Class Distribution
- Probable Timber Outputs

Roads Analysis

- Areas where site-specific roads analysis is required
- Areas with No new road construction/reconstruction
- Areas where decommissioning is emphasized

Inventory Information

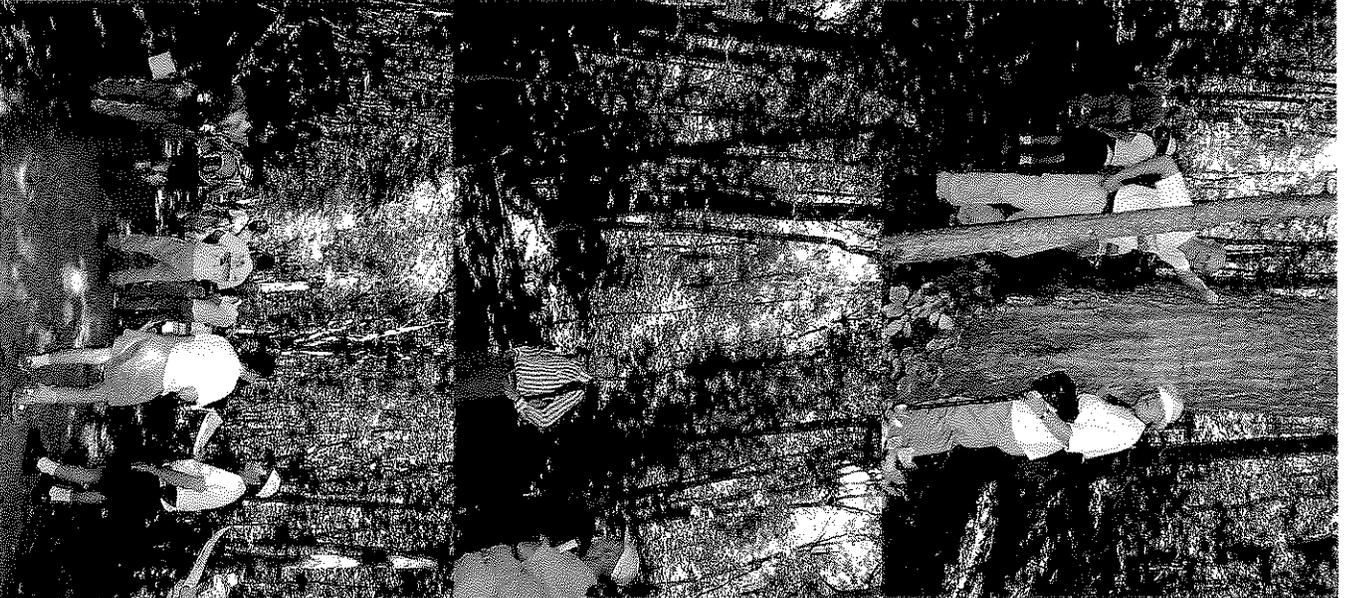
- Eligible W/S Rivers
- Transportation System
- Trail System
- Priority Conservation Watersheds
- Roadless Area Evaluations
- Forest community types
- Threatened, endangered, sensitive, and locally rare species list

August 24, 2002 Agenda:

8:30 – 8:40 a.m. Welcome from Bill
8:45 – 9:45 a.m. Forestwide Discussion

OBJECTIVE: Discuss broad Forestwide changes based on the effects analysis.

10:20 – 11:45 a.m. District Breakout Groups
14:20 – 16:30 p.m. Large Group Discussion



Glen Besa, Regional Director and Virginia Cowles, Biologist Aubrey Neas

Dave Muhlly, Regional Appalachian SAHE Coordinator, Aubrey Neas, and Tyla Matteson. The Hoover Creek endangered mesophytic (moist) old growth forest below the glacier level at perma-

Office of the Governor Timothy M. Kaine FOR IMMEDIATE RELEASE June 21, 2006
Contact: Kevin Hall Phone: (804) 225-4260 Cell Phone: (804) 393-9406
Internet: www.governor.virginia.gov

GOVERNOR KAINE ANNOUNCES FEDERAL APPROVAL OF STATE FOREST PROTECTION PROPOSAL

~ State continues to seek maximum protection of 380,000 acres of forest area ~

RICHMOND - Governor Timothy M. Kaine today announced that the U.S. Department of Agriculture has accepted Virginia's petition seeking increased environmental protection of more than 380,000 acres of undeveloped roadless land in the George Washington and Jefferson National Forests. This federal approval initiates a process for the federal government and Virginia to work together to draft a rule for conserving these roadless areas.

In March, Governor Kaine asked that the U.S. Forest Service manage Virginia's roadless areas according to the terms of the national 2001 Roadless Area Conservation Rule, which prohibited new roadbuilding in these natural areas unless necessary for public health and safety. The 2001 rule was replaced by the Bush Administration last year with a state-by-state petition process requiring governors to petition for more, or less, protection than specified under existing forest management plans.

Virginia has the most roadless acreage of any state in the East. These remote areas on the publicly owned national forest - 22% of the state's national forest - provide some of Virginia's premiere outdoor recreation, wildlife habitat, and clean water, and are increasingly important for tourism.

"I believe that, by moving toward the more balanced management of these areas envisioned under the 2001 rule, these roadless areas will continue to provide vibrant wildlife habitat, outstanding recreation opportunities, and clean drinking water for Virginians, now and into the future," Governor Kaine said. "I look forward now to working with the Forest Service to develop rules that will achieve the strongest, long-term protection of the maximum amount of undeveloped acreage in our national forests."

Virginia's petition noted that, over time, Virginians have sent approximately 90,000 comments to the Forest Service supporting full protection of roadless areas. It cited a U.S. Forest Service estimate that demand for backcountry recreation in the national forests is projected to increase 170% by the year 2050. The petition also said that Virginia's national forests already have 3,000 miles of roads, with an accompanying maintenance backlog estimated at \$20 million.

The USDA has also accepted petitions by the governors of North Carolina and South Carolina, who also sought full protection consistent with the 2001 rule for the roadless areas in their states.

###

**VIRGINIA FOREST INVESTMENT, L.L.C.
HAS ACQUIRED
82,000 ACRES OF BEAR ISLAND TIMBERLANDS.**

Virginia Forest Investment, L.L.C. is selling a few select, individual parcels in the following counties, only:

POWHATAN:	3,586 Acres
CHESTERFIELD:	4,207 Acres
ORANGE:	2,704 Acres
AMELIA:	6,326 Acres

Prices range from \$695 to \$3,500 per acre including all timber. Tracts range from 46 to 3,700 acres in size. Many of these tracts have extensive river frontage; others have excellent development potential. All have been well-managed timberland tracts with great recreational value. The majority of these tracts have not been on the market for more than 50 years.

For information on these lands
Contact David Hardey or Vernon Ward at 804-385-7787
or Pat Patton at 912-477-1000



Timberland Report

VOL. 1, NO. 3

JAMES W. SEWALL COMPANY
ESTABLISHED 1999

Southern Timberland Activity

This issue was delayed slightly in order to incorporate late-breaking news on timberland transactions.

OVER TWO MILLION ACRES CHANGING HANDS IN 1999

An unusually large number of timberland transactions over 100,000 acres have occurred this year in the South, with a couple more still in the works. Here is the year in review:

January

Kimberly-Clark announced an agreement to sell the remainder of its timberland assets (529,000 acres) in the Southeast. That deal later fell through (but see June).

Alliance Forest Products announced it would sell its 370,000 acres of timberland acquired with its purchase of Kimberly-Clark's Coosa Pines mill in central Alabama.

March

The St. Joe Company announced a plan to sell 800,000 acres of timberland in northwest Florida in 100,000 acre increments. The first block of 100,000 acres was to go on the market immediately.

April

Chesapeake Corporation announced it had agreed to sell 278,000 acres in Virginia, Maryland and Delaware to the Hancock Timber Resource Group and had agreed to sell its building products business to St Laurent Paperboard. The combined sales price was reported as \$186 million. This turns out to be the lowest price per acre for timberland of any of the major transactions. If no value is assigned to the building products business, the per acre value of the timberland would be \$670 per acre. If \$30 million is (arbitrarily) chosen as the value of the building products business, the per acre value of the timberland would be \$560. In August, Hancock Timber announced that The Conservation Fund would purchase 76,000 acres of the timberland on the Delmarva Peninsula.

May

Bear Island Paper announced the sale of 82,000 acres in Virginia to Virginia Forest Investments LLC for approximately \$80 million. Within a few weeks, Virginia Forest Investments had purchased another 26,000 acres from Bear Island. (The price for this second block was not published).

June

Kimberly-Clark announced a new agreement to sell 460,000 acres of timberland in Alabama, Mississippi and Tennessee to Joshua Management LLC of Brookhaven, MS for approximately \$400 million. An additional 69,000 acres were sold to various conservation groups and state agencies.

July

The St. Joe Company announced that it had sold 13,275 acres of timberland to the State of Florida for just under \$750 per acre. However, it withdrew the rest of its timberland from the market. The company cited weak market conditions due in part to the large supply of timberland on the market. The company's press release did not clearly indicate whether this was a temporary withdrawal or if it would develop a new strategy for its timberland holdings.

Smurfit-Stone Container announced that it had sold 980,000 acres in Florida and Georgia to Rayonier for \$725 million. This property consists of 820,000 acres of fee land and 160,000 acres of leases.

October

Bowater announced that it had sold 133,000 acres in North and South Carolina to Wachovia Timberland Investment Management for \$163 million.

News was received as this newsletter was being written that Packaging Corporation of America (a former or soon-to-be former subsidiary of Tenneco) had closed on the deal to sell 244,000 acres in the Mid-South to Forest Systems LLC. The price was not disclosed.

News was also received that Alliance Forest Products has agreed to sell 412,000 acres in Alabama to the Hancock Timber Resource Group for \$312 million. This deal includes 374,000 acres of fee land and 40,000 acres of leases.

Still in the Works

Gilman Paper is selling 100,000 acres in southeast Georgia/northeast Florida.

This list does not include numerous transactions in the 20,000-100,000 acre range, with several more currently in the works. The table below summarizes the eight major Southern sales which have closed or for which agreements have been announced so far this year.

Seller	Buyer	Acres	\$/Acre
Alliance Forest Products	Hancock Timber Resource Group	412,000	\$ 752
Bear Island ¹	Virginia Forest Investments LLC	128,000	\$ 959
Bowater	Wachovia Timberland	133,000	\$ 1,226
Chesapeake ²	Hancock Timber & The Conservation Fund	278,000	< \$ 670
Kimberly-Clark	Joshua Management LLC	460,000	\$ 870
Packaging Corporation of America	Forest Systems LLC	244,000	
St. Joe ³	State of Florida	13,725	\$ 743
Smurfit-Stone	Rayonier	980,000	\$ 740
Total		2,236,725	

¹\$/Acre price was for an initial purchase of 82,000 acres; the price for the additional 46,000 acres was not disclosed.
²Published purchase price includes building products facilities sold to third party.
³87,000 acres were withdrawn from the market after this initial sale.

Table 1—Southern Timberland Transactions Over 100,000 Acres in 1999

VOLUME DISCOUNTS OR MARKET GLUT?

Back in 1996 and 1997, I had a rule of thumb that southern pine plantations were worth about \$1,000 per acre. This varied for an individual property by location, local markets, property size, timber inventory, etc., etc., but it was a reasonable starting place for looking at the world. Table 1 shows an average price of under \$1,000 per acre for the 1999 transactions—sometimes well under. When I heard of all the land on the market early in the year, I expected to see low per acre prices because I expected the timberland buyers would not be able to assemble enough funding to buy everything being offered. The low prices in Table 1 support my hypothesis. However, some of these large transactions are *very large*. It would not be a surprise to find that these very large transactions sold at some volume discount. On the other hand (says the economist), one of the reasons for a volume discount in timberland is that there are fewer players who can handle the large transactions. But three of the buyers in this year's transactions are new names in the business—these companies are less than a year old (some of the principals in these companies have been around for years). There are now more players at this scale than there used to be. More players would suggest there should be less of a volume discount than there used to be and that the lower per acre prices are caused by an oversupply of timberland on the market.

So which is it: volume discount or market glut? I welcome your opinions.

NO RESPECT FOR INDUSTRY TIMBERLAND OWNERS

One of the interesting aspects of this summer's timberland transactions is that most have involved forest industry companies selling to non-industry investors. The single exception was the largest transaction—the nearly 1 million acres purchased from Smurfit-Stone by Rayonier. It is widely held in financial centers that forest products companies should not own timberland, and the stock market's reaction to this transaction clearly illustrates that this belief is strongly held. News wires carried press releases on July 29 and stock market reaction was swift. On July 30, *The Wall Street Journal* reported the transaction and noted that Rayonier shares had fallen \$1.50 per share while Smurfit-Stone had risen \$0.0625 on the day of the announcement.

The two charts below show what has happened to both companies' share prices since then. Rayonier shares (Figure 1) have fallen steadily (until the company announced in early October that it was moving to Jacksonville, Florida—is there a connection here?). In contrast, the now timberland-less Smurfit-Stone has more closely followed the market as a whole (Figure 2). (Given the recent downturn in the market, its shares are now lower than they were at the time of the timberland transaction.)

Note however, that Smurfit-Stone was not rewarded (in the form of increased share prices) for selling off its timberlands. This is not an unusual reaction. In a presentation to the Southern Forest Economics Workers in April I showed that buying, holding, or selling timberland generally has no noticeable impact on stock prices of forest products industry companies. The only people on which it has a significant impact are the poor procurement foresters who must get wood to the mill without the benefit of a timberland base.

While stock prices do not appear to change, is a company selling timberland better off than a company that keeps timberland? Instead of a billion dollars worth of timberland, it has a billion dollars in cash—doesn't that look better on the balance sheet?

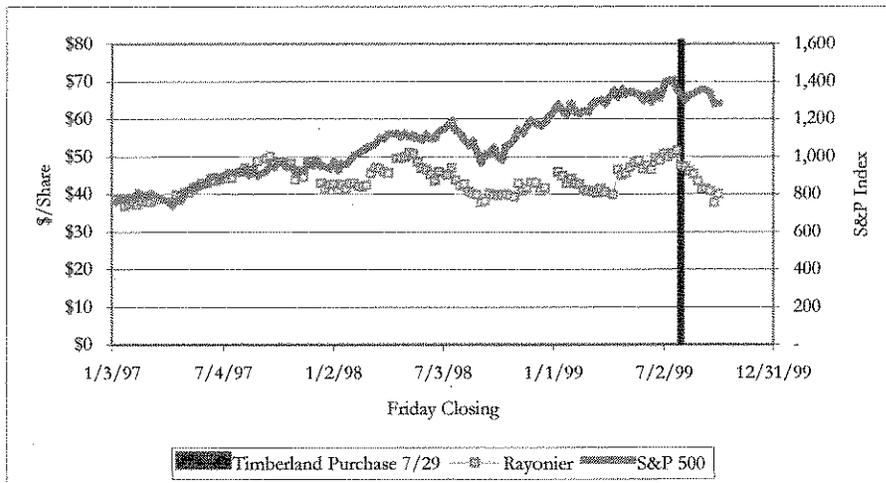


Figure 1—Recent Rayonier Stock Prices

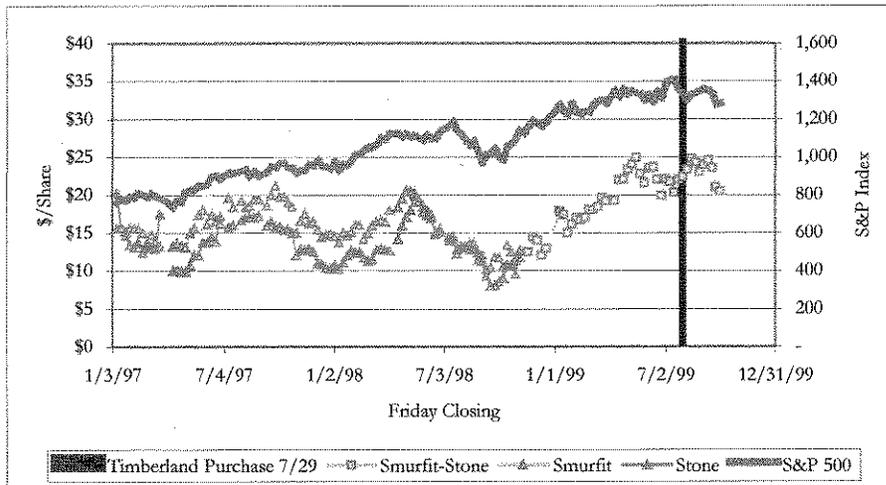


Figure 2—Recent Smurfit-Stone Container Stock Prices

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The *Timberland Report* looks at the timberland investment industry with an emphasis on the United States. The opinions expressed are those of the editor, who is solely responsible for its content, and may not reflect the opinions of James W. Sewall Company.

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George Washington Plan Revision
George Washington & Jefferson National Forest
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

I don't believe the Jefferson National Forest should be used as a base document for the revision. The Jefferson plan has too many management areas that can only lead to confusion and a lack of overall balanced management. This can only lead to appeals and lawsuits which run up the operation costs. In my opinion the Jefferson Forest Plan is not a good or balanced plan for the management of the public land. The Revision for the George Washington National Forest should stand on its own and not be laid over the Jefferson Plan. Such a broad brush approach will not provide a good and balance plan. One size does not fit all. The old plan for the George Washington was a much better plan than the Jefferson yet it still left a lot to be desired in management Direction. Both of these plans had to much of a preservation slant in their directions.

The management of the public land has not been balanced under the existing plans. The habitat for various species of wildlife has deteriorated under those plans. Active management has been lacking on both the George Washington and Jefferson plans. More emphasis must be placed on the management of the timber resource if there is to be a balance in the management of this public land. I recommend that the plan provide for the sale of 60 million board feet of timber a year in various types of sales that include clearcuts, shelterwood cuts and thinnings. In addition there must be a balanced in type of logging sales between helicopter and ground based logging. Many small loggers cannot afford the sales that require helicopters or skyline systems. Such sales only benefit a few.

Thank you for consideration of my thoughts on this important task.

Douglas D Deacon

GEORGE WASHINGTON-JEFFERSON NATIONAL FOREST PLAN REVISION 2007
COMMENTS FROM WEST VIRGINIA SCENIC TRAILS ASSOCIATION (WVSTA)
By Doug Wood

First and foremost, thanks for the opportunity to comment on the plan revision. We will be unable to send a representative to any of the public meetings, so I hope these written comments will be helpful as you steer your way through the revision process.

As Trail Coordinator for Section 4 of the Allegheny Trail, I am responsible for the segment of the Trail that passes through the Eastern Divide Ranger District of the Jefferson Forest unit and the James River District of the George Washington unit. A portion of that segment is not yet completed, and our association has been working with various Forest Service staff persons over the decades to find the best way to put the trail on the ground. Recently, the Great Eastern Trail (GET) organizing committee (the American Hiking Society and several local trail organization partners <http://www.greateasterntrail.org/>) has become very interested in this incomplete portion of the Allegheny Trail. Together, the GET committee and the WVSTA will be working toward development of the GET and the Allegheny Trail through the two ranger districts. Our hope is that we can count on the George Washington-Jefferson National Forest staff to cooperate with us in this worthy endeavor. Signs of that potential cooperation have already surfaced in the districts, so we hope to build upon the good relationship developed over the Allegheny Trail in the past, in order to move forward on the Great Eastern Trail in the future.

The gap in Section 4 of the Allegheny Trail is approximately 10 miles in length. Volunteers have been assessing best potential routes based upon topography, land ownership, scenic views, sensitive plant communities (avoiding them), and potential trailhead locations. Most of this 10-mile stretch could lie on Forest Service property. A few miles of treadwork will be needed. Several miles of brushing and blazing will be needed. Our volunteers are poised to flag potential routes, but it will be fruitless to proceed, if there is no money in the district budgets for reviewing the flagged routes. Once a route through the Forests is approved, WVSTA volunteers are committed to physically developing the Trail in the gap. We will also assist in fundraising for trail improvement projects approved by the Forests. The WVSTA asks the George Washington-Jefferson National Forests to:

- 1 - include completion of the Allegheny Trail as one of its goals in the revised Forest Plan, and
- 2 - budget moneys for environmental review of potential routes for the Trail.

If there is anything else we can do to assist the agency in fulfilling these requests, please feel free to contact me at 304-926-0499 ext. 1091 during weekdays 6am-3pm, or evenings at 304-755-0440. You may also contact me by e-mail. I will follow up this e-mail message with a letterhead copy with my signature.

3/19/07

The Fort Valley Hunt Club Inc. owns a piece of property, 17 acres and a Cabin, off of Mooreland Gap Road in Shenandoah County. The club was incorporated in 1949. I first started coming to the cabin as a guest in 1976 when the forest was pristine, and basically a wilderness. There was much wildlife and the hunting was superb. I am now one of the Officers of the Fort Valley Hunt Club.

Since the fire in the early '80's the mountain has changed for the worst, in my opinion. First it was Commercial Horseback riding from Fort Valley Riding Sables, who illegally cut trails through the Forest and they put our property on their scenic riding trail. With the help of Mr. Coleman and Mr. Buck, they put a stop to the Commercial Horseback Riding due to illegally cutting trails through the GWNF. A special thanks to those guys.

Now we have to endure ATVs and Dirt Bikes. When the ATVs and Dirt Bikes first started, the sport was not as popular, and it was not as much of a nuisance. Now ATVs and Dirt Bikes roam the mountain at will which spoils hunting trips, the fellowship we enjoy, and the quiet peacefulness of our property and the Forest. I understand that ATV and Dirt Bike Riders are supposed to ride on designated trails, but they wonder off their course daily. Many times we have experienced vandalism to our property as a direct result of ATV traffic. Mr. Smalls and Mr. Buck visited our property once to see the damage they had caused, and thanks to them, were able to close some trails that led directly to our property. The both have listened to our concerns over the years. I appreciate what they have done for us.

There is no doubt that there is a correlation between the decline of wildlife i.e. deer, grouse, wild turkeys, etc. due to their habitat being destroyed because of destruction of ATVs and Dirt Bikes. I understand the concept of the Land of Many Uses; however, I feel the ATV trails have gone too far. There is irreversible erosion that has taken place and it must be stopped. Noise pollution is a factor from riders who do not obey the law of having noise suppressors on their ATV or Bike. The litter, noise, and damage that are caused are senseless and disturbing, especially if you own property close to these trails.

If ATVs and Dirt Bikes are here to stay, I suggest constant law enforcement to keep riders on their designated trails and to obey noise ordinances. I suggest that NO MORE TRAILS BE CUT, since they have enough already. Tougher penalties and higher fines for those who violate should be considered. Also, ATV and Dirt Bike Riders should buy a permit. I think anyone who uses the GWNF should help fund the upkeep of the forest. Also, stop ATV, Dirt Bike, and Horse Traffic during all of Deer Season, which is a fair compromise, since they could ride the rest of the year. Deer hunting season starts in the middle of October for Bow and runs through early January for Muzzleloaders.

Please let me know if you have any questions or if I can be of assistance. Thank you for your consideration!

Sincerely,

Donald C. Blankenship
PO Box 231
Woodstock, VA 22664
540-975-1387

March 5, 2007

Dear Forest Service,

I would briefly like to write with concerns regarding the George Washington Plan Revision that is being discussed in public forums this week.

I am a dentist in Richmond Virginia who will be relocating to the area in May. I was fortunate enough to be offered a job in Augusta county to provide medicaid dental care to underserved children in the region, but originally learned of the area through visiting forest such as George Washington. Both of these factors brought me here.

As a conservationist, I am concerned with the long term preservation of this beautiful treasure, but as a park user, I am also concerned about long term access issues, in particular, that of cyclist.

Recently my hip was shattered in an automobile accident which unfortunately left me with a permanent limp, an artificial hip, and an inability to hike long distances. Ironically, I can still ride a bicycle with no impediment whatsoever. Since my accident, my mountain bike in many ways has become my wheelchair, and it has become a way to still visit and enjoy such areas. I am also a nature photographer, and since I can no longer carry heavy photographic equipment on my back, need to be able to carry camera equipment in bags mounted on the bike. In a very real sense, mountain bike access makes the difference between me being able to use the parks, or having to stay out.

For the past several weeks I have been in a state of learning about how wilderness designation benefits the wilderness, but have been concerned about it's exclusion of non-motorized vehicles such as bicycles. Although (to the best of my knowledge) the current forest revision plan doesn't recommend any new wilderness study areas other than the St. Mary's addition, I feel it is important to note that there are groups pushing for the inclusion of area's such as Kelly Mountain, Ramsey's draft addition, and the Little River district. These areas are all beautiful areas that I learned about through cycling, and want to document through photography. If in the future they were proposed before congress as wilderness areas, I would simply lose access to them.

Basically, although this letter does not address any particular issue written in the current forest plan per-se, I do want to take the time to thank the forest service for allowing cyclist in the current areas, and if future re-designations of land status do occur, to encourage inclusion of "scenic areas" to preserve biking access as well as protecting land. In this sense, the current bill regarding Jefferson National forest is a success, and I would like to see that type of cooperation in the future (if not a rewording of the wilderness's current exclusion of bicycles-which would solve the entire issue). I feel that cycling is a low impact activity that distributes forest users over a greater section of trail (as opposed to short distance hikers getting bottlenecked at/overusing the trailhead), and allows people who cant hike long distances (such as myself) to enjoy the forest without having to resort to maintaining and transporting horses (and the subsequent high carbon dioxide releasing trucks and trailers necessary to haul them to the forest). I have also noticed that at least in Richmond, cyclist are some of the most volunteer orientated of the park users, and are willing to donate extensive amounts of time and effort to forest upkeep. In short, cyclist are a

low impact, environmentally friendly resource that will help the common cause of preserving this land. I have decided to move here and provide health care in large part because of the forest. Please include cyclist in the future of George Washington National Forest.

Sincerely,
Ron Spillers D.D.S.



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Wild Virginia

raises these procedural issues in the
2007 George Washington Forest Plan Revision:

1. **The Planning Process Is in Violation of Existing Law**

The Forest Service claims that the GW Forest Plan and Planning Process are exempt from the 25 year old law that mandates that

- the public be involved at each point of the planning process,
- the Fish and Wildlife be consulted regarding rare, threatened and endangered species,
- a broad range of alternatives be created and analyzed,
- cumulative review of projects under the plan be analyzed, and
- the plan be subject to public appeal when it fails to adhere to the National Environmental Policy Act

Although *Defenders of Wildlife v. Johanns* (the illegality of new planning rules) and *Defenders... v. Kimbell* (the illegality of categorically excluding the forest plan from the National Environmental Policy Act) have yet to be decided, the process is being hastened before a ruling can be rendered

2. **The Process Marginalizes Forest Users**

No public meetings are scheduled for Staunton (the home of the Deerfield Ranger District for decades), Charlottesville (the largest urban area in proximity to the GWNF) or Washington DC (the GWNF is the closest National Forest to our Nation's Capitol)

3. **The Process Makes the Forest a Moving Target, and**

Roadbuilding, logging and other projects are allowed to happen during the planning process, effectively changing the face of the forest throughout the process making it impossible to create a plan for the forest "as it stands"

4. **The Plan Makes Itself Irrelevant and Unaccountable.**

The plan defines itself as providing "broad guidance" and as making no decisions that can be "meaningfully evaluated." It avoids substance, clarity and accountability in favor of vague and unenforceable suggestions.

Anne Nielsen
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Please make comments part of your permanent record

I am a forest user. I am an Emeritus Professor of Biology from Blue Ridge Community College. I often took students into the GWNF for field trips, and also on occasion on cleanup days. The College and I had an agreement with the GWNF and the Forest Service to allow collection, under strict conditions, of seedling and sapling trees and shrubs for the BRCC Arboretum, which I, my students and friends initiated and carried to the first 500 specimens. US Forest Service personnel surveyed the arboretum for the first map, which is still in use. I have lived here since 1970, and my family, friends and I have often visited the forest for camping, hiking, bird watching, and wildflower celebration. I am active in the road survey effort by the Shenandoah Chapter of the Virginia Native Plant Society, a cooperative effort with the North River District Office in which our members identify both invasive plants and significant native plant populations deserving of protection from broadcast spraying.

The following are areas of special concern to me:

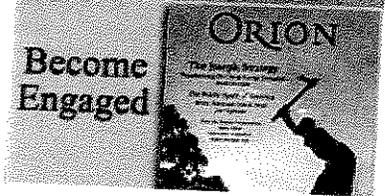
1. **Protect watersheds.** The presence of the National Forests on the western border of Virginia blesses us with the cleanest water in the commonwealth. It is a priceless resource, not only to its citizens, but to all wildlife, and ecosystems contained within it. Allow no mountaintop removal that you might prevent, and closely regulate timbering and extractive processes that almost always impact watersheds.
2. **Focus on protecting and improving ecosystem function** within the GWNF, not just game species, but native species at all classification levels, and the plant communities that support them. To do this a better plan to control exotic, invasive species, particularly of plants and insects, is required. Special protection should be given for significant natural areas, esp. Shenandoah Mt. I do not think that protecting merely the ridge and upper elevation areas is sufficient to ensure the survival of its endemic and threatened populations.
3. **Increase funding for law enforcement.** The pressures from those who would misuse the forest are of growing concern. Both the safety of the forest and its human users are at stake. One man cannot, and should not be expected to do this job, no matter how heroic the attempt.
4. **Protect all inventoried roadless areas, and inventory other significant areas that should be included.** The GW/J National Forest is a green, mostly healthy island in the midst of ever accelerating development. As our population pressures increase, its value to society for recreational use will be appreciated steadily more. Recreational areas will need special protection for both its human users (from disruptive and possibly criminal infringements, such as meth manufacturers and lawless ATV users), and the natural areas in which they are found, as it is known that roads are the major routes for invasive species.
5. **Avoid building new roads wherever possible.** In order to minimize forest fragmentation, with all that implies concerning forest health, try logging on existing roads. This will reduce the cost to the USFS of logging contracts and reduce the impact of logging on other species.
6. **Add more trails for non motorized recreational users,** particularly loop trails of varying lengths that take visitors into the forest. Consider trail head marking in such a way to make them readily recognizable, but less accessible to motorized traffic, such as narrow openings guarded by large trees or boulders. As eastern population pressures continue, the demand for another long trail through the mountains will increase. Compared against its long history, the ATT is practically a highway, and damage to the trail and the ecosystems through which it passes is increasing. I support preserving and promoting the Great Eastern Trail corridor through the GWNF.
7. **Invent, initiate, and promote programs that will bring children into the forest.** Even in the Shenandoah Valley our population is increasingly urban. The children in particular have very little exposure to wild places. Where are the next defenders of GWNF to come from? I am particularly interested in learning more about the U.S. Forest Service "More Kids in the Woods" initiative, as quoted in "Leave No Child Inside" by Richard Louv, Orion Magazine, March-April 07 issue.

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RICHARD LOUV
PHOTOGRAPHS BY KATE ANDERSON

Leave No Child Inside

The growing movement to reconnect children and nature

The movement to reconnect children to the natural world has arisen quickly, spontaneously, and across the usual social, political, and economic dividing lines. Read Richard Louv's article about this

<http://www.orionmagazine.org/pages/om/07-2om/Louv.html>



The Idols of Environmentalism
by CURTIS WHITE
Do environmentalists unwittingly conspire against themselves?
Part one of a two-part series.

A Day of Discovery
by RICHARD PRESTON
Slogging for hours through dense, unforgiving forest, two lost naturalists find the botanical mother lode.

Errands in the Forest
by WILLIAM deBUYS
Return to a place where

crucially important groundswell in the March-April 2007 issue of *Orion*. Then tell us what you think, and share what's happening in your school, neighborhood or town to get kids back to nature.

COMMENT ON THIS ARTICLE

As a boy, I pulled out dozens—perhaps hundreds—of survey stakes in a vain effort to slow the bulldozers that were taking out my woods to make way for a new subdivision. Had I known then what I've since learned from a developer, that I should have simply moved the stakes around to be more effective, I would surely have done that too. So you might imagine my dubiousness when, a few weeks after the publication of my 2005 book, *Last Child in the Woods*, I received an e-mail from Derek Thomas, who introduced himself as vice chairman and chief investment officer of Newland Communities, one of the nation's largest privately owned residential development companies. "I have been reading your new book," he wrote, "and am profoundly disturbed by some of the information you present."

Thomas said he wanted to do something positive. He invited me to an envisioning session in Phoenix to "explore how Newland can improve or redefine our approach to open space preservation and the interaction between our homebuyers and nature." A few weeks later, in a conference room filled with about eighty developers, builders, and real estate marketers, I offered my sermonette. The folks in the crowd were partially responsible for the problem, I suggested, because they destroy natural habitat, design communities in ways that discourage any real contact with nature, and include covenants that virtually criminalize outdoor play—outlawing tree-climbing, fort-building, even chalk-drawing on sidewalks.

I was ready to make a fast exit when Thomas, a bearded man with an avuncular demeanor, stood up and said, "I want you all to go into small groups and solve the problem: how are we going to build communities in the future that actually connect kids with nature?" The room filled with noise and excitement. By the time the groups reassembled to report the ideas they had generated, I had glimpsed the primal power of connecting children and nature: it can inspire unexpected advocates and lure unlikely allies to enter an entirely new place. Call it the doorway effect. Once through the door, they can revisualize seemingly intractable problems and produce solutions they might otherwise never have imagined.

A half hour after Thomas's challenge, the groups reported their ideas. Among them: leave some land and native habitat in place (that's a good start); employ green design principles; incorporate nature trails and natural waterways; throw out the conventional covenants and restrictions that discourage or prohibit natural play and rewrite the rules to encourage it; allow kids to build forts and tree houses or plant gardens; and create small, on-site nature centers.

"Kids could become guides, using cell phones, along nature trails that lead to schools at the edge of the development," someone suggested. Were the men and women in this room just blowing smoke? Maybe. *Developers exploiting our hunger for nature, I thought, just as they market their subdivisions by naming their streets after the trees and streams that they destroy.* But the fact that developers, builders, and real estate marketers would approach Derek Thomas's question with such apparently heartfelt enthusiasm was revealing. The quality of their ideas mattered less than the fact that they had them. While they may not get there themselves, the people in this room were visualizing a very different future. They were undergoing a process of discovery that has proliferated around the country in the past two years, and not only among developers.

For decades, environmental educators, conservationists, and others have worked, often heroically, to bring more children to nature—usually with inadequate support from policymakers. A number of trends, including the recent unexpected national media attention to *Last Child* and "nature-deficit disorder," have now brought the concerns of these veteran advocates before a broader audience. While some may argue that the word "movement" is hyperbole, we do seem to have reached a

nothing is lost, only hidden in a secret inner space that resists being understood.

Intolerable Beauty

PHOTOGRAPHS by CHRIS JORDAN
INTERVIEW by JÖRG COLBERG
A lawyer-turned-artist looks askance at the seduction of consumerism.

Snapshots of My Redneck Brother

by BK LOREN
After twenty years, he brings it all back: Marlboros, motorcycles, and other things best left unmentioned.

Stalking the Vegetannual

by BARBARA KINGSOLVER
Can an imaginary vegetable save us from a detrimental—and botanically outrageous—national cuisine?

Leave No Child Inside

by RICHARD LOUV
The movement to get kids outside is forging new relationships between educators, conservationists, even real estate developers.

Point of View

Change the Focus
by ANDREA JOHNSON
The fight to save diminished forests demands new stories, and a new kind of heroism.

Making Other Arrangements

Orion's new department includes reader's stories of how they are adapting to an oil-scarce future.

Health and the Environment

Beyond the Patient
by LEE THURER
Not just individuals but our entire society is sick.

Small Change

The Crunch
by BILL MCKIBBEN
History may tell us that good causes have time on their side . . . but that was then.

From the Faraway Nearby

The War Against Oblivion
by REBECCA SOLNIT

tipping point. State and regional campaigns, sometimes called Leave No Child Inside, have begun to form in Cincinnati, Cleveland, Chicago, the San Francisco Bay Area, St. Louis, Connecticut, Florida, Colorado, Texas, and elsewhere. A host of related initiatives—among them the simple-living, walkable-cities, nature-education, and land-trust movements—have begun to find common cause, and collective strength, through this issue. The activity has attracted a diverse assortment of people who might otherwise never work together.

In September 2006, the National Conservation Training Center and the Conservation Fund hosted the National Dialogue on Children and Nature in Shepherdstown, West Virginia. The conference drew some 350 people from around the country, representing educators, health-care experts, recreation companies, residential developers, urban planners, conservation agencies, academics, and other groups. Even the Walt Disney Company was represented. Support has also come from religious leaders, liberal and conservative, who understand that all spiritual life begins with a sense of wonder, and that one of the first windows to wonder is the natural world. "Christians should take the lead in reconnecting with nature and disconnecting from machines," writes R. Albert Mohler Jr., president of the Southern Baptist Theological Seminary, the flagship school of the Southern Baptist Convention.

To some extent, the movement is fueled by organizational or economic self-interest. But something deeper is going on here. With its nearly universal appeal, this issue seems to hint at a more atavistic motivation. It may have something to do with what Harvard professor E. O. Wilson calls the biophilia hypothesis, which is that human beings are innately attracted to nature: biologically, we are all still hunters and gatherers, and there is something in us, which we do not fully understand, that needs an occasional immersion in nature. We do know that when people talk about the disconnect between children and nature—if they are old enough to remember a time when outdoor play was the norm—they almost always tell stories about their own childhoods: this tree house or fort, that special woods or ditch or creek or meadow. They recall those "places of initiation," in the words of naturalist Bob Pyle, where they may have first sensed with awe and wonder the largeness of the world seen and unseen. When people share these stories, their cultural, political, and religious walls come tumbling down.

And when that happens, ideas can pour forth—and lead to ever more insightful approaches. It's a short conceptual leap, for example, from the notions generated by Derek Thomas's working group to the creation of a truly sustainable development like the pioneering Village Homes, in Davis, California, where suburban homes are pointed inward toward open green space, vegetable gardens are encouraged, and orchards, not gates or walls, surround the community. And from there, rather than excusing more sprawl with a green patina, developers might even encourage the green redevelopment of portions of strip-mall America into Dutch-style eco-communities, where nature would be an essential strand in the fabric of the urban neighborhood.

In similar ways, the leave-no-child-inside movement could become one of the best ways to challenge other entrenched conceptions—for example, the current, test-centric definition of education reform. Bring unlike-minded people through the doorway to talk about the effect of society's nature-deficit on child development, and pretty soon they'll be asking hard questions: Just why have school districts canceled field trips and recess and environmental education? And why doesn't our school have windows that open and natural light? At a deeper level, when we challenge schools to incorporate place-based learning in the natural world, we will help students realize that school isn't supposed to be a polite form of incarceration, but a portal to the wider world.

All this may be wishful thinking, of course, at least in the short run. But as Martin Luther King Jr. often said, the success of any social movement depends on its ability to show a world where people will want to go. The point is that thinking about children's need for nature helps us begin to paint a picture of that world—

When distant horrors fail to move us, we're in need of a serious reality check.

*The Tangled Bank
Evolving, Swiftly*
by ROBERT MICHAEL PYLE
Animals can adapt to modified habitats, but can humans adapt to save both the animals and themselves?

*Orion Grassroots Network
In Defense of the Web of Life
Spotlight: Southern
Appalachian Biodiversity
Project*

*Coda
The Unfinished Story*
by JOHN LANDRETTI

Sacred and Mundane

Reviews

POEMS:

At the Window
by ANN HUDSON

The Web
by ALISON HAWTHORNE DEMING

Juneau Spring
by DORIANNE LAUX

COMMENT ON THIS ARTICLE

which is something that has to be done, because the price of not painting that picture is too high.

Within the space of a few decades, the way children understand and experience their neighborhoods and the natural world has changed radically. Even as children and teenagers become more aware of global threats to the environment, their physical contact, their intimacy with nature, is fading. As one suburban fifth grader put it to me, in what has become the signature epigram of the children-and-nature movement: "I like to play indoors better 'cause that's where all the electrical outlets are."

His desire is not at all uncommon. In a typical week, only 6 percent of children ages nine to thirteen play outside on their own. Studies by the National Sporting Goods Association and by American Sports Data, a research firm, show a dramatic decline in the past decade in such outdoor activities as swimming and fishing. Even bike riding is down 31 percent since 1995. In San Diego, according to a survey by the nonprofit Aquatic Adventures, 90 percent of inner-city kids do not know how to swim; 34 percent have never been to the beach. In suburban Fort Collins, Colorado, teachers shake their heads in dismay when they describe the many students who have never been to the mountains visible year-round on the western horizon.

Urban, suburban, and even rural parents cite a number of everyday reasons why their children spend less time in nature than they themselves did, including disappearing access to natural areas, competition from television and computers, dangerous traffic, more homework, and other pressures. Most of all, parents cite fear of stranger-danger. Conditioned by round-the-clock news coverage, they believe in an epidemic of abductions by strangers, despite evidence that the number of child-snatchings (about a hundred a year) has remained roughly the same for two decades, and that the rates of violent crimes against young people have fallen to well below 1975 levels.

Yes, there are risks outside our homes. But there are also risks in raising children under virtual protective house arrest: threats to their independent judgment and value of place, to their ability to feel awe and wonder, to their sense of stewardship for the Earth—and, most immediately, threats to their psychological and physical health. The rapid increase in childhood obesity leads many health-care leaders to worry that the current generation of children may be the first since World War II to die at an earlier age than their parents. Getting kids outdoors more, riding bikes, running, swimming—and, especially, experiencing nature directly—could serve as an antidote to much of what ails the young.

The physical benefits are obvious, but other benefits are more subtle and no less important. Take the development of cognitive functioning. Factoring out other variables, studies of students in California and nationwide show that schools that use outdoor classrooms and other forms of experiential education produce significant student gains in social studies, science, language arts, and math. One 2005 study by the California Department of Education found that students in outdoor science programs improved their science testing scores by 27 percent.

And the benefits go beyond test scores. According to a range of studies, children in outdoor-education settings show increases in self-esteem, problem solving, and motivation to learn. "Natural spaces and materials stimulate children's limitless imaginations," says Robin Moore, an international authority on the design of environments for children's play, learning, and education, "and serve as the medium of inventiveness and creativity." Studies of children in schoolyards with both green areas and manufactured play areas have found that children engaged in more creative forms of play in the green areas, and they also played more cooperatively. Recent research also shows a positive correlation between the length of children's attention spans and direct experience in nature. Studies at the University of Illinois show that time in natural settings significantly reduces

symptoms of attention-deficit (hyperactivity) disorder in children as young as age five. The research also shows the experience helps reduce negative stress and protects psychological well being, especially in children undergoing the most stressful life events.

Even without corroborating evidence or institutional help, many parents notice significant changes in their children's stress levels and hyperactivity when they spend time outside. "My son is still on Ritalin, but he's so much calmer in the outdoors that we're seriously considering moving to the mountains," one mother tells me. Could it simply be that he needs more physical activity? "No, he gets that, in sports," she says. Similarly, the back page of an October issue of *San Francisco* magazine displays a vivid photograph of a small boy, eyes wide with excitement and joy, leaping and running on a great expanse of California beach, storm clouds and towering waves behind him. A short article explains that the boy was hyperactive, he had been kicked out of his school, and his parents had not known what to do with him—but they had observed how nature engaged and soothed him. So for years they took their son to beaches, forests, dunes, and rivers to let nature do its work.

The photograph was taken in 1907. The boy was Ansel Adams.

Last spring, I found myself wandering down a path toward the Milwaukee River, where it runs through the urban Riverside Park. At first glance, there was nothing unusual about the young people I encountered. A group of modern inner-city high school students, they dressed in standard hip-hop fashion. I would have expected to see in their eyes the cynicism so fashionable now, the jaded look of what D. H. Lawrence long ago called the "know-it-all state of mind." But not today. Casting their fishing lines from the muddy bank of the Milwaukee River, they were laughing with pleasure. They were totally immersed in the fishing, delighted by the lazy brown river and the landscape of the surrounding park, designed in the late nineteenth century by Frederick Law Olmsted, the founder of American landscape architecture. Ducking a few backcasts, I walked through the woods to the two-story Urban Ecology Center, made of lumber recycled from abandoned buildings.

When this Milwaukee park was established it was a tree-lined valley, with a waterfall, a hill for sledding, and places for skating and swimming, fishing and boating. But when adjacent Riverside High School was expanded in the 1970s, some of the topography was flattened to create sports fields. Industrial and other pollution made the river unfit for human contact, park maintenance declined, and crime became a problem. Then, in the early 1990s, something remarkable happened. A retired biophysicist started a small outdoor-education program in the abandoned park. A dam on the river was removed in 1997, and natural water flow flushed out contaminants. Following a well-established pattern, crime decreased as more people used the park. Over the years, the outdoor-education program evolved into the nonprofit Urban Ecology Center, which annually hosts more than eighteen thousand student visits from twenty-three schools in the surrounding neighborhoods.

The center's director, Ken Leinbach, a former science teacher, was giving me a tour. "Many teachers would like to use outdoor classrooms, but they don't feel they're trained adequately. When the schools partner with us, they don't have to worry about training," he said. An added benefit: the center welcomes kids from the surrounding neighborhood, so they no longer associate the woods only with danger, but with joy and exploration as well. Later, we climbed to the top of a wooden tower, high above the park. Leinbach explained that the tower creates the impression that someone is watching over the kids—literally.

"From up here, I once tracked and gave phone reports to the police about a driver who was trying to hit people on the bike path," he said, looking across the treetops. "Except for that incident, no serious violent crime has occurred in the park in the past five years. We see environmental education as a great tool for

urban revitalization." Even as it shows how nature can be better woven into cities, the Urban Ecology Center also helps paint a portrait of an educational future that many of us would like to see: every school connected to an outdoor classroom, as school districts partner with nature centers, nature preserves, ranches, and farms, to create the new schoolyards.

Such a future is embodied in the nature-themed schools that have begun sprouting up nationwide, like the Schlitz Audubon Nature Center Preschool, where, as the *Milwaukee Journal Sentinel* reported in April 2006, "a 3-year-old can identify a cedar tree and a maple—even if she can't tell you what color pants she's wearing. And a 4-year-old can tell the difference between squirrel and rabbit tracks—even if he can't yet read any of the writing on a map. Young children learn through the sounds, scents, and seasons of the outdoors." Taking cues from the preschool's success in engaging children, an increasing number of nature centers are looking to add preschool programs not only to meet the demand for early childhood education but also to "create outdoor enthusiasts at a young age," the *Journal Sentinel* reported. And their success points to a doorway into the larger challenge—to better care for the health of the Earth.

Studies show that almost to a person conservationists or environmentalists—whatever we want to call them—had some transcendent experience in nature when they were children. For some, the epiphanies took place in a national park; for others, in the clump of trees at the end of the cul-de-sac. But if experiences in nature are radically reduced for future generations, where will stewards of the Earth come from? A few months ago, I visited Ukiah, California, a mountain town nestled in the pines and fog. Ukiah is Spotted Owl Central, a town associated with the swirling controversy regarding logging, old growth, and endangered species. This is one of the most bucolic landscapes in our country, but local educators and parents report that Ukiah kids aren't going outside much anymore. So who will care about the spotted owl in ten or fifteen years?

Federal and state conservation agencies are asking such questions with particular urgency. The reason: though the roads at some U.S. national parks remain clogged, overall visits by Americans have dropped by 25 percent since 1987, few people get far from their cars, and camping is on the decline. And such trends may further reduce political support for parks. In October 2006, the superintendent of Yellowstone National Park joined the cadre of activists around the country calling for a no-child-left-inside campaign to make children more comfortable with the outdoors. In a similar move, the U.S. Forest Service is launching *More Kids in the Woods*, which would fund local efforts to get children outdoors.

Nonprofit environmental organizations are also showing a growing interest in how children engage with nature. In early 2006, the Sierra Club intensified its commitment to connecting children to nature through its Inner City Outings program for at-risk youths, and it has ramped up its legislative efforts in support of environmental education. The National Wildlife Federation is rolling out the Green Hour, a national campaign to persuade parents to encourage their children to spend one hour a day in nature. John Flicker, president of the National Audubon Society, is campaigning for the creation of a family-focused nature center in every congressional district in the nation. "Once these centers are embedded, they're almost impossible to kill," says Flicker. "They help create a political constituency right now, but also build a future political base for conservation."

Proponents of a new San Diego Regional Canyonlands Park, which would protect the city's unique web of urban canyons, have adjusted their efforts to address these younger constituents. "In addition to the other arguments to do this, such as protecting wildlife," says Eric Bowby, Sierra Club Canyons Campaign coordinator, "we've been talking about the health and educational benefits of these canyons to kids. People who may not care about endangered species do care about their kids' health." For conservationists, it could be a small step from initiatives like these to the idea of dedicating a portion of any proposed open space to children and families in the surrounding area. The acreage could include nature centers,

which ideally would provide outdoor-oriented preschools and other offerings. Of course, such programs must teach children how to step lightly on natural habitats, especially ones with endangered species. But the outdoor experiences of children are essential for the survival of conservation. And so the truth is that the human child in nature may be the most important indicator species of future sustainability.

The future of children in nature has profound implications not only for the conservation of land but also for the direction of the environmental movement. If society embraces something as simple as the health benefits of nature experiences for children, it may begin to re-evaluate the worth of "the environment." While public-health experts have traditionally associated environmental health with the absence of toxic pollution, the definition fails to account for an equally valid consideration: how the environment can improve human health. Seen through that doorway, nature isn't a problem, it's the solution: environmentalism is essential to our own well-being. Howard Frumkin, director of the National Center for Environmental Health, points out that future research about the positive health effects of nature should be conducted in collaboration with architects, urban planners, park designers, and landscape architects. "Perhaps we will advise patients to take a few days in the country, to spend time gardening," he wrote in a 2001 *American Journal of Preventive Medicine* article, "or [we will] build hospitals in scenic locations, or plant gardens in rehabilitation centers. Perhaps the . . . organizations that pay for health care will come to fund such interventions, especially if they prove to rival pharmaceuticals in cost and efficacy."

Here's one suggestion for how to accelerate that change, starting with children: nationally and internationally, pediatricians and other health professionals could use office posters, pamphlets, and personal persuasion to promote the physical and mental health benefits of nature play. Such publicity would give added muscle to efforts to reduce child obesity. Ideally, health providers would add nature therapy to the traditional approaches to attention-deficit disorders and childhood depression. This effort might be modeled on the national physical-fitness campaign launched by President John F. Kennedy. We could call the campaign "Grow Outside!"

In every arena, from conservation and health to urban design and education, a growing children-and-nature movement will have no shortage of tools to bring about a world in which we leave no child inside—and no shortage of potential far-reaching benefits. Under the right conditions, cultural and political change can occur rapidly. The recycling and antismoking campaigns are our best examples of how social and political pressure can work hand-in-hand to create a societal transformation in just one generation. The children-and-nature movement has perhaps even greater potential—because it touches something even deeper within us, biologically and spiritually.

In January 2005, I attended a meeting of the Quivira Coalition, a New Mexico organization that brings together ranchers and environmentalists to find common ground. The coalition is now working on a plan to promote ranches as the new schoolyards. When my turn came to speak, I told the audience how, when I was a boy, I pulled out all those survey stakes in an attempt to keep the earthmovers at bay. Afterward, a rancher stood up. He was wearing scuffed boots. His aged jeans had never seen acid wash, only dirt and rock. His face was sunburned and creased. His drooping moustache was white, and he wore thick eyeglasses with heavy plastic frames, stained with sweat. "You know that story you told about pulling up stakes?" he said. "I did that when I was a boy, too."

The crowd laughed. I laughed.

And then the man began to cry. Despite his embarrassment, he continued to speak, describing the source of his sudden grief: that he might belong to one of the last generations of Americans to feel that sense of ownership of land and

nature. The power of this movement lies in that sense, that special place in our hearts, those woods where the bulldozers cannot reach. Developers and environmentalists, corporate CEOs and college professors, rock stars and ranchers may agree on little else, but they agree on this: no one among us wants to be a member of the last generation to pass on to its children the joy of playing outside in nature.

[COMMENT ON THIS ARTICLE](#)

Richard Louv is a veteran columnist with the *San Diego Union-Tribune* and the author of seven books, including, most recently, *Last Child in the Woods*. He is chairman of the Children & Nature Network.

Kate Anderson is the recipient of the Mary C. McLellan Scholarship in Art. Her work has been exhibited recently in the Rockford Art Museum, the Illini Union Art Gallery, and at the Minneapolis College of Art and Design.

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Toward a Superior GWNF Plan, 2007

The following comments are dedicated to the improving the continual superior management of the George Washington National Forest, a priceless resource for the people of the region, the nation, and people of the world.

Plans

I have a home tornado plan. I plan to get up at 6am. I plan to have a committee meeting at 3:30pm. I have a financial plan for my children. My plan: If energy costs increase then I'll implement strategy A; if not, I shall adopt strategy B. I plan for my children to harvest these trees I planted 5 years ago. I have plans drawn for my funeral.

These are all “plans” and reasonable people recognize the differences. The plans for the National Forests have been described and specified in federal law and the nature of the plan and the specifics of what is required cannot be revised as intended by agency heads and now emerging through the GW National Forest Comprehensive Evaluation Report, the CER.

I expect the staff within the plan of the George Washington National Forest, after much expensive planning on how to map, write, and publish such a “plan,” to answer the following questions clearly within sections of draft documents and the final document called the plan. Questions can be re-phrased as issues or problems or as stimulation for needed inclusions. Where a question may not seem appropriate, the intent is to express a thoughtful and sincere citizen request to have the expected answer or its equivalent response included in the new plan. I do not request the waste of time required for a lengthy staff-person response. The questions suggest that the answers are not now seen (or adequate) or available in the public documents available to me.

1. Are the NFMA planning regulations fulfilled to the letter and intent of the regulation that require that public participation “shall be used early and often throughout the development of plans...”; (36 CFR 219.6(c)? (The intent is “to acquire information, provide an opportunity for the Forest Service to understand public concerns and values, and to inform the public of Forest Service planning activities, programs, and proposed actions (36 CFR 219.6(a). Are “dispersed, timed, small-group, break-out sessions” the tested best techniques?
2. How are the rich data base and maps of the Southern Appalachian Assessment to be used and integrated into the plan and that united with data and work for the Jefferson National Forest?
3. Has the decision to coordinate the management of the individual National Forests (GW, Jefferson, and others) been changed and if so why? Cannot the decision be re-stated and the meaning of “coordination” be made explicit so that such progress can be evaluated by the public?
4. How will the Southern Appalachian Assessment be continued, updated, and improved, and provisions in early reports and revisions implemented? What are the milestones or “markers” that the public can expect to see over the next few

years? Inventory plans? Mapping plans? Site index and productivity studies and mapping plans? Integration of Appalachian Trail studies? Decided measures of biodiversity, monitoring, and timing of reports on such achievement or lack thereof?

5. Does recent work on the Appalachian Trail as central to a biodiversity monitoring project fit into your plan or detract from it? What are your criteria for such a decision and investment (or non-investment)?
6. Watershed functions, timber production, and abundance of wild animals are all more related to stand age than to type. Can we see the Forest inventory (not necessarily the maps themselves) (readily gotten from GI Systems and reported-to-be-available data) of all acres of (1) all 10-year age classes, of (2) all types, (3) within reasonable access to all useable public roads within the Forest, (4) on slopes less than 15%, (5) not in intensive recreation areas, (6) not in high visual quality space, (7) not in riparian zones, (8) not adjacent to private-land homes at the Forest edge, and (9) not in designated wilderness or roadless or research areas? Then why not show us the harvest schedules (planned) on these areas that will achieve desired timber production, desired terrestrial faunal production (initially deer, bear, turkey, grouse, “understory songbirds,” “overstory songbirds”), and minimized vertebrate pests? Why would this not be a good basis for all of us to see what is on the Forest and what will change over the next 50 years and provide the schedule and planning base for outfitters, private land owners, loggers, motels and commercial activities, etc.? What more or else would they need for their planning for stabilizing rural development near the Forest?
7. By what legislative provisions are National Forest planning requirements relaxed? “In 2006, following years of controversy and high costs of preparing and defending plans for national Forests, that agency announced “Long-term management plans for national forests will no longer go through a formal environmental impact statement.” The agency said that “writing the 15-year plans had no effect on the environment, making the impact statements unnecessary.” Their conclusion was based on changes to forest planning rules made in 2005 and a past U.S. Supreme Court ruling that says a plan is a statement of intent and does not cause anything to happen! The definition or the logic is so astoundingly muddled that it discourages discussion. The Forest plan is required by law and the judgment of whether it is an acceptable or not has to entail documenting what its impacts will be. The agency just wanted no further planning, at least in the way it was then done. If it truly “had no effect on the environment” then I agreed ... lets’ stop. But I disagreed that plans, even poor one, among the dozens that I had studied, have no effect. (The effects could have been on the users...on the environment ... or the budgeted support ...or aliens.)” (*Giles, in preparation*)
8. Since old-growth issues remain critical for scenic, riparian, roadless and wild faunal resources and these issues are continually spoken in all public inputs to the USFS, why are they ignored? Cannot we accept that the old-age classes are valuable to the future forest, to wild fauna – from very small to very large – and to many people? Must we continually discuss this issue? Aren’t old growth stands few because of past human behavior and don’t they need special attention, consideration for light treatment, and continual study?
9. What are “*late successional or old growth needs*”? How can we know whether they have been met? (C-4 oldgrowth)

10. Can't planned pine conversion and plantations be accommodated on some specially-selected GIS-designated areas?
11. What is the Forest's staff definition of "fragmentation" (the definitions vary) and how will it be measured and compared to the existing conditions? What is the criterion for excellent fragmentation? Or lack of it?
12. What can't the direction for riparian areas developed by the Southern Appalachian Regional Riparian Team be adopted? What are the limitations and hardships for this Forest? Hasn't enough time and investment been made?
13. Given the historical and current importance of the Forest as a watershed, can't we have presented at least annually a comprehensive water budget of the forest including comparisons of current with past budgets, at least to confirm the assertions of the importance of the Forest to high quality, lasting groundwater supplies and stable wild brook trout environments?
14. Since studies show how variable each watershed is, then are "reference watersheds" now of much value and what are the plans for gaining information about streamflow and runoff under new climate change influences?
15. Can't the endangered faunal and plant species be listed, including the new ones, areas specifically designated as specifically as possible on GIS maps, and species-specific plans "demanded" from the USGS and others for this Forest? Why must we do publically-specified, species-specific work (within the planning process) when the management of endangered species is mandated under more than 15 federal and state laws?
16. Why can't endangered-species maps of a general nature even groups of species) be provided so that areas of probable adverse impact can be avoided or at least personnel put on notice of potential species impacts?
17. Can't "indicator species" be dropped after years of confusion, abuse, and multiple conflicting publications and disagreement on that now-meaningless topic. Can't we specify our species resource objectives and enumerate precisely our best current knowledge of how to achieve them?
18. Why can't a part of the plan address how to get and integrate the work of the regional research components of the National Forest System into management of the GWNF? How can the vast expenditures of this research group and others of the National Forest System be brought to benefit the resources of THIS Forest and its present and future people?
19. Why cannot staff (regional etc.) be helpful in forming volunteer local study groups to investigate, characterize, and help understand and predict the unique special ecological communities of this Forest? Might a part of the plan address the intended steps to do so?
20. Isn't "below-cost" timber sales now a very old conflict and cannot a new approach be used to help the public understand the economics of the total Forest, all resources, all people, discounted over 150 years with specific limits? Why must it be brought up again? Cannot a new and well-informed presentation of the economics of the total system, not just one commodity of the Forest... as if addressing just one monetary aspect of the happy family life? Can't total benefits and total costs be described? Won't the Forest win in such an evaluation?

21. With daily news releases about “out-sourcing” of Forest work, why not include your plans for this, whether it does...and does not... occur? Can’t it have major impacts on required funds, staffing, facilities, and other public investments? Saying it may not be known is a truism, but isn’t that true for all “planning” statements?
22. With returning troops, isn’t some comment about their role in the Forest of the near future (work force, etc) an essential for a comprehensive plan?
23. How will you actively support and promote ecotourism and adventure tourism for the counties and region of the Forest?
24. Isn’t it true that while the former objective of the USFS being community stabilization has been reduced, it remains essential for the Forest to have people to meet its many managerial needs, user rates, fire fighting needs, logging, and user support services? Can’t these be addressed specifically as the quest of “rural stabilization and development” by means of a creative program of work and local regional activity within the Forest?
25. How do you plan to work with the Appalachian Regional Commission to develop coordinated and creative assistance programs for the people of the region?
26. Can’t a poorly planned schedule of harvesting trees (timber production) result in low profits, excessive deer forage, boom and bust songbird populations for tourists and recreationists, and stressed and diseased trees in the future? Can’t you be more specific about how you intend (plan) to harvest what trees on what schedules that will reduce these problems for the future – for staff and public?
27. How do you intend to quell public outcry over timber harvesting on over 300,000 acres when in the past few years only 90,000 acres are harvested? Why is there such a major increase and can it be accommodated by current staff?
28. Will staff increase in the near future when messages of staff cuts are now evident?
29. Why are public technical documents seemingly ignored about the imperfections of a “sustained yield” policy when sustained *profits* are desired? Don’t we know that some sales are now not bid? Don’t we know that all yield will not clear a profit? Don’t we acknowledge of past high-grading of timber? Can’t the universities and consulting foresters and public assist you in communicating to upper levels of the USFS (who have not seen conditions on the ground) the realities of cost effective timber harvesting for timber production and the many other well-quantified forest benefits for which we, the citizens, all yearn?
30. Must we have extended conversations, even litigation, over high-energy-cost helicopter harvesting of timber on otherwise inaccessible, fragile, steep slopes with unusual or unique ecological communities? Can’t we spend tax-payer time on planned, scheduled, informed harvesting of trees profitably from the accessible, non-fragile areas of the forest?
31. What is your plan for unifying the Jefferson and George Washington Forests...all aspects? Why is this not in “the Plan.” Isn’t the present arrangement confusing to the public, cost ineffective, causing staff conflicts, overlaps, inefficiencies, and great uncertainty for the good of this or the combined Forest? Can’t a single superior unified excellently-managed national Forest emerge?
32. Isn’t access one of the dominant dimensions of modern forest management for all resources ... recreation, fisheries, timber production, ecotourism, invasive species

- control, and fire control, wildlife management, etc.? Why is not the transportation/roads system (existing and scheduled) not emphasized in the Plan?
33. Since off-road vehicle use is a recognized soil, water, and land use problem, why is not it addressed in terms of staff and enforcement needs, signage, publications, mapping, critical areas, and undercover enforcement activity for the near future?
 34. Trail building and maintenance are not unexpected costs of providing major year-around access to the potential benefits of the Forest, and so why should not alternative funding sources be sought if there are doubts about funding adequacy for these structures? What are the plans for the trails system under different funding scenarios, including seeking supervised volunteers?
 35. Now that loss of soil fertility is recognized as resulting from salvage and timber production, and that dead and down logs contribute to watershed, wildlife, recreation, and ecological community benefits (including increasing tree rooting structures for moisture and mineral uptake), and that increasing forest soil richness seems unlikely in the near future, isn't a "leave" policy desired for the new plan?
 36. Why is "if funding allows" included in the CER statement about trails? Isn't this true for almost the entire plan and thus how are funds to be allocated to trails building and maintenance as compared to roads, inventory, law enforcement, and other forest activities?
 37. Aren't non-vehicle trails essential to inspecting and understanding the forest, fire control, as well as to a host of other Forest use-rates? What are plans for all-terrain vehicles use as related to global warming, gasoline use, and funding for enforcement and supervision ... and returning post-war troops?
 38. Where is "within the wildland/urban interface zone" and can it be mapped for insurance purposes, private home site selection, and placement of fire fighting staff and equipment? Can't likely expansions of the zone be mapped as well for the planning period?
 39. Following national trends in closing National Forest recreational areas because of budget cuts, what are the planned, sequenced closing plans and listed priorities for closing or limiting use of GW Forest recreational areas?
 40. How do the scenic integrity areas overlap the planned timber production mapped areas? Where are the "view-from" spots and routes? What resources must be foregone if each of 3 levels of scenic areas is imposed on harvesting over the planning period?
 41. Can't planned ecosystem management be addressed to include (a) recent definitions and understanding, (b) monitoring of sites, (c) planned changes in biodiversity indices (actual and desired levels), (d) integrating research results, (e) the role of the coyote, uncontrolled deer populations, and the ash borer, and (f) restoring large-wood-debris or its function in headwater channels?
 42. When will mapping the soils of the forest be completed and reports available?
 43. What is the planned sequence for archaeological studies on the Forest?
 44. Are fire control plans now well coordinated with national security plans, especially as related to rural water supply watersheds on the Forest? If not, are there plans to do so?

45. What are your plans to increase firewood sales and sale areas in the face of rising fossil-fuel costs? Have you related such plans to ecosystem management, salvage policies, as well as to smoke and air quality resulting from such use near the Forest?
46. Can a plan be made to inventory and report on key geologic structures, partially to support ecotourism and partially to avoid conflicts with or damage from other uses and user groups?
47. If a major wind-energy device(s) is installed on the Forest, will it be made inoperable during nocturnal migration periods of birds to avoid their deaths (already reported at many such sites)? Planning for and gaining approval for such a statement is needed, at least for birds.
48. Given sister-agency cutbacks in expert personnel, how will Forest staff plan to address vertebrate pest problems (coyotes, bears, bird roosts, groundhogs, rabbits, squirrels) on the Forest and resulting to others from animals from within the Forest?
49. What are your plans to work with and complement the efforts of the regional land Trusts as they seek conservation easements, etc.? Trust lands adjacent to the Forest (or with in-holdings) can greatly benefit the Forest in many ways.
50. If agency and thus Forest funds are drastically cut, can the proposed plan be implemented? What parts will you implement under 4 likely funding levels? None?

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My name is Rick Layser. I am an Executive Director of the Virginia National Wild Turkey Federation and Volunteer Habitat Pro-Staff member.

The National Wild Turkey Federation supports conservation of the wild turkey and preservation of the hunting tradition. The NWTF has over a half million members. Over seven thousand of these members reside in Virginia.

The NWTF would like to see the national forests managed in accordance with the recommendations of Department of Game and Inland Fisheries Wildlife Biologists.

These recommendations include:

1. Create and maintain balanced forest age classes:
 - 5% herbaceous grass/forbs,
 - 10% early successional forest, <10 years old,
 - 15% young forest habitat, 10-40 years old,
 - 60% mast producing habitat, 40-120 years old,
 - 10% old growth, 120 years and older.

2. Create more early successional habitat.

Many wildlife species, which require this type of forest habitat, are in serious decline (American Woodcock, Yellow-breasted Chat, Golden-winged Warbler, Prairie Warbler, Chestnut-sided Warbler, ect.). In addition, turkeys, deer, grouse and quail and other game species will benefit.

2. Allow timber harvest on more acres of the GWNF.

All acreage within the general wildlife habitat designations should be available for timber harvest, prescribed burning, and active wildlife management.

3. Utilize prescribed fire as a tool to create wildlife habitat on the GWNF.
4. Incorporate new scientific research findings when developing management Guidelines. The Cooperative Alleghany Bear Study, Appalachian Cooperative Grouse Research Project, Turkey Dynamics Study, Turkey Gobbler Study and numerous songbird studies have revealed new information, which needs to be incorporated in the GWNF plan revision.
5. Open road densities should be increased. Open road densities should be determined by biological concerns and the needs for hunter access. You can only drag a harvested deer so far.
6. Cooperate with the VADGIF to meet habitat goals in Virginia's 2006-2015 Deer Management Plan, 2001 Bear Management Plan, and Virginia's Wildlife Action Plan.

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USDA Forest Service
GW and Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

March 2, 2007

In reference to the planning process for the George Washington National Forest I would like the administrative record to reflect the following:

Decrease the use of below cost timber sales as a tool for restoration of species that are already thriving. For example grouse, turkey and deer. Edge effect and fragmentation are already in abundance.

Strive to get to an overall older forest. The Forest Service has a continuity of ownership that the private sector does not enjoy. The idea that an 80-125 year old tree needs to be removed because it's too old is absurd. Do you really believe that we will be using wood for paper, shipping pallets etc., 125 years from now?

Stop fragmentation with all the "temporary" roads and wildlife areas. Nature has survived for 12,000 years here and the supposed fire models of the colonial days are not born out with science.

Make tourism and recreation be the principal use of the forest.

Emphasis should be placed on roadless and wilderness areas and water quality.

Thank you for allowing me to comment upon these matters.

Sincerely,

A handwritten signature in black ink, appearing to be 'Robert Fener', written over a horizontal line.

Robert Fener

Diane Holsinger
853 Newdale School Rd
Timberville, VA 22853

I have conducted Bird Surveys for the Forest & use
GWNF, both for Forest Surveys & Pleasure

I am a bird watcher, & also a member of VA Natural
Plant Society I use the GWNF in many ways
so I am very concerned what will happen
to a part of a natural area that I value
highly.

I would like it to remain as natural &
undisturbed as possible.

Diane Holsinger

10 Mar 2007

--The G.W. Is the largest public land holding in the Commonwealth with over 1 million acres & the 1993 Plan significantly reduced the land available for active habitat management.

--The final revised Jefferson Environmental Impact Statement predicted that all game species except turkeys would decline under the revised plan & the hunter satisfaction would go down in all cases (even turkeys) which we would not want to see on the G.W.

--The 1986 Plan called for 640,166 acres as suitable for timber harvest and the 1993 Plan said only 333,000 acres were suitable.

--In the start of the 1993 Plan approx 3,000 acres p/yr were being harvested & up until now it is down to only 800 acres p/yr.

--Reduction in timber harvest has resulted in predominantly forests mature that are 40% over 100 yrs old & 88% 70 yrs old.

--This reduction has serious implications for wildlife populations that require younger habitat conditions such as the American woodcock, yellow-breasted chat, golden-winged warbler, prairie warbler and chestnut-sided warbler to name a few.

--Further evidence of the need for increased management for early-successional wildlife is provided in several documents

from the professional wildlife community (all enclosed). 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.

--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 Wildlife Division for 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". Recent habitat data and the proposed plan suggest that these broadly held concerns regarding early-successional habitat have been largely ignored by the Forest.

--The forest is maturing faster than natural disturbance is creating young forest hence commercial timber harvesting which has long been recognized as the primary method to create wildlife habitat should be looked upon as the viable source solution.

--Early successional habitat conditions (less than 10 yrs old) & 3 to 5% herbaceous habitat is more ideal brood & songbird habitat.

--4,000 to 5,000 acres p/yr would equate to 400,000 to 500,000 acres on a 100 yr rotation.

--The Plan should include research findings such as Cooperative Bear Study, Appalachian Cooperative Grouse Research Project, Turkey Population Dynamics Study and more.

--Need a diversity of vegetative stages dispersed across the landscape such as 3 to 5% herbaceous grass/forb

habitat, 10 to 15% early successional forest, 15 to 20% young growth (10 to 40 yrs old), 60 to 70% in mast producing habitat (40 to 120 yrs old), and 10 to 15% in old growth/ late successional (120+yrs).

--To create & maintain early successional habitat there must be some clear cutting & prescribed burning thereafter.

--Prescribed burning historically played an important roll by the Indians & settlers to create habitat in forested landscapes for wildlife.

--Proven fact that burning does regenerate oaks.

--Fire should be used in conjunction with active timber management program to achieve the desired future condition for wildlife.

--Fire should be seasonal due to nesting & brooding seasons.

--Recreational access roads should have limited disturbance of wildlife species during breeding, nesting and brooding rearing seasons because of the serious impact of survival rate of the young.

--Road density issues with the goal of seasonal closure to protect wildlife during such times are important but equally important are the later hunting, fishing and trapping seasons which must be considered also.

--Protecting the Threatened & Endangered Sensitive species habiat such as the Indiana bat, Cow Knob

salamander, tiger salamander, wood turtle, James River Spiny mussel and more.

--To maintain all designated wilderness& inventoried roadless areas as mature forests for species required this habitat which thrive there.

Trails designed for any motorized vehicles such as ATVs, dirt bikes and OHVs may not be permitted within one mile of any residences, schools, medical facilities, churches or similar properties. (Trails 553A and 553B are estimated by the Forest Service to be within one-half mile of me and my neighbors. I do not know how close Trail Numbers 553C and 553D are to other residences on Hickory Lane.)

- By USDA administrative regulation or by legislation, no new trails intended for ATV/OHV use should be allowed within one mile of the types of properties mentioned above. Furthermore, all current trails closer than one mile should be closed and returned to nature. For example, closing Trails 553A and 553B would eliminate less than two miles of trail. The Forest Service estimates a total of forty miles for Taskers Gap and Peters Mill trails.

The standards for muffling should be reduced. Current regulations for the Forest Service limit noise to 90 decibels. The standards are based on whether a vehicle has not been modified and adheres to manufacturer's standards. This also assumes that all vehicles are regularly and properly maintained.

- By USDA administrative regulation or by legislation, the allowed decibel level should be lowered to 80 or 85 decibels. Because of the definition of decibel, any reduction would make a considerable difference.

3/3/07

Dave Plunkett
Planning Team Leader
George Washington Plan Revision
George Washington & Jefferson National Forest
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear Sir,

I am writing to you to express my interest in the drafting of the new management plan for the GWF as regards the Great North Mountain area within the Lee Ranger District. I have been going there for recreational purposes for nearly thirty years, and have hiked and mountain biked nearly every trail between Falls Ridge and Laurel Run in the south and the County Line/Tuscarora Trail in the north. My children's first big hikes were up the Mill Mountain Trail to Big Schloss, and I mountain bike within the area frequently.

Great North Mountain is an hour and a half from my door in Arlington, and I consider it one of my top recreation destinations. I hope that access to its trails, in particular for mountain bikers, be maintained in the new plan at the current level. To have a network of trails available to me where I can link together long epic rides is of immeasurable value. Since Christmas I have ridden on Great North Mountain four times, and have two trips lined up with friends for March. I look forward to many more years of riding and enjoying this area, and thank you for your past and future stewardship of this valuable recreational resource.

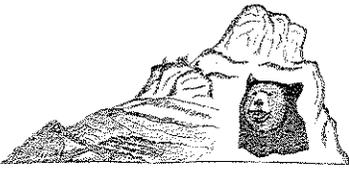
Sincerely yours,



Patrick Phillips

1710 N. Nelson St.
Arlington, VA 22207

Email; philfam@verizon.net



WILD VIRGINIA

Protecting your favorite wild places

434.971.1553 info@wildvirginia.org wildvirginia.org

Wild Virginia

raises these procedural issues in the
2007 George Washington Forest Plan Revision:

my
comments!

- ERNIE

REED

610 FARISH ST

CHARLOTTESVILLE
22902

1. The Planning Process Is in Violation of Existing Law

The Forest Service claims that the GW Forest Plan and Planning Process are exempt from the 25 year old law that mandates that

- the public be involved at each point of the planning process,
- the Fish and Wildlife be consulted regarding rare, threatened and endangered species,
- a broad range of alternatives be created and analyzed,
- cumulative review of projects under the plan be analyzed, and
- the plan be subject to public appeal when it fails to adhere to the National Environmental Policy Act

Although *Defenders of Wildlife v. Johanns* (the illegality of new planning rules) and *Defenders... v. Kimbell* (the illegality of categorically excluding the forest plan from the National Environmental Policy Act) have yet to be decided, the process is being hastened before a ruling can be rendered

2. The Process Marginalizes Forest Users

PLEASE → !

No public meetings are scheduled for Staunton (the home of the Deerfield Ranger District for decades), Charlottesville (the largest urban area in proximity to the GWNF) or Washington DC (the GWNF is the closest National Forest to our Nation's Capitol)

3. The Process Makes the Forest a Moving Target, and

Roadbuilding, logging and other projects are allowed to happen during the planning process, effectively changing the face of the forest throughout the process making it impossible to create a plan for the forest "as it stands"

4. The Plan Makes Itself Irrelevant and Unaccountable.

The plan defines itself as providing "broad guidance" and as making no decisions that can be "meaningfully evaluated." It avoids substance, clarity and accountability in favor of vague and unenforceable suggestions.

GWNF PLAN REVISION – 2007

Some talking points to be considered

There appears to be a communication problem in the Forest Supervisor's Office. Four interested people that we know called requesting hard copies of this proposal but only one received the requested information and documents. Evidently someone in the Public Affairs section believes everybody has computers or access to such. Everyone is not computer literate and a majority of the rural population does not own or have access to such. This must be kept in mind in all the management activities of the National Forest. This public land belongs to all the citizens and not just a few that lives in an urban setting. Therefore it behooves the forest to utilize all communication techniques to reach as many of the interested people as possible. By not responding to requests or telling people it is on the internet is not adequate in dealing with the public as a whole on this or any other issue. This is extremely important in the development of a Forest Management Plan that will give directions for the next ten or fifteen years.

In general the new process is an improvement over the old process. It took from eight to ten years to produce a plan under the old process. It was out of date and obsolete before it ever was approved. Then that obsolete plan was expected to provide sound decisions for another 10 to 15 years. It led to the waste of millions of dollars of tax dollars in preparation and appeals and lawsuits. Under the old process the preparation of the plan began in 1978 and due to appeals was not finalized until 1993. Many Forest Service employees who worked on this plan had retired by the time it was approved in 1993. Now 14 years later we are going to try to use the old GWNF Plan or the Revised Jefferson Plan as the base document for this effort under the new process. If these are used and only modifications are made the revised plan will also be obsolete and out of date before it is finished. If that process (modification of old plan) is used it will only perpetuate unsound and obsolete management direction for this public land due to the obsolete and out of date management information and direction. The monitoring reports of the results of those plans can be used as a guide to prepare a better and up-to-date plan for the future decade.

The new process will supposedly fast track the preparation of the revised plan and provide management guidance for another 10 to 15 years. Supposedly it will not make site specific decisions. This is not an entirely valid statement since some decisions are made such as areas suitable for timber management, areas to be studied for wilderness designation along with other zoning like decisions. Of course some of these are mandated by law but others are not. In this revised plan it should not designate areas to a special management area unless the Management Area is directed by law. Examples of such would be "Roadless Area designations, Remote Back Country Areas, Mountain Crest Areas and Dispersed Recreation Areas. If the revision sets up management areas outside those required by law then NEPA requirements must be met. This would be costly and time consuming as it could be

construed to require more public involvement and the preparation of an EIS. This would defeat the intention of the new process.

Roadless Area designations were dictated by an executive order and not by a law approved by Congress. Such designations must be dropped in the revision. Public involvement was not adequate when this was being considered. Poor maps were provided to the public and meetings were held at the last minute and as such the public input was slanted toward preservation. Any Executive Order can be changed by any future President. The roadless area issue is at present being challenged in various courts. This was a process that does no more than establish wilderness areas which are not legal. Only Congress can designate wilderness areas and they did not act on this issue of roadless area designation. Thus these so called Roadless Areas should be available for resource management including timber sales. Timber sales should be laid out and harvested in these areas. The habitat for various species of wildlife must be considered as well as disease and insect infestations in these areas. If it is desirable not to construct specified roads into and through these areas then one of two vegetative manipulations must be considered: (1) Use temporary roads and when the sale or other management activity is completed close and plant trees or seed to grass the road bed making a linear wildlife opening, (2) Only use helicopter logging to log in these designated areas. Helicopter logging would maintain a roadless character for these areas while permitting active resource management. A large percentage of these areas contain old roads from the logging and iron mining era which are very evident to this day. Some areas even contain specified roads. Thus these are not roadless in the true sense of the word. Timber management and vegetative manipulation in these areas need to be permitted.

The volume to timber harvested from the GWNF needs to be increased in order to maintain a healthy forest and provide the habitat needs of many species of wildlife. This is evident when one examines the monitoring reports for the last decade. These reports shows the forest is getting much older and now the forest has moved into an old growth situation where the majority of the GWNF can now be classed as old growth. This is very evident when one examines the results of the monitoring of various wildlife species. The harvest data released by the Virginia Department of Game and Inland Fisheries shows that the deer harvest from National Forest land has been decreasing alarmingly over the last 15 years. The same is true for ruffed grouse. The monitoring of song birds that require early successional habitat also shows drastic reduction in population levels. This is alarming. This is a direct result of a decrease in the quality of habitat for those species that require early successional habitat. This decrease in quality of habitat is a direct result of not harvesting enough timber distributed over the entire forest for the last 15 to 20 years. This is further pointed out in species like the pileated woodpecker, which require old growth habitat, whose populations are and have been increasing at an accelerated rate. Conversely those species that require early successional habitat populations have been decreasing at an alarming rate. This shows that the Forest habitat has not been managed under a balanced system. The 1993 plan went too

far on a preservation mode of management. The revised plan must increase the volume of timber harvested over the entire forest and on a balanced distribution plan to correct the imbalance between old growth and early successional habitat. To accomplish this in a reasonable time period an annual harvest level of a minimum of 60 mmbf must be offered in addition to any salvage volume from fire, insect or disease impacts. I realize that the amount offered for sale each year depends on the dollars appropriated and that budgets are significantly low. However this won't be the situation forever and the forest must be prepared, through the plan, to offer more timber for sale when budgets get back on track.

In addition a stable supply of wood products must be provided that contributes to the social and economic well being of the people living and working in the National Forest zone of influence. With the consolidation of Ranger Districts the service to the stockholders of the Forest and resource management have been severely reduced. The Forest Service mission statement of "Managing the land and its resources while serving the people" is not being met. The public in the areas of closed districts and the resources in those areas are already showing evidence of being neglected. Timber harvest is an important tool to restore, sustain, and enhance habitat for a wide variety of both plant and animal species. Of the 1,061,125 acres of the GWNF approximately 65% to 67% is classed as unsuitable for timber management. This will not restore, sustain or enhance the balance in wildlife habitat conditions that is needed. This imbalance will lead to rapid spread of disease and insect infestations over the entire forest. The only areas that should be classed as unsuitable for timber management should be the designated wilderness areas and developed recreation areas.

In addition a balance needs to be planned and offered between conventional, skyline and helicopter timber sales. Many small timber harvesting companies who depend on the harvest of timber for their livelihood cannot afford to purchase sales that require skyline or helicopter equipment due to the expense involved. This reduces competition for the sales and results in lower bid prices. For every million board feet of timber offered in helicopter and skyline sales the Forest needs to offer a million board feet in separate sales for conventional logging.

The sale of timber from National Forest is very important to the local economies of the rural area where the forest is located. The harvest and sale of timber brings new dollars into an area and does not send such dollars out like the sale of gas and oil does. Timber sales provide good paying jobs with good benefits in the local rural areas where this public land is located. Many such areas are economically depressed. Congress has failed to reauthorize the law that paid money direct to the states for schools and roads where national forest land is located. Before that law went into effect six years ago 25% of the revenue obtained from timber sales on National Forest land went to help these rural counties fund the public schools. With the failure of Congress to reauthorize that law the 25 Percent law will now make payments to the rural counties again but at a much lower level due to the Forest Service not selling the volume of timber that it should be selling. In many counties

the Forest Service owns over 40 percent of the land base. This results in a severe impact on the local governments since they cannot tax the National Forest. One way to make up for this is to sell more timber from the National Forest and the Revised Plan should establish the direction to do so.

Many think tourism is the answer to the economic situation in the counties where national forest land is located. They point to designated wilderness areas, trails like the AT, dispersed recreation and developed recreation as having a positive impact on the local economical situation in these rural counties. However these areas bring very little money into the counties where they are located and provide few good jobs. Some areas receive little or no use such as the Rich Hole Wilderness Area and the Rough Mountain Wilderness Area. The people who use such areas bring their food and equipment with them when they visit such areas. The only areas that bring some new dollars into an area are highly developed areas like Lake Moomaw, Sherando Lake and Trout Pond which fall under the heading of destination areas and their impact is seasonal. They provide few jobs in these rural areas. Timber sales bring more dollars into these rural counties than any other activity on national forest land. Tourism is not the answer to the economic woes of the counties where national forest land is located. Trails, wilderness areas and other such management areas have virtually no impact on the local economies of the counties where national forest land is located.

The only activities, other than timber sales, which have a positive impact on the economic situation in these counties are hunting and fishing and due to the quality of the habitat on national forest today it is minimal. ~~Big game hunting~~ has the potential of having a large positive impact in these counties due to the people from other areas who come to hunt. While here they camp and purchase supplies locally. However with the deterioration of the quality of habitat for deer, grouse and turkey on the national forest the attraction of national forest land for such hunting experience has been greatly reduced. Based on harvest information more people are now hunting on private property where farming and timber harvest occurs. The reduction of timber harvest on national forest land has forced the timber industry to turn to private property for timber. This is main reason for the improvement of the habitat for deer and grouse on private property. The habitat quality is much better on the private property due to the active management conducted there. Much of this land is leased to individuals and groups and is not available to the average person. The Forest Service must become more active in its management activities that can improve the quality of wildlife habitat on the public land. The best and most economical manner to do this is through timber sales.

There are enough designated wilderness areas on the GWNF. In the plan revision no additional areas should be designated as "wilderness study areas". Additional designated or proposed wilderness areas are not warranted. In addition there is enough area in the designated wilderness areas to satisfy any old growth requirement or need. The forest does not need more than 35 percent of the land base in management prescriptions that lead to old growth. This will more than meet

the old growth requirements and those areas classed as wilderness or classed in a preservation mode should count toward this amount of old growth. In addition to get proper distribution of age classes of timber over the forest it is necessary that some areas that may be classed as old growth be harvested.

The visions outlined for various species of wildlife will not be realized unless more of the forest is classified as suitable for timber management. This would and should lead to an increase in the volume of timber placed on the market. To improve the quality of habitat for various species of wildlife a minimum of 65 percent must be classed as suitable for timber management. The timber management program must be increased in the revised plan.

Timber sales are capable of opening up vistas along the AT and other hiking and horse back riding trails. Such sales would provide a mosaic of patterns in the viewshed. The forest in its planning should remember that during the high use period a large percentage of the viewshed is hidden by the vegetative cover during the leaf on season which runs from late April to November. There should not be any large unmanaged zones along such trails and roads (state and forest service) classed as scenic. The plan should provide for a variety of visual experiences for those hiking, riding horses, or driving on roads and state highways that go through the national forest. The Forest Planner must remember that a National Forest is not a National Park and thus should resist any and all efforts to make the revised plan a preservation plan.

Recently there has been a controversy over a proposal by the administration to sell some tracts of national forest land. This should be restricted to those isolated tracts that cannot be consolidated with the main holdings or contribute toward the mission of the Forest Service. These isolated tracts should be sold on the open market in order to get this land back in the local tax base. This would help the local governments who are facing economic hardships. Due to location and size they cannot be managed to meet the management objectives for national forests. The Forest Service should not wait forever to dispose of such tracts through land exchanges. That is not working anymore. The money derived from such sales should then be used to purchase land under a willing buyer - willing seller basis such as inholdings in large tracts for consolidation purposes. In addition such revenues derived from such sales could be used to either purchase or build an office for the James River Ranger District which would save money now spent on rent.

Timber sales are a tool that can be used extensively to meet wildlife habitat and other resource needs efficiently and at a reduced cost. The majority of the lands on the GWNF can be logged without causing damage to other resources by use of today's knowledge and equipment. More timber must be harvested to stop the deterioration of the timber and wildlife resources. In the revised plan the amount of land classed as suitable for timber management must be increased. The acres of suitable land should not be any less than 500,000 to 600,000 acres. As the age of the timber gets older it deteriorates and begins to fall apart. This also leads to a change

in timber types from the oak – hickory forest to a maple, gum, and birch forest. Timber type conversion should not be permitted. Conversion to other timber types is not desirable from a wildlife habitat viewpoint and would have a very negative impact on several species of wildlife. It is also not desirable for the wood using industries. To reverse this trend it is imperative that more timber is sold in order to create a balance in age class distribution. The aging timber is also more vulnerable to gypsy moth and other insects and diseases. An increase in the harvest of timber will reduce the vulnerability of the timber to such.

The decline in the yellow pine species is due primarily to age of the trees and not the lack of fire. As these trees get older it is only natural they are more vulnerable to insect attacks such as the southern pine beetle. The majority of the pines that are native to this area do not need fire to open the cones. The range of white pine is increasing due to the decrease in fire but this is not all bad. Better planning must be used in the determination of where prescribe fire is planned. To me it is not a good policy to use prescribed fire in recreation areas like has been done in the Lake Moomaw area in the past. Actually fire is not natural over most of the GWNF. Natural fires in this area would be caused by dry lightning storms which are the exception and not the rule. A study of fire history shows such fires only occur on certain areas and not over the entire forest. The early settlers set fire to burn these mountains for various reasons; such fires were not natural and should not be used as justifications to increase prescribe fire. The Native Americans did set fire in the major valleys, like the Shenandoah Valley, but did not set fires in the mountainous areas. The use of fire needs to be re-evaluated, especially the locations and amount. Such fires can have a detrimental impact on the wildlife and timber resources. Before prescribe fire is used it must be determined if it is suitable for the areas under consideration and backed by historical information. It should never be used in or near developed recreation areas or areas of dense housing. What counts is the work that is done on the ground and not what is on the paper. A more active management mode must be implemented on the GWNF than what has been used over the last 10 to 15 years.

The Below Cost Timber Sales issue should not be used in an effort to reduce the amount of timber harvested on the National Forest. The benefits derived from an active timber sale program far outweigh the cost of the program. It benefits wildlife and other resources as well as the local rural economy. It is the added costs to satisfy those opposed to timber sales that created the Below Cost Issue in National Forest management. If timber is below cost then all other management activities are also below cost and at a much higher level. There is nothing in the law that requires any program to make a profit. However if certain groups demand that timber must make a profit then all resources must be required to show a profit.

In our review of the documents concerning the revision we found a statement that said the work on the Highlands Scenic Tour was completed. I don't know where this information came from or how provided it but it is far from being completed. The only work that has been accomplished to date on the Highlands Scenic Tour has

been on one overlook, one short trail, entrance station and partial signing of the area. Much additional work is needed to bring this area to its full planned development and vision. It has the potential to provide much information and education to the public on the management of national forest land. It can help this rural area in its economic development efforts. The original concept and development has hardly been started. The Forest Service needs to insure that in the revised plan it is highlighted and the needed improvements are planned and then implemented.

A F M Co
Daniel B. Deeds
8286 Dantel State Park Rd.
Millboro, Va. 24460

George Washington National Forest Plan Revision

Information compiled by Richard Edwards, IMBA Trail Specialist

H'burg Mtg

Handout

The GWNF is revising the forest plan that will guide management of the forest for the next decade. This is your opportunity to offer feedback to the Forest Service about how the forest is managed.

Detailed information about the planning process, a timeline, and the current GW and Jefferson plans are available at http://www.fs.fed.us/r8/gwj/projects_plans/index.shtml

The initial round of public workshops includes a short presentation on the planning process and the new 2005 planning rules. This is followed by break out sessions moderated by Forest Service staff that record comments. You will be asked to comment on what you like about the current plan or forest management and why you like it. Then you will be asked what you dislike about the current plan or forest management and why. This is also an opportunity to recommend changes in management. The comments will be compiled and become part of the public record.

**** During the public workshops ****

Please stay calm and don't get angry. Emotions have run high at some of the meetings and those that got strident have not added credibility to their issues.

Make sure what is recorded on paper accurately reflects your comment. They are looking for concise "bumper sticker" comments. During previous meetings many comments underwent translation during the recording process and the written comments didn't reflect the speaker's intent.

Due to the size of the breakout groups you will probably be able to only comment on one like and two dislikes. The Forest Service has requested that additional comments be submitted in writing.

Do you like that fact that you can work on your trails??

- tell them to continue to promote working relationships with trail users and include shared use trail education

Not happy when the fire bulldozer ran along the Shenandoah Mountain Trail (Southern Traverse)?

- ask for better fire suppression that will not employ trails as fire lines

Afraid of having Whetstone Ridge or Big Schloss closed to bikes?

- tell them you would like special place like this to be protected while allowing for bicycle use to be continued on the trails

Want more trails like Braley's to create connected singletrack loops?

- tell them you want more loop trails that connect

If you have any questions about the current plan or the planning process and what the implications might be for mountain biking please contact Rich Edwards or Chris Scott for more information.

Chris Scott [chris@mountaintouring.com] Virginia IMBA representative
Rich Edwards [rich@imba.com] IMBA Trail Specialist

Suggested Comments for Public Workshops

Likes

- **I like that the current plan allows cyclists to enjoy a primitive backcountry trail experience.**
WHY: "I could ride all day in remote areas and see maybe one other person. I especially enjoy being able to ride the (insert favorite) trail because of its backcountry character and scenic vistas"
- **I like how the Local ranger districts have embraced partnering with volunteers on trail management.**
Why:
 - Provide chainsaw training and certification
 - Volunteer agreements

Recommendations/Dislikes

1. Protect the Shenandoah Mountain area as a special area, possibly as a National Scenic Area.

- WHY:
- Provides permanent protection for 5 inventoried roadless areas
 - Protects the scenic nature and primitive backcountry experience of this area for hikers, hunters, mountain bikers, runners, and fisherman or this and future generations
 - The recreation this area provides is an important part of the local economy both in terms of tourism and making the valley more attractive for business relocation.
 - The population of the valley is growing rapidly and we need to be proactive to preserve the current backcountry experience. "Keep it the way it is"
 - This area is one of the top three mountain bike destinations east of the Mississippi.

2. Adopt GET (Great Eastern Trail) corridor as a shared use trunk (connector) trail.

- WHY:
- The GET trail proposes using the Shenandoah Mountain Trail, North Mountain and other trails to create a continuous corridor that connects all the western districts of the GW national forest.
 - Provides a long distance bike packing and touring route through western Virginia.
 - A shared use project of this type will foster cooperation between hikers, mountain bikers, and equestrians.
 - Will result in new shared use trail development to complete the corridor.

3. Protect Harrisonburg's drinking water supply by creating a wilderness area above the Skidmore Reservoir.

- WHY:
- Protect the Skidmore Fork watershed
 - Protect a source of drinking water for Harrisonburg and Rockingham county.
 - Improved water quality reduces water treatment costs

4. Improve shared use trail opportunities by creating my loop options and more trails in the lower elevations near the forest edge.

- WHY:
- Disperse current and future use over more loops.
 - Reduce the reliance on paved roads, seeing increasing commuter traffic, to create loop rides.
 - Encourage use of forests by kids and less fit hikers and bikers by offering less challenging opportunities that require less climbing.
 - Increase recreation tourism through improved trails.
 - Dispersing use ensures that in 10 years there is still a backcountry experience available that offers solitude.
 - Short connectors could create loops out of existing trails and administrative roads.

Written comments should be submitted by the end of March to be included in the initial comment period. Comments may be submitted later as well, but the earlier the better.

Please send your comments to:

George Washington Plan Revision
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, Virginia 24019-3050

Suggested written comments: (These are recommended comments that focus on recreation, cycling, and responsible forest management. You should decide which of these is personally important to you and include those in your letter. Remember that the planning team wants to know why you believe these suggestions are important. These may also be mentioned during the public workshops if time allows.)

- I like the economic benefit of trails and outdoor recreation
 - Tourism –hikers, trail runners, cyclists, birders, hunters, and fisherman travel hundreds of miles to recreate in the GW. They contribute thousands of dollars to the local economies.
 - Improved quality of life increases the ability of local business to recruit high quality employees. Ex. SRI, Merck
 - Increased property value for valley residents
 - Damascus and Asheville are great examples of the economic benefit of trails and outdoor recreation opportunities.
- I like the emphasis on shared use trail opportunities.
- "I dislike the lack of funding for outdoor recreation, when it is an important economic engine for local economies"
 - Studies of other mtb destinations show an average of \$200 per visitor spent during an overnight stay.
 - A recent survey indicated that 80% of mtb enthusiasts participate in at least one overnight destination mtb trip a year.
 - The survey respondents indicated that scenery, challenge, and exercise were the main reasons for travel
- I dislike the lack of trail loop opportunities. I would like more loop opportunities. There are many places where a short one or two mile connector would create a much larger loop using existing roads and trails.
- I dislike how the trails are permanently altered by fire management.
 - Hand built singletrack trails have been bulldozed into 8' wide fire breaks with no restoration. Ex. Hone Quarry, SMT
 - Trails are a facility and if damaged during fire management they should be restored to their former or future desired condition. This cost should be considered part of the cost of fire management be attributed to the fire management budget.
 - Trails have a construction cost of \$15,000 to \$30,000 per mile.
- Any recreation facilities, including trails, damaged during fire management ops should be restored to previous or desired condition with fire management funds. This cost should be part of the fire management cost analysis.

- I dislike that many of our trails have unsustainable alignments and use old extraction routes. These do little to showcase the landscape of the forest and often result in resource damage from erosion caused by poor design. Please replace these unsustainable trails with sustainable shared trails that reduce maintenance cost and provide a higher quality recreation experience. Build more sidehill singletrack
- All new trails or roads should follow sustainable design principals. This includes following contour alignments, average grades under 10%, and frequent grade reversals.
 - This will result in reduced maintenance costs and reduced resource impact.
 - This will increase the trails sustainable carrying capacity, improve accessibility, and create a higher quality recreation experiences.
- Increased shared use loop opportunities.
- Manage "Remote Backcountry Areas" in the draft GW plan as per the 12C prescription used in the current Jefferson plan.
 - 12C Natural Process in Backcountry Remote Areas, "Management of these area emphasizes a wilderness-like remote recreation experience where mountain bikes are allowed and chainsaws may be used to maintain trails. Areas are 2,500 acres or greater in size, unless the area is adjacent to a wilderness or other backcountry recreation area. Existing roads are decommissioned.", p 41 Summary of the Final EIS and Forest Plan, management bulletin R8-MB 115D
 - Depiction of the proposed "remote backcountry areas" can be found on the "special areas" map on the plan revision document page. <http://www.fs.fed.us/r8/qwj/forestplan/revision/suitable-use-maps/special-areas2.pdf>
 - This management prescription seems to most closely provide the wilderness experience many mountain bikers desire. Bikes are not allowed in Federal Designated Wilderness.
- Increased novice or least challenging trails on forest edge to provide positive front country trail experiences.
 - Health benefits
 - Focuses use on edge of forest, leaving core for primitive recreation.
 - Develop or relocate parking areas on edge of forest when possible to reduce vehicle traffic and shorten drive to forest. Reduce pollution.
- Manage all Inventoried Roadless Areas under the 2001 roadless rule.
- Increase funding for recreation trails to reflect their benefit to the local economies.
- Adopt GET (Great Eastern Trail) corridor as a shared use trunk trail that connects the western GW ranger districts.
- Provide viewshed protection for National Recreation Trails in GW, such as the Wild Oak trail, and the proposed Great Eastern Trail.
- Seasonal road closures during wet seasons or freeze thaw to reduce road maintenance costs.



Keith Wilt

From: Nelson Lafon [Nelson.Lafon@dgif.virginia.gov]
Sent: Tuesday, March 13, 2007 11:18 AM
To: Al Bourgeois; KWilt@superiorconcreteinc.com
Cc: Dave Steffen; David Kocka; Jay Jeffreys; Matt Knox
Subject: RE: Rockingham County deer issues; Deer Plan

I would like to add this to my comments because in Hburg there were comments made that the VDGIF's Deer Mgmt Plan seized to decrease the number on deer on N.F. I didn't argue the point but want to go on record now with the Dept's response. Thanks Keith

Keith:

Good to hear from you. It appears that folks are using the deer trends and population objectives out of context and without needed background. It will help to go to the Virginia Deer Management Plan and the GWNF Comprehensive Evaluation Report. I will point out the relevant info below.

Looking at the Comp Eval Report on the USFS website (<http://www.fs.fed.us/r8/gwj/forestplan/revision/cer-home.shtml>), you will see on page 44-46 the info on deer. The second paragraph shows how deer trends were computed using info we provided. Note that 9 counties showed a 10 yr (1996-2005) trend of stable while 4 counties showed decrease (one of those is Rockingham, though the specific county names are not shown in this document). Also, note the last sentence of that paragraph saying that our data has suggested a decline since 2000. The paragraph under the harvest graph on page 45 talks about the need for more active habitat management to meet deer population objectives.

Population objectives shown in our Deer Management Plan are to be updated every 2 years, as needed, beginning this year, so some of them are likely to change before the GWNF Plan gets finalized (we will make sure this gets noted in that document). I hope I have explained this well enough in the earlier email. Also, it is important to note that the public land objectives shown in the draft plan online right now were generally to stabilize, and no where in the state was the objective to decrease on public lands. On private lands, yes, on public lands, no. Anyone that refers to the private land objective in these meetings needs to be corrected.

Page 48 in the Deer Plan (<http://www.dgif.virginia.gov/draftdeerplan/2006draftdeerplan.pdf>) explains why the objective was stabilize on public lands. This is important. We wish we could always give folks more deer where they want them on public lands, but the biggest constraint is habitat. Without aggressive active management (timber, fire, etc.) over large areas of the National Forest, we will not be able to address demand for higher deer numbers without increasing damage to the understory.

"Despite apparent stakeholder desires for higher deer populations on most public lands, the 2006 deer population objectives (Figure 24) generally promote the stabilization of population growth. Unless biological carrying capacity is increased on public lands via significant landscape-level habitat improvements, it will likely be impossible to stimulate meaningful deer population growth in these areas. Without significant habitat improvements on public lands, even the modest deer population growth that could be achieved with conservative harvest regulations could compound ecosystem impacts and damage concerns of adjoining private landowners."

Pages 22-23 and 52-53 contain a discussion of deer habitat needs. A common theme is the need for more active management for early successional habitat. It should be clear that deer managers do not think current habitat management practices are sufficient to meet the stakeholder demands. See the strategy on page 53: "

- a. Support habitat management objectives on public lands which seek to manipulate vegetation for early successional wildlife."

I think we can all agree that a portion of the deer herd on NF and private land is a "shared" deer herd. It is interesting that someone used this idea to argue against active management on Nat For. We don't have specific data for the area in question, but movements of 0.5 - 1 mi either way from the boundary would be in keeping with what we know about deer behavior. Deer generally don't leave their home range for new food sources, but adjust the core of their home range in response to food conditions. In a good mast year, they probably spend a lot of the fall on Nat Forest. However, throughout much of the year when mast is not available, they likely forage more on private lands within their home range where habitat is more productive. Increasing browse/understory (through fire and timber) within this zone on Nat For, deer would certainly spend more time foraging there and would have better cover from predators. For deer that live within the interior of the Nat For., they "live and die" by the conditions there and cannot depend on adjacent private lands for forage. I am not telling you anything you probably don't already know, but I hope this helps.

One more thing. Many folks will see less need to justify early successional habitat management for deer than the whole host of bird species (songbirds and game birds) that are declining. That's OK and suits us that are concerned about all species. Managing for habitat diversity will benefit deer, too, but deer does not need to be the driver.

Please let me know if you need anything else. Good luck tonight!

3/13/2007

*...and we Elwood
gets a copy. Thanks!*

March 5, 2007

*Copy
mailed
to Elwood*

RE: George Washington National Forest
Second Mountain Road Project
(Off-highway-vehicle trail)
File Code 2410

Good Afternoon,

My name is Sandra F. Morris and what a privilege it is to once again be able to exercise my freedom to speak on the subject of revisions for George Washington National Forest. I'm speaking as a landowner and by request of the majority of landowners of Rawley Springs Retreat Estates, which subdivision adjoins the George Washington National Forest.

The revision that we request is the permanent closure of a gate at the south end of FDR 502, which gate adjoins a private subdivision named Rawley Springs Retreat Estates.

I have been communicating for the last 22 years to the North River District rangers our problems with reference to this gate and have received their sympathy and vague solutions to a major problem suffered by 20 landowners within the subdivision of Rawley Springs Retreat Estates.

Our major problem is the public using the road, which runs through Rawley Springs Retreat Estates to access George Washington National Forest.

Twenty-two years ago this problem existed. Today this problem is unbearable in more ways than one.

Our biggest challenge is the financial cost of maintaining the road. The landowners within the subdivision (with the exception of one party) have done all road maintenance to this road by our private funds. We have never and do not presently receive any County, State or Federal funding for this road.

The State of Virginia Department of Transportation thinks it has transportation woes; it needs to wear the shoes we have worn for the last twenty-two years.

We were informed recently that the Rockingham County Board of Supervisors had a closed-door meeting with regard to our road. They were unwilling to take over the maintenance of this road for public access to the George Washington National Forest, but would, on the other hand, like the road open.

Yes, we understand their position and we understand any similar positions with regard to a "free ride" at the cost of the owners of property within Rawley Springs Retreat Estates. Little do the users of our road realize who is paying for their "free ride", whether they be hunters, ATV enthusiasts, butterfly observers, hikers, bicyclists, mud-bogging participants, photographers, wild game watchers, rare plant lovers, legal and illegal off highway vehicle users.

The road through our subdivision is costing the property owners huge financial difficulties just for us to maintain a driveway to our properties, not including the cost of providing a road to connect the George Washington National Forest.

We have some other concerns and abuses suffered by residents of Rawley Springs Retreat Estates whenever the gate at the south end of FDR 502 remains open, to-wit:

- 1.) Our homes and cabins are vandalized
- 2.) Illegal unloading of ATV's on our private properties
- 3.) Illegal usage of alcohol and drugs
- 4.) Local students who party loud and use our privately funded road to gain access to George Washington National Forest
- 5.) Illegally built and left behind unlawful campfires near our properties; thereby threatening our properties for destruction
- 6.) Poaching is a problem and is encouraged by quick access to US Route 33 through our subdivision.
- 7.) Constant usage of our road to gain access quickly (egress and ingress) to George Washington National Forest—using our privately funded road will save most users about 12 miles of travel
- 8.) Litter daily
- 9.) 350 dirt bikers using our road to gain access once Sunday afternoon after the area had received approximately 3 inches of rain within a 24 hour span
- 10.) Jeep clubs (Mr. Paxton) pawing and digging their way across and through our privately funded road to gain access to the George Washington National Forest for the purpose of vehicle mud baths and bogging.

A few questions and answers:

(Q) Do the majority of landowners within Rawley Springs Retreat Estates believe George Washington National Forest has been a good neighbor?

(A) No.

(Q) Do the majority of landowners within the Rawley Springs Retreat Estates believe George Washington National Forest has the ability to become a better and concerned neighbor?

(A) Yes.

(Q) How do we think they could become a better neighbor to the residents and adjoining landowners of Rawley Springs Retreat Estates?

(A) By requiring the public to use existing accesses provided by George Washington National Forest. The George Washington National Forest has established an access road to access the ATV trail just off of US Route 33 West and just west of FDR 502. This access was partially destroyed by a flood and has not been re-opened due to funding difficulties by George Washington National Forest. Public access to Rocky Run ATV trail and other users of the forest is provided this very day at Clines Hacking Trailhead without restrictions. The George Washington National Forest needs to continue using this access. If George Washington National Forest doesn't have the funding—how do they comprehend that the 20 landowners owning property within the Rawley Springs Retreat Estates has the funding to provide an access into the George Washington National Forest. Our road and driveways were also washed out during the same flood.

Surely any user of the road through our private subdivision would voice their opinion to leave this access gate open because they are not being affected in any manner EXCEPT for a "free ride".

With over 1.1 million acres of land and hundreds of access roads into the forest for all types of recreational activities, the time is NOW for the permanent closure of the gate located at the south end of FDR 502, which gate adjoins a privately funded road located within Rawley Springs Retreat Estates,

This revision is one revision that is very long overdue.

Thank You!



Sandra F. Morris
13140 Spotswood Trl.
Elkton, VA 22827

The West Virginia Bear Hunter's Association

March 6, 2007

To Whom it May Concern:

The West Virginia Bear Hunter's Association strongly opposes the proposal to expand Wilderness Areas in our national Forests by over 30,000 acres. At present, we have over 78,000 acres of wilderness areas in West Virginia alone. How much do we need?

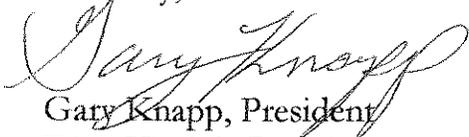
The groups pushing for this Legislation evidently will not be satisfied until they take all our National Forest away from us and have it all become designated as Wilderness Areas. Then, I suppose, they will want to move us off our land and make the entire State of West Virginia a Wilderness Area.

It is a small percentage of the public that want any Wilderness Areas and even a smaller percentage that will even use it. Senior Citizens or Handicapped people like me cannot use these areas at all. We feel that National Forests should be for everyone and not just a select few. The groups wanting these changes are very selfish. They know only a very few people will use these areas and that is what they want.

Attached is a Fact Sheet supplied by the West Virginia Department of Natural Resources containing twenty one facts regarding Wilderness Areas and why we should not expand Wilderness Areas in the State of West Virginia.

Thank you very much for your concern in this matter.

Sincerely,



Gary Knapp, President
West Virginia Bear Hunter's Association
3449 Teays Valley Road
Hurricane, WV 25526

HISTORICALLY SPEAKING -- THINGS THAT YOU CANNOT DO IN
WILDERNESS AREAS

1. Wilderness is created by an act of Congress and can not be changed without federal legislation. Other management prescriptions can be changed or modified through the Forest Service planning process. Historically speaking, Congress does not remove land from Wilderness designation.
2. Wilderness simply stated means no active management of forest types, tree species or the enhancement or development of important wildlife habitats.
3. Wilderness laws and regulations on federal lands often provide exceptions for doing various activities, however, history shows that nearly all management activities are virtually forbidden, or are only allowed at the discretion of the Forest Supervisor. Historically, Forest Supervisors do not approve the various activities.
4. Forest management is not allowed to be used as a tool to create and perpetuate diverse wildlife habitats. Active management of important mast producing (nut and fruit) tree species that are critical to game populations throughout the fall and winter months is prohibited.
5. No commercial timber harvest is allowed.
6. Several thousand acres of high elevation national forest lands recommended for Wilderness have black cherry as their principle mast producing species. Black Cherry needs even aged management and openings to flourish. Most of the black cherry stands on the forest are aging and in decline. Many trees are approaching 90 to 110 years of age which is considered old, and this species will start to die out over the next 20 years.
7. Active management of important timber types (i.e., oak-hickory, mixed hardwoods, northern hardwoods) to perpetuate these important forest communities is prohibited. There would be no dispersed age classes of these forest types or a continuous supply of important and critical mast producing tree species.
8. Combating nonnative, invasive forest insect and disease problems, will be difficult to implement under Wilderness designation. Currently, many of the recommended Wilderness areas have such problems, e.g. beech bark scale disease and hemlock wooly adelgid is killing nearly all the American beech and eastern hemlock they infect. Integrated Pest Management methods to protect Wilderness attributes and adjacent land values and landowner safety is permitted.
9. Vegetation management can not be used to create vistas (viewing areas) or alter the natural environment.
10. Wheeled vehicles cannot be used at anytime i.e., carts, wagons, **mountain bikes**, etc.... only horse or foot travel is permitted. Motorized vehicles, motorized equipment, motor boats and other forms of motorized use or mechanical transport are not allowed.
11. No groups larger than ten individuals at a time may enter a Wilderness area.

12. No permanent structures can be constructed in Wilderness areas – such as limestone treatment facilities used to restore trout streams, without federal legislation.
13. Use of standing timber for fuel wood (includes standing dead trees) is prohibited. Only dead and down wood may be used for fuel.
14. For existing wildlife openings and trail maintenance only hand tools are allowed.
15. The collection of any forest product is prohibited (i.e., mushrooms, ginseng, etc.).
16. Fish stocking is allowed only in those streams or portions of streams where a history of such use exists. Stocking must be by non-mechanical means only, e.g. horseback and backpack. Fish can be stocked by helicopter, provided they don't land.
17. Limestone (fines) treatment of trout streams shall only be allowed where existing roads provide access, or through delivery by other feasible means consistent with the desired Recreation Opportunity Spectrum. Limestone could be delivered by helicopter or into a feeder channel adjacent to a Wilderness boundary.
18. Search and Rescue – Motorized use and mechanized transport may be used for life-threatening situations in search and rescue operations – but is up to the discretion of the Forest Supervisor. However, in reality Forest Supervisors do not necessarily allow this, even in removing a deceased person deep within a Wilderness area. Historical example – On July 20, 2003 the Monongahela National Forest denied permission for rescuers to remove a deceased person from the Dolly Sods Wilderness by wheeled motorized vehicles. A total of eight people were used to carry out the deceased over a distance of three miles taking over 2 ½ hours!
19. Wilderness standards dictate that wildfires will be suppressed. Prescribed fire can occur but only with an approved burn plan. Historically, prescribed fire has never been used in any designated Monongahela Wilderness Area.
20. Tractors, tractor/plows, tracked or wheeled motorized equipment, chainsaws, portable pumps or fire retardants from aircraft can not be used for fire suppression unless approved by the Forest Supervisor.
21. Permits can not be obtained for the storage of personal property, equipment or supplies.

WEST VIRGINIA WILDERNESS FACTS

- 1) Monongahela National Forest
Size - over 919,000 acres

- 2) Five existing Wilderness areas:
 - a. Cranberry Wilderness - 35,864 acres
 - b. Dolly Sods Wilderness - 10,215 acres
 - c. Laurel Fork North Wilderness - 6,055 acres
 - d. Laurel Fork South Wilderness - 5,997 acres
 - e. Otter Creek Wilderness - 20,000 acres

Total 78,131 acres

- 3) Recommended Wilderness - Monongahela National Forest
 - a. Cheat Mountain - 7,955 acres
 - b. Cranberry Expansion - 12,165 acres
 - c. Dry Fork - 761 acres
 - d. Roaring Plains West 6,825 acres

Total 27,706 acres

- 4) Jefferson National Forest
 - a. Mountain Lake Wilderness - 2,528 acres in West Virginia

In Wilderness Areas - Effects on Forest and Wildlife Resources

- a. In Wilderness, natural succession of less desirable tree species (such as red maple or sugar maple, over-topping and killing black cherry) severely hinders available food sources to wildlife during fall and winter months.
- b. Wilderness prohibits the creation of any new early successional habitat such as wildlife openings, linear wildlife openings (such as seeded log roads), cut-back edge borders, savannahs or water holes.
- c. Active forest and wildlife management are inextricably woven together in regard to silvicultural treatments, forest age class distribution and diversity of habitat types to benefit wildlife populations within forest ecosystems and across the forest landscape. Wilderness designation prohibits these practices.

Regulation

The Cato Review of Business & Government

An Economic End to Below-Cost Timber Sales

Donald Leal

Political Economy Research Center

For over a decade, the issue of below-cost timber sales has been the center of efforts to reform management of the Forest Service's timber program. From 1990-92 alone, the Forest Service reported that the program lost nearly \$440 million.

Some environmentalists suggest that the solution is either to stop selling federally owned timber altogether, or to raise the price of Forest Service timber so that it meets the costs incurred in producing it. Neither expedient is necessary. The key to rationalizing the Forest Service timber program is to cut costs, not raise prices. A comparison of timber sales between state and national forests in Montana clearly shows that the Forest Service is losing money on timber sales because its methods are extremely wasteful.

I have examined three distinct growing regions in western Montana over the period 1988-92. In all three, the state of Montana was able to profit selling its timber, while the Forest Service continued to lose money.

In northwest Montana, the state grossed \$2.39 for every dollar spent selling and growing timber, while the nearby Flathead National Forest failed to break even, grossing only 75 cents for every dollar spent. Similarly in southwest Montana, the state grossed \$1.98 for every dollar spent, while the Bitterroot National Forest, grossed only 44 cents for every dollar spent.

Even in the dryer, less productive region of central Montana, the state grossed \$1.07 for every dollar spent, while Gallatin National Forest grossed a paltry 23 cents.

Overall, the state's timber sales earned nearly \$14 million in income from 1988-92, while the 10 national forests in Montana showed a cumulative loss of \$42 million. This is startling, especially when we consider that the state harvested one-twelfth the volume of timber harvested by the Forest Service during this period.

The explanation for this variance cannot lie in natural differences. State forest lands are

often located right next to national forests in western Montana. In addition, timber surveys by the Forest Service conclude that state and national forest have similar growing potentials. Nor is the difference in the demands of management. Both state foresters and the Forest Service must carry out similar duties. Both prepare and administer sales and environmental assessments, build roads, prepare sites for reforestation, and supervise stand improvements. Both are required to integrate timber sales with other uses such as public recreation, livestock grazing, and wildlife habitat.

But the state manages to carry out its forest responsibilities at substantially lower cost. For example, in the northwest region Montana spent an average of \$66 per thousand board feet of harvest to manage its timber program from 1988-92, while Flathead National Forest, located right next to some of Montana's forests, spent 60 percent more-\$106 per thousand board feet. Elsewhere, the cost picture is similar: in Montana's central region, the state's costs averaged \$80 per thousand board feet of harvest versus \$133 on nearby Gallatin National Forest.

The state also manages its labor far more efficiently than the Forest Service. To harvest a given volume of timber, the state used 4.5 hours of labor in central Montana, while the Forest Service used 11.6 hours on Gallatin National Forest.

But it isn't only costs that are out of line. State forests also manage to pull in much higher revenues than their national counterparts. Over the past five years, Montana reaped an average of \$134 per thousand board feet of harvest, compared with \$75 for the national forests in the state. In the central region, the state received an average of \$85 per thousand board feet of harvest, while nearby Gallatin National Forest managed only \$31.

There are many reasons for the differences in revenue. Among them are the quality of the timber sold, the yield per acre, the severity of the restrictions on timber companies, and the amount of mitigation and enhancement activities required. In the Gallatin forest, it seems there was an unusually high volume of salvage timber sales from 1988-92. Salvage sales typically involve selling dead, diseased or burned timber, and naturally they fetch lower than normal prices.

Some might attribute the Forest Service's higher costs and lower revenues to a greater emphasis on maintaining environmental quality. But a 1992 statewide audit of recent harvests ranked the state highest in protecting watersheds among all landowners, including the Forest Service. The audit, requested by the Montana legislature, was conducted by an interdisciplinary team of experts in hydrology, forestry, soil, and biology, and several representatives of environmental groups.

Montana also does a substantially better job of sustaining its quality timber, that is, its trees that are alive and free of disease. Timber surveys by the Forest Service indicate that Montana's state timberlands are closer to their timber-growing potential than nearby national forests. In the national forests, more trees have aged and succumbed to disease.

How is it that two different agencies with such similar lands, similar duties, and with the same market have achieved such drastically different results? The answer to this question will reveal the most sensible policy for managing the sale of federal timber.

I believe the answer lies in the fact that Montana's State Forestry Division has a

constitutional mandate to make money for public schools. The Forest Service has no similar mandate, and no real incentive to control costs because if it loses money selling timber, the difference is merely offset with congressional appropriations.

An ideal solution for introducing efficiency to timber sales would be to shift ownership of the forests to private hands. Barring that, the solution to below-cost timber sales doesn't lie in weaker environmental standards. Nor is it, as some have recommended, to stop selling timber in money-losing forests such as those in Montana. The solution is to introduce the Forest Service, if it is to continue to control those forests, to the profit motive and the discipline of efficiency. Toward this end I recommend the following options:

- Allow each national forest to keep a share (preferably a large share) of the profits from timber management.
- Determine budget appropriations for each forest unit on the basis of net revenues from logging operations instead of harvest targets.
- Earmark net revenues from timber management for a purpose with an identifiable constituency, e.g., endangered species preservation, wilderness preservation, or education.
- Allow other users and outside sources to bid on timber sales and have the option not to harvest.
- Allow outside sources to bid competitively for support functions such as environmental assessments and reforestation.
- Award bonuses to personnel who carry out innovative and cost-effective approaches to timber management and environmental protection.

While those are only initial steps, I believe they provide a basis for restoring fiscal accountability to the Forest Service's timber program. While there is no economic excuse for below-cost timber sales, there is also no economic justification for not selling timber that can make money.

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