

August 7, 2008

Maureen Hyzer  
Forest Supervisor  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019-0019

Dear Maureen,

In April 2007, Brad Kreps submitted several documents to you summarizing key results of our preliminary analysis of optimal management strategies on the George Washington National Forest (GWNF). These documents included recommendations for protecting and managing five large contiguous areas of forest habitat (i.e., what the Conservancy refers to as 'matrix forests'), significant species, natural communities, caves, and aquatic systems, as well as our initial comments and reactions to the Draft Conservation Evaluation Report.

Since that time, the United States Forest Service suspended preparation of the revised GWNF plan when the 2005 planning rule was enjoined and our own Brad Kreps relocated to the Conservancy's Clinch Valley Program in Abingdon, VA. Revision of the GWNF plan resumed with publication in the Federal Register on June 24, 2008 and I have been hired to serve as the Allegheny Highlands Program Director to replace Brad in that capacity and in serving as our representative to the Forest Service during the plan revision process.

I am taking this opportunity to resubmit our comments on the Draft Conservation Evaluation Report (enclosed) and express my desire to continue the close working relationship that I know Brad and others have developed with you and your staff in recent years. I have attended several of the recent public workshops since the planning process has resumed and plan to remain an active participant throughout the entire process. The Conservancy has enjoyed the strong partnership that our organizations have developed to conserve and sustain the incredible biological diversity found in western Virginia and eastern West Virginia and we look forward to expanding our collaboration and success.

I hope to meet you in person sometime soon, but in the meantime, please do not hesitate to contact me if you have any questions about our comments or need further information.

Sincerely,



Marek Smith  
Director, Allegheny Highlands Program  
540-839-3599  
[marek\\_smith@tnc.org](mailto:marek_smith@tnc.org)





**Lynn Cameron**  
<camerosl@jmu.edu>

08/07/2008 08:11 AM

To: comments-southern-georgewashington-jefferson@fs.fed.us  
CC:  
Subject: Comments on GW Plan

Dear Planning Team,

Please accept the attached comments from the Southern Shenandoah Valley Chapter of the Potomac Appalachian Trail Club which is based in the Harrisonburg-Staunton-Waynesboro area.

Thanks.

Lynn Cameron  
Conservation Committee  
SSVC-PATC  
--

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

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



SSVCforestplanletter.doc



August 7, 2008

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

Dear Planning Team:

The Southern Shenandoah Valley Chapter of the Potomac Appalachian Trail Club would like to comment on the draft plan for the George Washington National Forest. The George Washington National Forest is our favorite place to hike, and many of us volunteer to maintain trails in the North River and Lee Districts. We have invested a great deal of sweat in the area, whether hiking or working on trails, and we care deeply about how it is managed. We offer the following comments:

1. We would like to see areas included in *Virginia's Mountain Treasures* protected from logging, roadbuilding, gas leasing, wind turbines, and other forms of development that would mar the natural character of these special places.
2. Please recommend more areas for Wilderness. The George Washington National Forest currently has only 5% Wilderness compared to the national average of 18%. We would particularly like to see the following areas as Wilderness:
  - a. Skidmore Fork
  - b. Little River
  - c. Ramseys Draft Addition
  - d. Laurel Fork
  - e. Beech Lick Knob
  - f. Benson Run

Even if all these areas were added to the Wilderness system, we would be still below the national average.

3. Shenandoah Mountain from Rt. 250 to Rt. 33 is of such significance that it deserves special protection. Please consider some special designation for this area that would permanently protect its tremendous ecological and recreational values. It would make an excellent National Scenic Area with core roadless areas within designated as Wilderness areas.
4. The ecological and recreational values of the mountain ridges in the George Washington are too special to be developed for commercial purposes. We ask that you remove the ridgelines from "suitable" and make them "unsuitable" for wind development.
5. We would like to see more short, easy loop trails for families. Children need appropriate trails where they can learn to appreciate nature. The Braley Pond 3-mile loop is a good model. H. R. 3036 and S.1981, the No Child Left Inside Act, will provide for increased environmental education opportunities for children. Today's little hikers may be tomorrow's public lands advocates. USFS needs to build constituency by creating opportunities for outdoor experiences.

6. Please protect the entire Great Eastern Trail corridor and its viewshed from any form of development that would have a negative impact on scenic, recreational, and ecological qualities. This trail, unlike the Appalachian Trail, will be shared use. We have a rare opportunity to connect existing trails to make this happen. Let's not spoil this opportunity.
7. Please take measures to protect the water supplies which the communities of the Shenandoah Valley will need to ensure their inevitable future growth and development.

Thank you for considering our comments.

Sincerely,

Conservation Committee  
Southern Shenandoah Valley Chapter of Potomac Appalachian Trail Club

Mark Gatewood  
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Charles Price, Chair  
Virginia Chapter - Sierra Club  
422 East Franklin Street, Suite 302  
Richmond, VA 23219

\*If you have any questions about this letter, contact  
\*(804) 358-0256

Aug. 8, '08

George Washington Plan Revision  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019  
[comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)

To Maureen Hyzer, Forest Supervisor, and Planning Staff:

The following are comments on proposed Comprehensive Evaluation Report (CER), Draft Plan, and other issues and analysis related to the George Washington National Forest (GWNF) plan revision and the process for the GWNF Plan Revision. These comments are submitted on behalf of Virginia Chapter-Sierra Club.

The Virginia Chapter of Sierra Club supports and incorporates herein by reference the comments of the Southern Environmental Law Center, The Wilderness Society and others, with the exception of the wind energy position.

We support clean renewable energy development, including wind and solar, in Virginia. At the same time, we have serious reservations regarding the use of many key areas of our limited national forest land as the location for these projects.

Because wind projects tend to be large industrial developments with inevitable adverse impacts, choices regarding wind development can be complex. Wind energy development is not environmentally neutral. Consequently, all decisions regarding proposed wind developments should be carefully considered.

While we do not rule out the opportunities for wind development on all public lands, recognizing the extraordinary natural resource value of our Appalachian forests, we do oppose development in protected areas such as national and state parks, national monuments, wilderness areas, wildlife refuges, designated roadless areas, critical habitat and designated habitat recovery areas for wildlife, areas of cultural significance, sacred lands, and other areas that have special scenic, natural or environmental value. In these areas, it is inappropriate to build wind turbines, roads, transmission lines, or any other structure related to wind development. Very limited exceptions may be appropriate when a more damaging impact from an alternative approach can be avoided or mitigated. For example, a carefully placed on-site wind turbine would minimize and might even eliminate the need for building roads and transmission lines into a service facility in a park.

Sincerely yours,  
*Charles Price* SB  
Charles Price

Sherman Bamford  
Virginia Forest Watch  
P.O. Box 3102  
Roanoke, Va. 24015-1102  
(540) 343-6359\*  
[bamford2@verizon.net](mailto:bamford2@verizon.net)

\*If you have any questions about this letter

Aug. 8, '08

George Washington Plan Revision  
George Washington & Jefferson National Forests  
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[comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)

To Maureen Hyzer, Forest Supervisor, and Planning Staff:

The following are comments on proposed Comprehensive Evaluation Report (CER), Draft Plan, and other issues and analysis related to the George Washington National Forest (GWNF) plan revision and the process for the GWNF Plan Revision. These comments are submitted on behalf of Virginia Forest Watch.

VAFW supports and incorporates herein by reference the comments of the Southern Environmental Law Center, The Wilderness Society and others, with the exception of the wind energy position. Global climate change is a significant and potentially life-altering phenomenon for all forms of life. Rising temperatures are implicated in rising sea levels, rapid changes in habitat and potential worldwide extinctions of flora and fauna. At the same time, accelerating destruction of wildlife habitat is also a global crisis.

It is therefore imperative that global climate change be addressed in ways that do not further eliminate or reduce wildlife habitat.

In particular, Virginia Forest Watch opposes the current trend in industrial-scale wind turbine development on public lands, like the GWNF. We request that the FS oppose industrial scale wind factories on national forest ridges given the numerous environmental disturbances including habitat destruction, forest fragmentation, bird and bat fatalities, and lack of scientific data on impacts to wildlife.

The development of wind factory sites, transmission-line corridors, and very wide access roads result in the loss, degradation, and fragmentation of forest habitat; erosion and sedimentation of streams; continuing, long-term wildlife fatalities and injuries; noise and light pollution for large swaths of surrounding areas; and permanent net-loss to forested carbon storage.

The Appalachian Mountains in Virginia are well documented as having many globally unique, rare, threatened or endangered plant and animal species and communities, for which public lands are becoming the last refuge from human development. The development of ridge-top forest habitats will prevent species from moving to higher elevations in response to global warming, which leaves them no alternative except extinction. In addition to environmental concerns, Virginia Forest Watch objects to exploitation of public lands for private profit.

Sincerely yours,



Sherman Bamford

Public Lands Coordinator, Virginia Forest Watch



**Lynn Cameron**  
<camerosl@jmu.edu>

08/08/2008 11:07 AM

To: comments-southern-georgewashington-jefferson@fs.fed.us  
cc: Pat Churchman <patchu2@verizon.net>  
Subject: Forest Plan Revision comments

Dear Planning Team,

Please accept the attached comments on the revision of the George Washington National Forest Plan. These are from Restoring Creation House Church, a group of about 15 Trinity Presbyterian Church members, with a mission to protect and restore the environment.

Thank you.

Lynn

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

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



RestoringCreationGWletter.doc





# Restoring Creation House Church

Trinity Presbyterian Church Phone: (540) 434-9556

725 South High Street  
Harrisonburg, VA 22801

Fax: (540) 434-1105

August 8, 2008

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

Dear Planning Team:

Trinity Presbyterian Restoring Creation House Church, based in Harrisonburg, is a group whose mission is to protect God's creation and foster a love of nature in our church and community. We have been following the revision of the George Washington National Forest Plan and would like to submit some comments for your consideration.

"The earth is the Lord's and all the fullness therein." Psalm 24:1 We would like to see some additional areas designated as Wilderness where natural forces of change can take place. Currently there is very little Wilderness here in the Shenandoah Valley area. We have taken children from Trinity Presbyterian Church to Ramseys Draft Wilderness and were pleased to be able to show them the glory of God's creation there. They enjoyed turning over rocks in the stream and seeing toad eggs and salamanders. We ate our lunch as we sat by the beautiful stream. These are the times and places that make lasting memories that can help children develop a love of nature. We think some good candidates for Wilderness would be:

**Skidmore Fork** – This is a beautiful area with old growth forest, an abundance of salamanders, and a crystal clear stream that helps supply pure water for the City of Harrisonburg.

**Little River** – This unspoiled watershed offers a wonderful opportunity to enjoy the beauty and fullness of God's creation close to Harrisonburg. There aren't many watersheds like this one without a road along them. We like this area because it is so large and wild and because it is surrounded by a large expanse of forestland. Two of our members have been responsible for maintaining a trail in the Little River area. On several occasions, our house church and youth from Trinity have devoted a full day to working on this trail. Some of the youth learned to dig and saw for the first time. What a great experience!

**Ramseys Draft Addition** – We would like to see Ramseys Draft Wilderness expanded. We took our youth on a backpacking trip upstream from Braley Pond before they were confirmed. The trip was very meaningful to them; it's been 10 years and they still talk about it when they come back to Trinity. We would like to see the whole area east, west and north of Ramseys Draft added to the Wilderness.

**Laurel Fork** – Our house church has met and worshipped near the beaver ponds on Buck Run. We think this is one of the most special places in Virginia. It is so unique and beautiful with the beaver ponds and spruce forest. The son of one of our members told his parents he would be engaged to marry along Laurel Fork. He chose this location to make the announcement because it is such a special place. On a recent backpacking trip down to Laurel Fork, two of our members were delighted by fresh beaver activity, salamanders scurrying every direction, and numerous songbirds, including hermit thrush, scarlet tanager, indigo bunting, and cedar waxwing. What a rich abundance of wildlife! This area should be at the top of the list for Wilderness designation.

Some areas are very special, but are not really fully suitable to be designated as Wilderness. Perhaps National Scenic Area status would serve to protect them. Here are some areas we would like to see protected in this way:

**Shenandoah Mountain from Rt. 250 to 33** – This area is probably one of the most unique and special places in Virginia because it is such a large tract of relatively undisturbed forest. We feel blessed to live close to this wonderful area. We enjoy picnicking in Hone Quarry, where we recently took communion, and going to Reddish Knob for the panoramic view and the sunset. Some of our members have been going to this popular mountaintop for more than 50 years. We would like to see this whole area protected from logging, additional roadbuilding, gas and mineral development, and wind development. We look forward to having this unique area available for our Church youth and families to be able to enjoy and share with their children. We think this area would make an ideal National Scenic Area with some of the core areas within designated as Wilderness.

**Kelley Mountain** - This beautiful area is adjacent to St. Marys Wilderness, but it's very popular with mountain bikers. For this reason, there would probably be a great deal of opposition for Wilderness designation. Perhaps Scenic Area status would protect the area, while still allowing mountain bikers to enjoy riding there.

**Southern Massanutten** – This area offers beautiful streams and many recreational opportunities. Its close proximity to Harrisonburg makes it an ideal place to go for a half day experience in the National Forest.

In addition to the Wilderness areas and Scenic areas that we have recommended, we would like to see all the *Virginia's Mountain Treasures* protected from logging, roadbuilding, gas and mineral development, and wind development. Our house church has played an active role in the development and promotion of *Virginia's Mountain Treasures*.

We appreciate the trails that the National Forest provides and use them as much as we can. Some of our members are getting older now, though, and we wish there were more short loop trails. Also, short loop trails would provide wonderful opportunities for our younger children. One of our goals is to help our children develop a love of nature. Short trails would offer real benefits to many forest users.

We are concerned about recent reports in the media that wind turbines have been proposed along Shenandoah Mountain and vicinity in Rockingham and Shenandoah counties. Although we support wind energy in general as a clean alternative, we do not support it in ecologically sensitive areas that are also prime

recreation areas for the public. The proposed sites would obliterate trails and would involve extensive clearing and excavation for wind turbine foundations and access/maintenance roads. We are opposed to industrial wind development on National Forest land. Having said this, we devote ourselves to promoting conservation and energy efficiency in our homes, churches, and neighborhoods. We are also actively requesting legislation to establish Virginia tax incentives for residential wind and solar installations. We are not naïve about our nation's need for energy and the need to move away from oil, but we think the costs would far outweigh the benefits of developing the ridgelines on National Forest land in western Virginia. Perhaps offshore sites would offer more reliable wind and fewer ecological and social impacts.

One value that is among the highest that the National Forest can provide is protection of water quality. We hope that the new plan will provide protection of the water supplies for the communities of the Shenandoah Valley. This is indeed serving the public good.

We thank you for the opportunity to comment.

Sincerely,

Lynn Cameron  
Mission Co-Leader  
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<lneale@rockbridge.net>

08/08/2008 11:24 AM

To: <comments-southern-georgewashington-jefferson@fs.fed.us>  
CC:  
Subject: GW Revision Comments

Please find my comments attached, Thank you , Laura Neale



080708GWCommentsLN.doc



Laura Neale  
423 Sheep Creek Lane  
Fairfield VA 24435  
August 8, 2008

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

Dear Ms. Hyzer,

Please accept a few comments I am submitting about the next George Washington National Forest Plan. I have a number of concerns, but overall wish to say that it seems to me that given the increasing pressure on all of our public lands due to the many forces created by a growing population, the management of the national forest needs to, with deliberation, grow into its future role as a repository of natural resources and natural cycles. Our country may look to these protected areas someday for insights into natural phenomena in ways in which we cannot now understand. National Forest leadership involved in plan revision can fulfill its mandate of multiple uses and protect this resource simultaneously by incorporating protection-based vision into all of its recommendations.

Please protect all roadless areas as they are by adhering to the 2001 Roadless Rule, and add all roadless areas that meet these criteria into the roadless inventory. If there is a “close” call, always bias towards protection.

Do not build any more roads. Forest fragmentation’s negative impacts on forest dependent wildlife are well documented. Consider closing system roads which see low to nonexistent public use, and restoring lands to pre road status.

Oppose all industrial wind on national forest lands. It is NOT an appropriate use of Southern Appalachian ridges for numerous reasons – incontrovertible is the destruction of ridge top habitat. Many additional negative impacts include destruction to flying fauna – definitive bat mortality data, “hidden” (unavailable to scientists) Neotropical migratory bird fatality data, and definitive raptor fatality, and forest fragmentation re construction of roads to reach ridges.

Protection of watersheds is more important than ever as communities surrounding our forests continue to grow, and will become ever more dependent on the natural water purifying capabilities of forestlands.

Please recommend that ALL areas recommended by the Virginia Division of Natural Heritage be designated as Special Biological Areas. It would seem to me that if naturalists – botanists, zoologists, SCIENTISTS who work for the state of Virginia take the time to inventory National Forest lands that their efforts be respected by the US

Government. Thousands of acres recommended by the DNH have been denied this special status. My belief is that areas need to be recognized as SBA's no matter what management designation may be or will be in place that may offer some form of protections. Also, existence of an SBA that protects a certain rare plant community or one rare plant or one rare bacterium or whatever does NOT preclude designation of similar areas. There is no such thing as exact duplication of a selected land's attributes. Also, if an area has been selected by the DNH and most of the land is owned privately, but a portion of it is on the National Forest, it would seem to give greater cause for that public land to be given SBA status. All Va DNH lands need to be recommended as Special Biological Areas.

Protect and preserve all mature forest AND all old growth forest for the many flora and fauna dependent upon this habitat. Let naturally occurring forces create the light gaps required for the early successional growth required for certain species and life stages of other species. Let trees fall and rot and contribute life-giving substrate for bacteria and fungi, and let the life forces fully cycle. The National Forest is an island amidst a sea of habitat fragmentation, destruction and introduction of non-native crops and invasives.

Create forest wide invasive plant suppression/eradication strategies.

Protect all of the areas in the Virginia Mountain Treasures.

Recommend Wilderness designation for all of those areas recommended by the Virginia Wilderness Committee, and recommend National Scenic Areas for those areas recommended by the Virginia Wilderness Committee.

Respectfully,

Laura Neale



<Amy.Ewing@dgif.virginia.gov>

08/08/2008 12:30 PM

To: <comments-southern-georgewashington-jefferson@fs.fed.us>

cc: <Al.Bourgeois@dgif.virginia.gov>,  
<John.Kleopfer@dgif.virginia.gov>,  
<Rick.Reynolds@dgif.virginia.gov>,  
<Chris.Burkett@dgif.virginia.gov>

Subject: GW Plan Revision

We received notice of the availability of the most recent working copy of the Land Management Plan for the George Washington National Forest.

Staff from our Wildlife and Fisheries Divisions have participated in public scoping meetings and have provided comments to the Forest Service regarding this plan and other plans and programs associated with the National Forest. We recommend continued coordination with our agency including the Wildlife, Fisheries and Wildlife Diversity Divisions. We recommend consideration of all comments received to date from our agency including recommendations on forest management, wildlife habitat protection and management, consideration of state and national wildlife management plans and directives, and the protection of imperiled wildlife and their habitats (particularly state threatened wood turtle).

We would be happy to assist the Forest Service with such initiatives. Please feel free to contact us (see contact information below) for guidance or information. We recommend that future drafts of the land management plan or other documents in need of review be provided to our Environmental Services Section in our Richmond Office at 4010 West Broad Street, Richmond, VA 23230 as well as to our Region IV office at 517 Lee Highway, Verona, VA 24482.

Region IV office: 540-248-9360  
Wildlife Division: Al Bourgeois, Jay Jeffreys  
Fisheries: Larry Mohn  
Wildlife Diversity: Rick Reynolds

State Herpetologist (wood turtle): J.D. Kleopfer, 804-829-6703

Wildlife Action Plan Coordinator: Chris Burkett, 804-367-9717

Thank you.

Amy M. Ewing  
Environmental Services Biologist  
Virginia Dept. of Game and Inland Fisheries  
4010 West Broad Street  
Richmond, VA 23230  
804-367-2211  
amy.ewing@dgif.virginia.gov



**"Ernie Reed"**  
<lec@wildvirginia.org>  
>

To: <comments-southern-georgewashington-jefferson@fs.fed.us>  
cc:  
Subject: Draft CER Comments

08/08/2008 01:30 PM

Dear Maureen, Dave, Ken and all,

Attached are comments sent on behalf of Wild Virginia. They are in addition to comments which we have filed jointly with SELC and other groups.

Enjoy!

Best,

Ernie Reed, Vice President, Wild Virginia



08 08 August 8 final cer comments wild va.doc





"JPL"  
<jplynch@crosslink.net>

To: <comments-southern-georgewashington-jefferson@fs.fed.us>  
cc: "JPL" <jplynch@crosslink.net>  
Subject: "Comment on George Washington Plan Revision"

08/08/2008 03:31 PM

Dear Sirs;

Please accept the following comments pertaining to the George Washington Forest Plan Revision.

1. I am concerned with the increasing use of OHVs in our national forests. I realize that citizens have a right to use them, but I believe that their use should be restricted to forest roads and other trails specifically built and maintained for their use. I also request that consideration of noise pollution be given to where and when OHVs are allowed to be used.
2. The roadless areas in the forest that are not on the inventory of roadless areas need to be added.
3. I request that no industrial wind turbine facilities be approved at this time. The technology is too much in its infancy, there are large scale wind facilities being proposed in areas of the US that are more conducive to such use (e.g. the Great Plains), and the ridge tops of the Blue Ridge and Appalachian Mountains are just to great a resource to risk.
4. Water quality is mentioned in the plan for both surface and ground water (aquifers). I would like to see more done with monitoring the quality of water that flows out of the forest. Both surface and ground water. As you know, one of the most important reasons for having our national forests is for protection of water supply.

Thank you.

James P. Lynch  
8263 Oakwood Drive  
King George, VA 22485

540-775-7002  
[jplynch@crosslink.net](mailto:jplynch@crosslink.net)

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Jim Lynch



**Peter Paul van Dijk**  
<[p.vandijk@conservation.org](mailto:p.vandijk@conservation.org)>

08/08/2008 04:16 PM

To: <[comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)>  
cc: Anders Rhodin <[RhodinCRF@aol.com](mailto:RhodinCRF@aol.com)>, Michael Smith  
<[m.smith@conservation.org](mailto:m.smith@conservation.org)>, Don Church  
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<[loki4@rica.net](mailto:loki4@rica.net)>, Lisa Handy <[l.handy@conservation.org](mailto:l.handy@conservation.org)>  
Subject: GW Plan Revision - perspective on Wood Turtles

Dear Supervisor Hyzer and Colleagues,

It is my pleasure to submit the attached comments on the Comprehensive Evaluation Report for the George Washington Plan Revision, George Washington & Jefferson National Forests.

Yours sincerely,  
Peter Paul van Dijk

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Peter Paul van Dijk, Ph.D.  
Director, Tortoise and Freshwater Turtle Conservation Program  
Center for Applied Biodiversity Science (CABS),  
Conservation International  
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email <[p.vandijk@conservation.org](mailto:p.vandijk@conservation.org)>, phone (+1) 703.341.2679, fax (+1) 703.979.2873  
[www.conservation.org](http://www.conservation.org) - [www.biodiversityscience.org](http://www.biodiversityscience.org) - [www.biodiversityhotspots.org](http://www.biodiversityhotspots.org)



GW\_Plan\_Revision\_PPvD\_Comments\_080807.pdf





CONSERVATION  
INTERNATIONAL

George Washington National Forest - Supervisor's Office  
5162 Valleypointe Pkwy.  
Roanoke, VA 24019  
888-265-0019  
540-265-5173  
[comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)

Arlington, VA  
August 8, 2008

to: Supervisor Maureen Hyzer, Officers Kenneth Landgraf, JoBeth Brown, Dave Plunket,  
and other concerned officers  
regarding: Comments pertaining to the Comprehensive Evaluation Report (CER) for the  
George Washington Plan Revision, George Washington & Jefferson National Forests

Dear Supervisor Hyzer and Colleagues,

I read with interest the notice <<http://edocket.access.gpo.gov/2008/E8-14292.htm>> on  
resumption of planning for the GWNF and Jefferson NF management plans, and  
associated documents at the Forest Service website, at  
<<http://www.fs.fed.us/r8/gwj/forestplan/revision/index.shtml>>

I note particularly your view that changes to the 1993 Plan are warranted, and  
wholeheartedly support the proposed action to support option C1, designating 83 new and  
13 expanded Special Biological Areas (Draft CER, page 60). I also note that the draft  
CER (page 58) notes the Wood Turtle's listing as a Virginia State threatened species, and  
that the habitat management strategy for this species will inform the GW-JNF Planning  
process.

The significance of the Wood Turtle, particularly its populations in the GWNF, is  
considerable. Across its range, the species' conservation status is cause for significant  
concern, being under a variety of impacts ranging from habitat loss and illegal collection  
to accidental mortality on roads and trails and in agricultural areas adjoining forest.  
Moreover, the GWNF hosts the southernmost viable population of this species, a relictual  
occurrence from a more southerly distribution during glaciation periods (Amato *et al.*,  
2008). At a time when local effects of global warming are becoming quite apparent, this  
urges particular care for this population, in the form of maximally safeguarding its habitat  
from thermal and hydrological extremes.





I note that the Special Areas map shows one proposed SBA located in the headwaters above a wood turtle population, which may benefit this species. However, based on published and unpublished information shared by colleagues, there exist 8 streams in the northern GWNF that contain wood turtle populations; none of these appears to be proposed as SBAs. I encourage you to carefully consider the merit and feasibility of extending SBA recognition and protection to these Wood Turtle sites, preferably as integrated interconnected clusters of SBAs to reflect the movement patterns of this species. Should this prove not feasible at this moment in time, I urge you to at least address the conservation needs of this sensitive species by means of appropriate restrictions on extraction, recreation and other impacts in and above all habitat areas still inhabited by this species. The Wood Turtle needs and deserves all the help it can get.

I commend you for the care and attention you provide for planning the future management of this magnificent forest, and encourage you to weigh its irreplaceable natural heritage features heavier than destructive exploitative pressures that can be absorbed in other locations.

Yours sincerely,

Peter Paul van Dijk, Ph.D.  
Director, Tortoise & Freshwater Turtle Conservation Program  
Center for Applied Biodiversity Science at Conservation International  
[p.vandijk@conservation.org](mailto:p.vandijk@conservation.org) 703 341 2679



"Sarah Francisco"  
<sfrancisco@selcva.org>

To: <comments-southern-georgewashington-jefferson@fs.fed.us>  
cc: "Sarah Francisco" <sfrancisco@selcva.org>  
Subject: GW Plan Revision

08/08/2008 05:15 PM

Please find attached an electronic copy of the comments of the Southern Environmental Law Center, The Wilderness Society, the Southern Appalachian Forest Coalition, the Virginia Wilderness Committee and Wild Virginia on the George Washington National Forest plan revision. Please let me know if you have any questions or difficulty with the attachment. A complete hard copy (with supporting documents) also was sent today by U.S. mail.

Thank you.

Sarah A. Francisco  
Staff Attorney  
Southern Environmental Law Center  
201 West Main Street, Suite 14  
Charlottesville, VA 22902  
(434) 977-4090  
(434) 977-1483 (fax)  
SouthernEnvironment.org

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Comments on GW Plan Revision Aug 8 2008.pdf



## LIST OF ATTACHMENTS

Comments of the Southern Environmental Law Center, The Wilderness Society, the Southern Appalachian Forest Coalition, the Virginia Wilderness Committee and Wild Virginia re: George Washington National Forest Plan Revision – Need for Change and Draft Comprehensive Evaluation Report, submitted August 8, 2008  
(attachments submitted on enclosed CD-ROM and incorporated in comments by reference)

1. Mark Miller for The Wilderness Society, Virginia's Mountain Treasures: The Unprotected Wildlands of the George Washington National Forest. A report by the Wilderness Society (Hard copy only).
2. Petition of the Governor of Virginia to the U.S. Secretary of Agriculture for Protection of National Forest System Inventoried Roadless Areas in the Commonwealth of Virginia. (Pursuant to 36 C.F.R. §§ 294.10-294.18, effective 5/13/05.) Submitted by Mark Warner, Governor of the Commonwealth of Virginia, December 22, 2005.
3. Ben Beach, Bart Koehler, Leslie Jones, and Jay Watson (eds.) The Wilderness Society, "The Wilderness Act Handbook," Chapter 3: Designating New Wilderness Areas, April 2004. (Hard copy of relevant excerpts included.)
4. Doug Scott, Campaign for America's Wilderness, "Solitude, 'Sights & Sounds' and The Wilderness Act: What Can Qualify for Designation as Wilderness?" (April 2003)
5. USDA Forest Service, Recreation Opportunity Spectrum User's Guide (ca. 1982) (relevant excerpt only).
6. Jefferson National Forest Process Paper, Recreation Opportunity Spectrum (ROS) (undated).
7. H. Ken Cordell and Christine Overdevest, Principal Authors, "Footprints on the Land: An Assessment of Demographic Trends and the Future of Natural Resources in the United States," (methods of analysis and "hotspot" maps for forests, public lands and Wilderness only) (Hard copy included).
8. Roger B. Hammer and Volker C. Radeloff, SILVIS Lab, Dept. of Forest and Wildlife Ecology, Univ. of Wisconsin, Madison, and USDA Forest Service Northern Research Station, Maps of Virginia Housing Density Change 1940 - 2030. (Hard copy included.)
9. Gregory H. Aplet, The Wilderness Society, et al., "Wilderness Attributes and the State of the National Wilderness Preservation System" in H. Ken Cordell, John C.

Bergstrom, and J.M. Bowker, The Multiple Values of Wilderness, (2005) , pp. 91-111; Plate 14. (Hard copy included.)

10. Randall S. Rosenberger & Donald B.K., English, "Impacts of Wilderness on Local Economic Development," in H. Ken Cordell, John C. Bergstrom, and J.M. Bowker, The Multiple Values of Wilderness, pp. 181 – 204 (2005) (Hard copy included).
11. Letter from Steven Krichbaum, Wild Virginia, to Bill Damon, Forest Supervisor, George Washington-Jefferson National Forest, Re: Plan Amendment for Paddy/Cove Runs Special Interest Areas – Biologic (March 16, 2004).
12. Letter from Steven Krichbaum, Wild Virginia, to Bill Damon, Forest Supervisor, George Washington-Jefferson National Forest, Re: Plan Amendment for Paddy/Cove Runs Special Interest Areas – Biologic: Forest Service Response (May 21, 2004).
13. Letter from Larry Smith, Natural Area Protection Manager, Virginia Department of Conservation and Recreation, to Bill Damon, Forest Supervisor, George Washington-Jefferson National Forest (June 11, 2004).
14. Steven Krichbaum, Wild Virginia, Cove Run Special Biological Area: Site Report (September 2006).
15. Steven Krichbaum, Wild Virginia, Paddy Run Special Biological Area: Site Report (July 2005).
16. Wild Virginia to Maureen Hyzer, GW/JNF Forest Supervisor, re Paddy Run/Cove Run SBA (Oct. 9, 2006).
17. Map of Proposed Paddy Run Special Biological Area by Wild Virginia.
18. Map of Paddy Run Special Biological Area by Virginia Division of Natural Heritage.
19. Eastern Brook Trout Joint Venture, "Eastern Brook Trout: Status and Threats" report for Virginia (2006). (Hard copy included.)
20. Fred Huber, Dawn Kirk, & Mike Donahue, "Conservation and Management of Forest Riparian Habitat Associates" (August 28, 2001).
21. USFS, Draft Riparian Corridor Prescription (February 1, 2001).
22. Hugh Irwin, Susan Andrew & Trent Bouts, Southern Appalachian Forest Coalition, "Return the Great Forest: A Conservation Vision for the Southern Appalachian Region" (2002).

23. Quentin Bass, Forest Archeologist, Cherokee National Forest, "The Forest Ecosystem and the Effects of Land Use Patterns in the Southern Appalachian Physiographic Province, Inclusive of the Cherokee National Forest." (Hard copy included.)
24. H.B. Ayres & W.W. Ashe, "The Southern Appalachian Forests," U.S. Department of Interior, U.S. Geological Survey, Professional Paper No. 37, (1905) (a joint report of the DOI USGS, the Bureau of Forestry of the USDS, and the Geological Survey of N.C. to the U.S. House of Representatives, 58<sup>th</sup> Congress, Doc. No. 409) (relevant excerpts only).
25. W.W. Ashe, "Reserved Areas of Principal Forest Types As a Guide In Developing An American Silviculture." Journal of Forestry.
26. Jason A. Lynch and James S. Clark, "Fire and vegetation histories in the southern Appalachian Mountains: The historical importance of fire before and after European/American settlement, A report submitted to the George Washington & Jefferson National Forest" (April 20, 2002).
27. William A. Patterson III and Andrea Stevens, "The History of Fire and Vegetation in the Appalachian Mountain Region of Virginia: A Piece in the Puzzle We Call Ecosystem Management, A Report Submitted to the George Washington National Forest" (September 1995).
28. USDA Forest Service, Briefing Paper, "Summary of conclusions from Historical Ecology and Climate Change Workshop" (April 28, 2008).
29. Excerpts from Donald Edward Davis, Where There Are Mountains: An Environmental History of the Southern Appalachians (2000).
30. Charles W. Lafon & Henri D. Grissino-Mayer, "Fire Regimes and Successional Dynamics of Yellow Pine (Pinus) Stands in the Central Appalachian Mountains: Final Report to Joint Fire Science Program," Project Number 01C-3-3-09 (November 2005).
31. Excerpts from Susan Herrod Julius & Jordan M. West (eds.); Linda A. Joyce, U.S.D.A. Forest Service (Lead Author, National Forest System) "Preliminary review of adaptation options for climate-sensitive ecosystems and resources: Final Report, Synthesis and Assessment Product 4.4" Report by the U.S. Climate Change Science Program And the Subcommittee on Global Change Research (June 2008) (Introduction & Executive Summary). (Hard copy included.).
32. Excerpts from Susan Herrod Julius & Jordan M. West (eds.); Linda A. Joyce, U.S.D.A. Forest Service (Lead Author, National Forest System) "Preliminary review of adaptation options for climate-sensitive ecosystems and resources: Final Report, Synthesis and Assessment Product 4.4" Report by the U.S. Climate

Change Science Program And the Subcommittee on Global Change Research (June 2008) (Summary of Chapter on National Forest System). (Hard copy included.)

33. Excerpts from Thomas R. Karl, Gerald A. Meehl, Christopher D. Miller, Susan J. Hassol, Anne M. Waple, and William L. Murray, (eds.). "Weather and Climate Extremes in a Changing Climate; Regions of Focus: North America, Hawaii, Caribbean, and U.S. Pacific Island." Synthesis and Assessment Product 3.3: Report by the U.S. Climate Change Science Program and the Subcommittee on Global Change Research (June 2008) (Introduction & Executive Summary only). (Hard copy included.)
34. Lara Hansen and Jennifer Biringer, World Wildlife Fund, "Buying Time: A User's Manual for Building Resistance and Resilience to Climate Change in Natural Systems" (September 2003) (Publication overview only) (Hard copy included.).
35. Society for Ecological Restoration International ("SER"), Science & Policy Working Group, The SER International Primer on Ecological Restoration, available at [www.ser.org/pdf/primer3.pdf](http://www.ser.org/pdf/primer3.pdf) (2004);
36. Andre Clewell et al., SER, Guidelines for Developing and Managing Ecological Restoration Projects, available at [www.ser.org/pdf/SER\\_International\\_Guidelines.pdf](http://www.ser.org/pdf/SER_International_Guidelines.pdf) (Dec. 2005).
37. Dominick DellaSala et al., A Citizen's Call For Ecological Forest Restoration: Forest Restoration Principles And Criteria, Ecological Restoration 21:1 (March 2003).
38. USFS Southern Region, Southern Appalachian Ecosystem Restoration Focus Areas (Feb. 2008) (Hard copy included).
39. Hermann Gucinski et al. eds., USDA-FS, Pacific Northwest Research Station, Forest Roads: A Synthesis of Scientific Information, General Technical Report; PNW-GTR-509.
40. Letter from Thomas A. Chapman, U.S. Fish and Wildlife Service, to Ms. Wendy Tidhar, WEST, Inc., Re: Proposed Construction and Operation of a Wind Power Facility, in Pendleton and Hardy Counties, West Virginia (November 16, 2007).
41. Letter from David W. Carr, Jr. and Sarah A. Francisco, Southern Environmental Law Center, to Linda Brett, Acting Supervisor, George Washington and Jefferson National Forest, Re: Wind Turbine Proposal for Church Mountain, George Washington National Forest (May 13, 2008).

42. SELC Comments on the Forest Service Proposed Rule on National Forest Planning: 67 Fed. Reg. 72770 (Apr. 7, 2003).
43. SELC Comment on NEPA Documentation Needed for Developing, Revising or Amending Land Management Plans: Categorical Exclusion, 70 Fed. Reg. 1062 (Jan. 5, 2005) (Mar. 7, 2005).
44. SELC Comment on Proposed National Forest System Land Management Planning Directives (June 21, 2005).
45. SELC Comments on Notice of Intent to Prepare an Environmental Impact Statement for the 2005 National Forest System Land Management Planning Rule (June 11, 2007) (on behalf of SELC, Cherokee Forest Voices, Georgia ForestWatch, Heartwood, SABP, Virginia ForestWatch, Western North Carolina Alliance, and Wild Virginia).
46. Comments on Draft Environmental Impact Statement for the 2005 National Forest System Land Management Planning Rule (Oct. 22, 2007) (on behalf of SELC, the Clinch Coalition, Georgia ForestWatch, SABP, Virginia ForestWatch, Western North Carolina Alliance and Wild Virginia).
47. Karen L. Mayne, U.S. FWS, to Robert T. Jacobs, Regional Forester, Re: 2003 Revised Jefferson National Forest Land and Resource Management Plan, Virginia, West Virginia, Kentucky, (January 13, 2004) (transmitting biological opinion).



**Steve Krichbaum**  
<loki4@rica.net>

08/08/2008 09:35 PM

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

please see attached word document



DCER comments 2008 SK





"JPL"  
<jplynch@crosslink.net>

08/08/2008 11:02 PM

To: "JPL" <jplynch@crosslink.net>, <comments-southern-georgewashington-jefferson@fs.fed.us>  
cc:  
Subject: Re: "Comment on George Washington Plan Revision"

I would like to add one more comment. There has been a lot of news this week about drug cartels growing marijuana in national forests. Planning should consider ways to nip this in the bud, as well as all other illegal activities that take advantage of our forest resources.

---

Jim Lynch

----- Original Message -----

**From:** [JPL](mailto:jplynch@crosslink.net)

**To:** [comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)

**Cc:** [JPL](mailto:jplynch@crosslink.net)

**Sent:** Friday, August 08, 2008 3:31 PM

**Subject:** "Comment on George Washington Plan Revision"

Dear Sirs;

Please accept the following comments pertaining to the George Washington Forest Plan Revision.

1. I am concerned with the increasing use of OHVs in our national forests. I realize that citizens have a right to use them, but I believe that their use should be restricted to forest roads and other trails specifically built and maintained for their use. I also request that consideration of noise pollution be given to where and when OHVs are allowed to be used.
2. The roadless areas in the forest that are not on the inventory of roadless areas need to be added.
3. I request that no industrial wind turbine facilities be approved at this time. The technology is too much in its infancy, there are large scale wind facilities being proposed in areas of the US that are more conducive to such use (e.g. the Great Plains), and the ridge tops of the Blue Ridge and Appalachian Mountains are just too great a resource to risk.
4. Water quality is mentioned in the plan for both surface and ground water (aquifers). I would like to see more done with monitoring the quality of water that flows out of the forest. Both surface and ground water. As you know, one of the most important reasons for having our national forests is for protection of water supply.

Thank you.

James P. Lynch  
8263 Oakwood Drive  
King George, VA 22485

540-775-7002  
[jplynch@crosslink.net](mailto:jplynch@crosslink.net)

---

Jim Lynch



**Sherman Bamford**  
<bamford2@verizon.net>

08/08/2008 11:38 PM

To: comments-southern-georgewashington-jefferson@fs.fed.us  
cc: Sherman Bamford <bamford2@verizon.net>  
Subject: GWNF Plan Revision comments 2

Sherman Bamford  
Virginia Forest Watch  
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(540) 343-6359\*  
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\*If you have any questions about this letter

Aug. 8, '08

George Washington Plan Revision□  
George Washington & Jefferson National Forests□  
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To Maureen Hyzer, Forest Supervisor, and Planning Staff:  
The following are comments on proposed Comprehensive Evaluation Report (CER), Draft Plan, and other issues and analysis related to the George Washington National Forest (GWNF) plan revision and the process for the GWNF Plan Revision. These comments are submitted on behalf of Virginia Forest Watch and Virginia Chapter-Sierra Club.

**CER:**

The CER makes numerous assertions and statements without explaining what references support these claims. The reference list(s) are inadequate. We cannot evaluate or make comments on the CER and Draft Plan until we are provided with these references. Up to date science is not incorporated into this document. The FS has not taken the "hard look" at issues as required by NEPA. An interdisciplinary approach is not taken. This is arbitrary and capricious and in violation of the APA, NEPA, and NFMA. We would be happy to comment further once we are provided with citations for all unreferenced claims made in the CER.

For example, including, but not limited to p. 35 para. 3 sentence 2; p. 50 para. 1 sentence 13&14; p. 50 para. 2 sentence 12; p. 47 para. 1 sentence 2; p. 47 para. 1 sentence 4; p. 63 para 3 all; p. 64 para 4 sentence 1; p. 64 para 5, sentence 3; p. 65 para 1 sentence 1; p. 67 para 2, sentence 1;





**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

203 Governor Street  
Richmond, Virginia 23219-2010  
(804) 786-6124  
August 8, 2008

Ms. Maureen Hyzer  
Forest Supervisor  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway,  
Roanoke, Virginia 24019-3050

Re: George Washington Plan Revision

Dear Supervisor Hyzer:

The Natural Heritage Program of the Department of Conservation and Recreation places great value on our working relationship with USFS staff in Virginia and we appreciate the opportunity to provide further comment on the ongoing George Washington land management planning. We have reviewed the Draft Comprehensive Evaluation Report (CER) and the initial working copy version 1 of the Proposed George Washington Revised Land Management Plan and offer these comments on key strategies that the Forest Service could pursue to identify and manage the outstanding natural heritage resources and biological diversity that exists on the GWNF. These comments are prepared in response to a review of the initial working copy version 1 of the Proposed George Washington Revised Land Management Plan but are relevant also to material presented in the draft CER. Also presented here is a very brief overview of the Virginia Natural Landscape Assessment which we recently developed, which we believe is a very relevant conservation planning tool to assist your forest planning efforts.

Chapter 1: Forest-wide Desired Conditions by Resource Areas

Rare Communities - Much more information should be presented here. The occurrences of both rare natural community types on the GWNF as well as the exemplary occurrences of more common types should be presented in the final land management plan. There are numerous occurrences of rare natural communities and exemplary occurrences of common natural communities of Virginia on the GWNF. A list of the natural heritage resources, including the rare and exemplary natural community occurrences, known to occur on GWNF lands is attached. The desired future condition that the "rare ecological communities are sustained" is laudable, but not clear as a stated intent or course of action.

Wildlife and Fish Habitat, Threatened and Endangered Species Habitat, Species of Concern Habitat, and Species of Interest Habitat – A list of species that are of concern to the GWNF should be presented in the plan. For what species does this desired future condition apply? The Forest Service should give consideration to all species listed as endangered or threatened, or are monitored, or considered of special concern by the Virginia Department of Game and Inland Fisheries and the Natural Heritage Program of the Department of Conservation and Recreation. The GWNF land management plan should contribute to the species conservation and recovery goals of the Virginia Wildlife Action Plan and the Virginia Natural

Heritage Plan. There is a conspicuous absence of a commitment to manage, conserve and recover state endangered and threatened species and globally rare species which should be a stated commitment in the next iteration of the draft management plan.

There is a statement that should be explained regarding desired non-native species on the Forest. Which non-native species are desirable and why are they favored over native species?

Recreation – Developed and Disbursed – Include within this desired future conditions the statement that recreational uses do not occur unmanaged in sensitive habitats and within special areas on the GWNF and control and enforcement actions will be pursued to protect these areas from those activities.

Vegetation, Old-Growth and Forest Health – We applaud your desired condition for a well-distributed and representative network of old growth forest. To achieve that, we urge that the final plan present your identified network of old-growth forest areas, their geographic distribution and how well this network represents the natural forest types that occur on the GWNF.

Partnerships – Much more discussion will be needed here. The GWNF is a major landowner/manager in Virginia and the extensive land base supports numerous opportunities for natural resource based recreation, conservation and other activities. As such, the GWNF should be a partner assisting with the accomplishment of numerous local, regional, state and recreation and conservation national plans. It is advised that the role of the Forest Service as a partner in the most prominent of those plans be discussed in the final land management plan.

Botanical – Zoological Areas – Through the work of Virginia Natural Heritage program scientists and our partners about 110 natural heritage conservation sites have been identified on the GWNF. Information on these sites and their boundaries has been shared with the Forest Service through a series of natural heritage technical reports and staff meetings. These sites were most recently presented to the Forest Service in 2005 in support of their designation as Special Biological Areas or other special area designations. A list of those conservation sites is attached. New natural heritage conservation sites can be identified at any time. The information on natural heritage conservation sites and their boundaries is also subject to frequent change. For these reasons, it is advised that the next forest management plan be flexible to allow designation of new special biological areas during the course of implementation of the management plan and to allow adjustment of SBA boundaries to reflect our most current knowledge of the sites.

On the subject of Special Biological Areas are two issues that warrant additional discussion. One is the series of natural sinkhole ponds that occur along Coal Road. These ponds on the GWNF are part of a larger series of natural sinkhole ponds that occur in parts of adjoining Augusta County and Rockingham County. The ponds are quite limited in number and are mostly in private ownership. The ponds occur in landscape that is very fragmented by land ownership and land use and are extremely threatened due to the lack of legal protection and their inherent vulnerability. The ponds and the species that are dependent upon the ponds are quite sensitive to disturbance from motorized vehicles, draining, filling, fragmentation and other threats.

Because of the high number of rare species and rare natural communities that occur at these ponds and the diversity and quality of ponds along Coal Road on the GWNF, several SBAs have been recognized. The draft CER recognized three existing SBAs, with proposed boundary expansions, a newly proposed SBA along the Coal Road corridor. However two additional natural heritage conservation sites located along Coal Road between Maple Flats and Grassy Pond have been nominated for SBA designation by DCR. These conservation sites are not listed as new SBAs in the draft CER. Serious consideration should be given to designate the Shenandoah Acres conservation site (423 acres) and Falling Rock Creek

conservation site (305 acres) (see attached map) as new SBAs. These conservation sites and all forest service land between the existing and proposed SBAs here should be considered for classification under a single management designation and be managed under a uniform and biologically compatible regime. The biological significance of this area and the opportunity we currently have through this planning process to designate protected corridors between the series of ponds, riparian areas and upland hardwoods should cause us to reconsider the General Forest land classification for the Coal Road corridor. The General Forest classification would allow future outcomes such as land sales to occur here that would be detrimental to this natural system of ponds and the species that move between the ponds. This is the only opportunity remaining in Virginia to manage a large association of sinkhole ponds and adjoining upland habitat and to protect this significant component of Virginia's natural heritage.

A second issue related to appropriate and compatible management of the special biological diversity on the GWNF is the management of wood turtle habitat. We have proposed two SBAs for wood turtle habitat on the GWNF, Paddy Run and Sours Run. Neither site has been recommended for that special designation. Management of lands that support wood turtle habitat but designated for some other primary use creates the situation where wood turtles are managed as a secondary or tertiary resource. This is likely to lead to degradation of habitat quality and connectivity. We recommend that greater consideration be made to manage and recover state listed species and globally rare species such as the wood turtle in the final forest management plan. We would be glad to discuss with forest service staff and staff of the Department of Game and Inland Fisheries how that can be accomplished.

## Chapter 2: Strategy

Land Ownership and Special Uses - The proposed revised land management plan allows uses within SBAs which are not compatible with biological diversity protection. For example, it appears that salvage harvest, foot races and horseback endurance events are permitted with SBAs. Closer attention on what activities are appropriate and compatible with the biological protection goals within the SBAs will be needed in the final forest plan. We would be glad to work with you on that.

It is apparent that the proposed GWNF revised land management plan is a very preliminary document that has been distributed to present the format and general content of the final plan. Sections important to the DCR Division of Natural Heritage include threatened and endangered species habitat, rare communities, special areas and cave and karst lands. Our staff welcomes the opportunity to work with the Forest Service to identify the management issues within these broad natural resource topics for inclusion in the final plan.

### Virginia Natural Landscape Assessment

The Natural Heritage Program of the Department of Conservation and Recreation has developed a conservation planning tool that is very relevant to the land planning activities on the GWNF. We would be pleased to present this project to you. The result of this effort clearly identifies the state-wide significance of the natural lands on the GWNF. This project, the Virginia Natural Landscape Assessment (VaNLA, [http://www.dcr.virginia.gov/natural\\_heritage/vclnavnla.shtml](http://www.dcr.virginia.gov/natural_heritage/vclnavnla.shtml)), has identified and prioritized natural lands in Virginia and has identified corridors connecting the natural lands.

Using land cover data derived from satellite imagery, the VaNLA identified large patches of natural land with at least one hundred acres of interior cover which we call ecological core areas. Ecological cores are essential for sensitive species that are adversely affected by edge effects, such as brood parasitism by brown-headed cowbirds and excessive predation by edge-inhabiting predators that can inhibit their ability to survive and reproduce. In general, ecological cores that are large and deep provide the best insulation from edge effects. The ecological cores identified through this project were classified into five categories of ecological integrity: C1 – Outstanding; C2 – Very High; C3 – High; C4 – Moderate; and C5 – General.

The GWNF supports the most significant concentration of ecological cores in Virginia. The GWNF contains or intersects almost 30% (33 of 111) of Virginia's ecological cores ranked C1 for outstanding ecological integrity, representing 34.4% of the area (976,931 of 2,610,088 acres) of all C1 ecological cores in the state. Included in this assemblage is the largest C1 ecological core completely within Virginia, as well as 11 of the 21 largest C1 ecological cores in the state. Also included is the largest ecological core ranked C2 for very high ecological integrity and 9 of the 15 largest C2 ecological cores in Virginia. GWNF ecological cores contain two of the highest biodiversity ratings for non-riverine rare species in Virginia, exceeded only by an ecological core in Shenandoah National Park. Five GWNF ecological cores are among the six deepest in the state, meaning they have potential for exceptional interior cover. Also, the close proximity of most GWNF ecological cores to one another means they likely function in aggregate to provide habitat and to perform ecosystem services at the highest level. One of these ecosystem services, maintaining water quality, is prominent in GWNF ecological cores since they contain 13 of the 28 longest stretches of forest interior streams in Virginia.

The biodiversity potential, healthy wildlife populations and ecosystem services of large ecological cores make them the highest priority targets for conservation. USFS should strive to maintain the high natural integrity of ecological cores in order to retain these benefits not only for plant and animal populations they support, but also for the ecosystem services they provide.

I appreciate the opportunity to comment on your planning products to date. The Natural Heritage Program looks forward to a close working relationship and continued input as your efforts advance.

Sincerely,

Larry Smith  
DCR, Natural Area Protection Manager





**Sherman Bamford**  
<[bamford2@verizon.net](mailto:bamford2@verizon.net)>

08/09/2008 12:01 AM

To: [comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)  
cc: Sherman Bamford <[bamford2@verizon.net](mailto:bamford2@verizon.net)>  
Subject: GWNF Plan comments 3

Sherman Bamford  
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\*If you have any questions about this letter

Aug. 8, '08

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To Maureen Hyzer, Forest Supervisor, and Planning Staff:  
The following are comments on proposed Comprehensive Evaluation Report (CER), Draft Plan, and other issues and analysis related to the George Washington National Forest (GWNF) plan revision and the process for the GWNF Plan Revision. These comments are submitted on behalf of Virginia Forest Watch and Virginia Chapter-Sierra Club.

p. 70 para 1:

This is a good justification for scaling back OHV trails, esp. those where damage is occurring or maintenance costs are high.

p. 75, para 1: All roadless areas, including the remaining 11% of IRAs (and other areas that meet roadless criteria) should be formally protected in the new Plan Rev, consistent with the 2001 roadless rule.

p. 84, para. 3: When will the areas preliminarily identified as "potential wilderness" (roadless) be posted to the www? This information was to be posted about 15 months ago, and upon our last review of the GWJNFs website, we could find no listing or maps. We will comment on these areas once they are posted. All Virginia Mtn Treasure areas should be

considered for possible inclusion in the roadless inventory.

p. 86 para 6: the 1993 W&S survey was not comprehensive. Other waterways need to be examined.

p. 92 para 9: the FS should actively work with the state and USFWS to promote the reestablishment of all appropriate extirpated species.

p. 94 para 3: 16 acres out of 1.8 million acres of NF is totally inadequate and need to be increased.

Sherman Bamford  
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**"Kim Clanton"**  
<clanton1@mgwnet.com>

To: <comments-southern-georgewashington-jefferson@fs.fed.us>  
cc:  
Subject: Emailing: comments on plan revisionfor GWNF

08/09/2008 12:57 AM

Your message is ready to be sent with the following file or link attachments:  
comments on plan revisionfor GWNF

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



comments on plan revisionfor GWNF.doc



-George Washington National Forest Office of the Supervisor  
5162 Valleypointe Pkwy  
Roanoke, Va. 24019

From Shay and Kim and Kim Bass Clanton  
65 Clayton Mill Rd. Deerfield, Va 24432

Phone 540 939 4738

To Supervisor Maureen Hyzer, Kenneth Landgraf, Dave Plunket, and all  
concerned,

Thank you for this opportunity to comment on the revision of the George  
Washington National Forest Land and Resource Management Plan.  
Our land and home borders the George Washington National Forest at the base  
of Walker Mountain in the Deerfield area.

Our comments pertaining to the Draft Comprehensive Evaluation Report  
(CER) for the George Washington National Forest Land and Resource  
Management Plan areas follows.

In the Plan revision the Forest Service should :

Ensure that all riparian areas, sources of clean water and Brook Trout streams  
are strictly protected from activities such as road building and logging or any activity  
that is damaging to these irreplaceable resources.

Backcountry recreation and wilderness conditions should be emphasized since  
these places are in increasingly short supply

Protect all existing old growth and mature forest, since these places are rapidly  
disappearing and increasingly important as critical habitat for songbirds, black  
bear and a diversity of life and for hiking camping hunting and fishing

Strictly protect all areas identified as GWNF Mountain Treasures for the above  
reasons

Strictly protect all Special Biological Areas

Fully protect and buffer rare and sensitive habitat conditions such as springs  
, seeps rock outcroppings, steep slopes, sensitive soils and rare forest types

Strictly protect all rare threatened and endangered species

Halt the below cost timber program that squanders millions of tax dollars

IF early successional forest must be fabricated for wildlife, recut sites logged in the last 30 years

Implement selective road closures for restoration of remote interior forests and to help prevent the spread of invasive species such as the Hemlock woolly adelgid

Reduce dependence on prescribed burns and allow lightning fires to burn in a contained manner....fully recognize the role natural disturbances play in promoting forest diversity and forest health.

Work to identify and designate and protect areas that qualify for wilderness study and Wild and Scenic River allocations

Examine withdrawing consent for oil and gas leases as well as commercial wind development across the whole national forest but especially in all Special Biological and sensitive areas. At the very least there should be no surface use stipulations and no road construction in Special Biological Areas, Appalachian Trail and other recreational trail areas, Wilderness study areas, near endangered species and Wild and Scenic River designations. Examine and study in detail the options for managing the forest in the light of gas and oil and wind development

Prepare a full EIS in support of plan revision

There are several places that we know and love that we believe should receive strict protection ,They are:

Sideling Hill(dramatic rock outcrops and outstanding recreational trail as well as great hunting and very few roads Diverse native wildflowers and native medicinal plants such as black cohosh and ginseng)

Walker Mountain(Spring and Seeps and sinkholes some natural wetlands and ponds.. James River Spiny Mussel present according to Mark Healy .Threatened by too much logging.)

Benson Run ,Shenendoah Mountain(diverse native wildflowers and native medicinal plants,remarkable beauty ,brook trout stream Panther seen recently on Shenendoah Mountain

Thank you for this opportunity to comment.  
Sincerely ,Shay ,Kim ,and Kim Bass Clanton



"Jim Hutzler"  
<pcc7407@verizon.net>

08/09/2008 11:10 AM

To: <comments-southern-georgewashington-jefferson@fs.fed.us>  
cc:  
Subject: No wind turbines or other industrial installations in our National Forests!

No wind turbines or other industrial installations in our National Forests!

Our National Forests were never intended to be used for industrial purposes. Money interests are chomping at the bit for every little remaining scrap of natural and beautiful America. It is time to say NO NO NO. For God's sake, STOP THE MADNESS!

Jim Hutzler

Alexandria, VA



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

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

08/09/2008 02:07 PM

Submitted by: Diana Parker<br>At: erthshr@comcast.net<br>Remark:

- Please oppose industrial scale wind factories on national forest ridges given the numerous environmental disturbances including habitat destruction, forest fragmentation, bird and bat fatalities, and lack of scientific data on impacts to wildlife.

- Protect all roadless areas more than they are now, and add un-inventoried roadless areas to roadless inventory, utilizing the definition from 2001 Roadless Rule.

- Protect watersheds in order to ensure high quality water for all the communities that utilize these watershed for their drinking water.

- Do not increase fragmentation by building more roads. 1800 miles of system roads in the GW is more than the budget can support for maintenance. Work towards closing roads that are no longer needed (this does NOT mean roads that are popular for recreational use and access).

- Protect and preserve mature forest for neo-tropical bird species, and other wildlife species that require mature forest habitat. Improve inventory of old growth, and protect old growth.

- Request that Forest Service limit surface occupancy to companies owning mineral rights for gas and oil leasing.

- Finally, request Wilderness designation on the Lee District for Three High Heads and Little Stony. On the Pedlar District for Adams Peak, Three Sisters, and Wilderness additions St Mary's. On the North River District for Beech Lick Knob, Skidmore Fork, Little River, additions to Ramseys Draft Wilderness, Crawford Mountain and Jerkemtight/Benson Run. On the Warm Springs District request wilderness for Laurel Fork, Little Allegheny Mountain and the Rough Mountain addition. Finally, on the James River District request Wilderness for Oliver Mountain, The Rich Hole Wilderness addition and Snake Run Ridge. .  
<br>



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

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

08/10/2008 06:38 PM

Submitted by: David Burns<br>At: david@thesolesource.net<br>Remark: Please do not allow the construction of industrial wind mills in the national forest. I think private land should be considered but not our national forest.<br>



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

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

08/11/2008 08:22 AM

Submitted by: Lynn Cameron<br>At: camerosl@jmu.edu<br>Remark: Planning Team,  
I heard the deadline for comments was August 8, but I was unable to find  
this on your plan revision web page. Will you continue to accept comments  
after August 8?

Thanks.

Lynn Cameron  
<br>

Dear Ms. Hayzer, August 12, 2008

I am writing concerning FreedomWorks LLC's interest in developing an industrial wind energy generating facility on Shenandoah Mountain. I strongly oppose this proposal as its impacts would far outweigh any benefits it provided. These impacts would include and are not limited to interior habitat fragmentation, mortality of many raptors and bats, groundwater ~~disruption~~ disruption from blasting for turbine bases, stream pollution from sediment from construction, damage to scenic vistas from Shenandoah National Park and the famed Shenandoah Valley, impacts to the quality of life of nearby residents, and disruption to the dark, starry nights many residents enjoy from turbine lights. I have educated myself on the issue of industrial wind energy, and I find it has no or

very little benefits or contributions to reducing our carbon dioxide emissions. It makes no sense to install these turbines which would require the cutting of many carbon dioxide absorbing trees, road construction which would require carbon dioxide emitting vehicles, shipping the turbines across the ocean and to the construction site via carbon dioxide emitting vehicles, and backup by a coal-fired power plant which would cut in when there is not enough energy to meet demand. In fact, the West Virginia Highlands Conservancy now opposes industrial wind energy projects because of ~~various~~ doubt that they actually replace any coal burning. I personally believe industrial wind energy, at least in the Appalachians, is a scam to take advantage of tax subsidies and people wishing to purchase renewable energy credits. I am very concerned that if this project is approved, the national forest

will be opened to industrial wind development. If industrial wind facilities are developed in our national forests, or anywhere for that matter, cumulative effects on wildlife could be massive. These facilities would very greatly alter, and in some cases, destroy ecosystems. The effects on wildlife would not only be felt in the Appalachians, but in areas where birds susceptible to turbine related mortality migrate to. Besides environmental impacts, this facility could be a danger to a thriving tourism industry. Turbines could greatly impact Shenandoah National Park, prized for views along Skyline Drive, the Shenandoah Valley, prized for its rural character, and the George Washington National Forest, prized for outstanding outdoor recreation. I hope you see why this proposal's application should be denied. Our environmentally sensitive mountains, thriving tourism industry,

and residents' quality of life should not be compromised for this unreliable form of energy that fails to accommodate any of our needs for clean, renewable energy. I oppose all industrial wind energy facilities in our national forests, the Appalachian Mountains, and anywhere else they fail to produce reliable, usable energy without backup. Thank you very much for your time.

Sincerely,

Kaleb Cahoon





"George Alderson"  
<[george7096@verizon.net](mailto:george7096@verizon.net)>

08/16/2008 07:43 AM

To: <[comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)>  
cc:  
Subject: George Washington Plan Revision

To the Forest Service:

This message will supplement our letter dated March 13, 2008, concerning the GWNF plan revision.

Our letter urged that the plan should provide protection for additional wilderness areas. We specifically ask the Forest Service to include the following areas as wilderness: Ramseys Draft Addition, Skidmore Fork, Little River, Laurel Fork, Beech Lick Knob, and Benson Run.

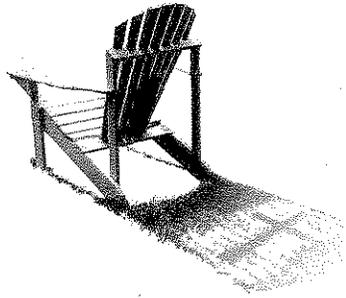
I (George) visited the Ramseys Draft area some 30 years ago, before part of it was designed as wilderness. Its wild qualities and remoteness make it an excellent candidate.

Please keep us informed as the planning process moves forward. Thank you for considering these added comments.

Sincerely,

George & Frances Alderson  
112 Hilton Avenue  
Baltimore, MD 21228  
E-mail: [george7096@verizon.net](mailto:george7096@verizon.net)  
Tel: 410-788-7096

# Shrine Mont



August 28, 2008

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

Re: George Washington National Forest Plan Revision

Dear Supervisor Hyzer,

This letter is submitted to you on behalf of the Board of Directors of the Shrine Mont Corporation, the owner and operator of Shrine Mont located in Orkney Springs, Virginia. Shrine Mont is a camp and conference center of the Episcopal Diocese of Virginia. Shrine Mont conducts a wide variety of activities, including summer camps, conferences and retreats. Other organizations also use Shrine Mont for an assortment of public events. The Shrine Mont property includes a number of historic buildings, including the Orkney Springs Hotel (the "Virginia House") which appears on the National Register of Historic Places. The property encompasses these buildings together with a total of approximately 1,000 acres adjoining the George Washington National Forest.

Because of the proximity of Shrine Mont to the George Washington National Forest, our camps and other activities make use of the Forest in a variety of ways. These activities include trail hiking for youth camps, families and guests; overnight camping for youth camps; and study programs focusing on forest ecology. Because Shrine Mont relies on the National Forest in conducting its programs, and because activities in the Forest affect the essential character of the facility, Shrine Mont intends to participate actively in the Forest Service's process to revise the George Washington National Forest Plan. Below, we provide information regarding Shrine Mont, its activities, and its use of and interest in the George Washington National Forest. We also provide certain preliminary recommendations to the Forest Service regarding the Revised Plan. We intend to continue following the plan revision process and we will provide additional input as the process moves forward. We would also appreciate being advised of opportunities for participation in the plan revision process by organizations such as ours and of any impending decisions or actions by the Forest Service which could affect the use of the George Washington National Forest or the essential character or nature of Shrine Mont.

## **History of Shrine Mont**

An excellent history of Shrine Mont, *The Cathedral Shrine of the Transfiguration and Shrine Mont* by George J. Cleveland, describes in detail the evolution of what is now called Shrine Mont. We will provide a copy of that publication to you separately. The town of Orkney Springs, in which Shrine Mont is located, was established in 1808. It is believed that the site was near the location of a former Indian settlement. Initially, the town of Orkney Springs was laid out in a fort-like configuration owing to the unsettled and potentially dangerous nature of its location. By the late 1820s, the natural springs were recognized for their medicinal qualities. Also by this time, a log hotel and a number of other buildings had been erected to accommodate visitors to the springs. Construction of the oldest of the present Shrine Mont buildings (the Maryland House) was commenced prior to the Civil War but the war interrupted its construction and it was completed after the war. By 1873 the present Pennsylvania House had been constructed. Seven detached two-story cottages were built during his time and remain in use today. By 1876, a hotel had been built on the present site of the Virginia House. Many additional homes and cottages were built in the vicinity of the springs and are included in the Shrine Mont property today. Throughout the remainder of the 19<sup>th</sup> century and the 20<sup>th</sup> century, Shrine Mont continued as a place of rest, relaxation and healing. In August 1976, Shrine Mont was designated for inclusion in the National Register of Historic Places.

In the latter part of the 19<sup>th</sup> century, Shrine Mont became a place of focus for the Episcopal Church in Virginia. The Church and clergy acquired a number of buildings in the early part of the 20<sup>th</sup> century. In 1925, construction of the current Cathedral Shrine was completed and the Shrine was consecrated on August 6, 1925. Following the consecration of the Shrine, additional land was purchased and buildings were built or acquired. This process continues today with additional construction and, importantly, continuing repair and restoration of the existing facilities.

## **The Shrine Mont Program**

Shrine Mont is used for a wide variety of programs conducted by Shrine Mont as well as for activities conducted by other groups. Shrine Mont holds an extensive series of summer camps, including St. George's Camp, St. Andrew's Camp, St. Sebastian's Sports Camp, the Senior High Youth Conference, St. Elizabeth's Camp, Explorers Camp, Music and Drama Camp, and Art Camp. More than 850 young people attend or work at these camps each summer. The camps provide an opportunity for many young people to experience and learn to appreciate a rural setting, the beauty of nature and the strong bonds which develop through sharing these experiences. In addition, Shrine Mont is used as a retreat and conference location by the Diocese of Virginia, by more than 100 churches of the Diocese and by churches of other denominations, as well. The facility is also used to stage a number of popular and well-attended public events. Among these are the Shenandoah Valley Music Festival, the Bishop's Bluegrass Festival, the Tee with the Bishop Golf Tournament and a variety of other activities.

For many years, Shrine Mont has been called “A Place Apart.” This is a reference to the essential rural and wild character of Shrine Mont and its surrounding area which has existed for 200 years since the site was first identified for the location of a town, and soon after that, as a destination for healing, relaxation and retreat. The activities conducted at Shrine Mont today are an outgrowth of those early visits to the healing springs and they continue to rely upon that essential character in maintaining Shrine Mont as “A Place Apart.”

### **Shrine Mont’s Relationship with the George Washington National Forest**

The Shrine Mont property adjoins the George Washington National Forest. Many of the activities conducted at Shrine Mont, including its summer camps, conferences and meetings, make use of the Forest itself. Summer campers hike in the Forest and enjoy nature studies there. In particular, Explorers Camp, St. George’s Camp, Senior High Youth Conference and St. Andrew’s Camp all utilize the Forest for hiking, camping and nature studies. Our camps are excellent stewards of the Forest—they stay on the trails at all times, they pack out whatever they carry in and they pick up litter left behind by others. As able, given the age of the campers, they will also do some trail maintenance and remove debris from storms. Other Shrine Mont groups make use of the Forest by hiking and nature studies. Shrine Mont also relies upon the existing character of the Forest as a rural and undeveloped area to make its programs attractive. The introduction of incompatible activities in the Forest could change this essential character and would directly impinge upon Shrine Mont’s programs and its mission to serve as “A Place Apart” from the hustle and bustle of today’s world.

### **Shrine Mont’s Preliminary Recommendations Regarding the Revised Plan**

Shrine Mont recommends that the Forest Service incorporate within its Revised Plan guidelines and conditions which will maintain and improve the character of the George Washington National Forest as a rural and undeveloped area. Shrine Mont is particularly concerned that the Revised Plan not contemplate or permit uses of the Forest which are incompatible with this essential quality. Such incompatible uses would include but are not limited to the erection of large wind turbines along the ridges in the Forest, particularly on the North Mountain ridge in Shenandoah County. The construction of such turbines will not only directly affect the use of the Forest by Shrine Mont participants but also will impinge upon the essential essence of Shrine Mont itself by severely compromising the view from the Shrine Mont property, introducing non-natural noises which would be perceptible from Shrine Mont and its environs, and impacting the thousands of Shrine Mont guests who enjoy recreation in the Forest every year.

Shrine Mont will continue to follow the Plan Development process and will participate by making additional recommendations as the process evolves. We appreciate very much the opportunity to share our views and we would welcome any inquiries you might have. We would also like to invite you to visit Shrine Mont, and will contact you in the near future to arrange a visit and tour.

Sincerely,

The Board of Directors  
Shrine Mont, Inc.



The Rt. Rev. Peter James Lee, President of Shrine Mont  
Bishop of the Episcopal Diocese of Virginia

Mr. Kevin Moomaw, Executive Director, Shrine Mont

Mr. Joseph Paxton, Broadway VA – Vice-President

Ms. Joan Albiston, Charlottesville VA

Mr. J. Dixon Edge, Esq., McLean VA

Mr. Fred Forstall, Fairfax, VA

Ms. Barbara Levy, Potomac Falls, VA

Ms. Kate Parthemos, Richmond VA

Ms. Janet Peyton, Richmond VA

Ms. Betsy Poist, Charlottesville VA

The Rev. Deborah Rutter, Front Royal, VA

Mr. Thomas von Hemert, Crozet VA

Mr. Douglas Wheeler, Arlington VA

Robert Fener  
1011 Swapping Camp Road  
Amherst, Virginia 24521

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

September 11, 2008

Thank you for allowing me to comment regarding the George Washington National Forest's new Plan. I am stating the following in writing for the administrative record on the off chance that I cannot comment in person.

I had the dubious honor of attending one of the work sessions at the Hot Springs Church. Seated with me was a gentleman who swore he'd kill anyone who harmed his hunting dog yet wanted more logging to subsidize his hobby of grouse killing. Ironically he was a farmer but couldn't set aside any of his own land for grouse habitat. Another gentleman, complained that because of gated roads he was only able to kill ten Bobcats. In keeping with the aim of civilized interaction I kept my comments to myself regarding mental illness. If this is the norm for hunters, then it would be fitting in a Forest Plan that encompasses multiple usages to have a NO KILL area. We use wilderness and old growth designation to minimize the impact of logging, we should do the equivalent for the fauna that are constantly being harassed and murdered.

When the grouse start killing the bobcats, then we can come up with a humane relocation plan.

Thank you once again for allowing me to comment under NEPA.

Sincerely,

Robert Fener



September 13, 2008

To Whom It May Concern,

Thanks for this opportunity to express some thoughts and desires for the updated comprehensive G. W. N. Forest plan. I have had the pleasure of riding the local trails on horseback since I was a young lady. As a horsewoman I would like to encourage more trails for equestrian use.

I am concerned about sharing these trails with bikers. I predict a fatality when a silently but rapidly moving biker bears down on a horse climbing a trail. Even the most well trained horse is a flight animal that will react unpredictably when frightened. I am aware that both riders and bikers want and deserve access to these public lands, but there is a real safety issue involved. The only thought is that perhaps the bikes could be fitted with a device that would emit sounds in a frequency that was inaudible for people but that could be heard by horses so they would be forewarned of approaching bikers.

I believe user fees should be enacted for bikers, hikers and horseman; they all cause erosion and should share the cost of maintaining the trails. Easier methods for adopting a trail would be nice. Being able to use chainsaws would make work much more manageable. It sure would be nice to adopt a trail under the guidance of a Forest Ranger. To be held accountable to one knowledgeable staff member could provide a nice working relationship between user volunteers and staff. I would love to meet and tank te people who clear and maintain the trails we use. How about a volunteer appreciation picnic with slides? I'll donate the barn for such a get together in my district.

Some of the trail heads are inaccessible due to development (Big Run) and others lack adequate parking off the road. Is there anything that can be done about these problems? I sure do miss the Ramsey's Draft ride. I guess wilderness means no cutting of downfall with chainsaws so trails are virtually impassable on horseback.

It is unfortunate that it is difficult to stay out of earshot of motorized vehicles. Less ATV trails would make the trails less noisy. It would be nice to push some trails deeper into the forest and further away from roads and all of the noise that accompanies cars, trucks and motorcycles.

I don't think the G.W.N.F. should allow wind turbans to be built on our public land. There are enough private lands to provide sites for wind generated power. Let's protect the birds and animals that need the forest as a habitat.

Feel free to contact me regarding these comments.

Sincerely,

A handwritten signature in cursive script that reads "D. Frazier". The signature is written in black ink and is positioned to the right of the typed name "Dolly Frazier".

Dolly Frazier

*Dolly Frazier @ Comcast.net Ko*

Comments

9/13/08

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

The National Wild Turkey Federation supports conservation of the wild turkey and its habitat and preservation of the hunting tradition. The NWTF has over 580,000 members. Over seven thousand of these members reside in Virginia and even more hunt in Virginia.

There are already 290,000 acres of the George Washington National Forest that have been removed from consideration for active wildlife management. The draft plan has identified an additional 130,000 acres for wilderness consideration. That is 42% of the GWNF. This is unacceptable. There should be no more acres removed from active wildlife management.

Large blocks of old geriatric forest are wildlife wastelands. There is little food or cover at the level that birds and animals live. Most wildlife need a diverse habitat including small blocks of herbaceous grass and forbs, early successional habitat, young forest, and old forest. This kind of habitat is not available where active wildlife management is excluded. The American Bird Conservancy and the National Audubon Society both have named loss of early successional Eastern deciduous forest as one the most threatened bird habitats. The National Wild Turkey Federation has determined that early successional habitat is critical for the recruitment of turkeys.

Roadless areas go right up to roads. In existing roadless areas, there should be a significant setback from all roads. These areas can be managed for wildlife from existing roads. Why exclude these areas from management?

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.

This cannot be done with the current and proposed wilderness areas.

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.

Rick Layser  
148 Troxel Gap Road  
Middlebrook VA, 24459  
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540-886-1584  
[LOKI4@RICA.NET](mailto:LOKI4@RICA.NET)  
SEPTEMBER 14, 2008

George Washington National Forest - Supervisor's Office  
5162 Valleypointe Pkwy.  
Roanoke, VA 24019  
888-265-0019  
540-265-5173  
[comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)

to: Supervisor Maureen Hyzer, Kenneth Landgraf, Dave Plunket, and all whom this concerns  
re: Comments pertaining to the "Preliminary Draft Working Paper August 21, 2008 Potential Wilderness Inventory" and "Final Process Paper of August 21, 2008 George Washington NF Potential Wilderness Area Guidance" and GWNF Plan Revision

\*\*\*\*\* It is good to see that the GWNF planners included more areas in the draft "Potential Wilderness Inventory" than were in the previous roadless area inventories (e.g., Scaffold Run (Galford Gap), Dunkle Knob, Little Mare Mountain, Toms Knob (Potts Mountain), Archer Knob, and Beech Lick Knob).

\*\*\*\*\* It is also good to see that the Forest Service significantly expanded the size of some of the areas listed in the draft "Potential Wilderness Inventory" over the dimensions used in the previous roadless area inventories (e.g., Oak Knob, North Massanutten, Beards Mountain, Little Allegheny, High Knob (the Dry River portion), Jerkentight, and Little River).

\*\*\*\*\* Re-examination and re-inventory of some of the listed areas are necessary as the currently used boundaries do not include all the qualifying acreage; *i.e.*, the expansion of the Elliot Knob, Three Sisters, Beech Lick Knob, Big Schloss, Jerkentight, and Beards Mountain potential Wilderness areas. The areas used by the Forest Service are significantly smaller than the areas of the same name mapped in the GWNF "Mountain Treasures" publication (in possession by the agency).

\*\*\*\*\* So far, the FS has failed to inventory 33 Mountain Treasures as "potential wilderness": West Back Creek Mountain, Back Creek Mountain, Warm Springs Mountain, Fore Mountain, Short Mountain, Longdale Furnace, Mud Run Mountain, Snake Run Ridge, Slatey Mountain, Jerrys Run, Panther Knob, Signal Corps Knob, Sideling Hill, Walker Mountain, Hankey Mountain/Trimble Mountain, Hogpen Mountain, Little Cow Knob, Wildcat Ridge, Feedstone Mountain, Kretchie Mountain, Broad Run, Jonnies Knob, Great North Mountain (on Lee RD), Falls Ridge, Church Mountain, Cove Mountain, Long Mountain, Catback Mountain, Short Horse

Mountain, Southern Massanutten, Signal Knob, The Friar, and Whites Peak. These areas total approximately 210,000 acres (~20% of the Forest).

Most if not ALL of these areas meet the qualifications for being inventoried as “potential Wilderness” and should be added to the official “inventory of potential Wilderness”.

\*\*\*\*\* The FS failed to inventory 2 previously “inventoried roadless areas” (listed in the 1993 GWNF FEIS, the 1997 SAA, and the 2000 RAC FEIS) as “potential wilderness”: Southern Massanutten and The Friar. These areas meet the qualifications for being inventoried as “potential Wilderness” and should be added to the official “inventory of potential Wilderness”.

\*\*\*\*\* According to at least one court judgment, identification of areas in an “inventory” is merely an initial step that may do little to actually protect Forest lands: “Congress has provided that potential wilderness areas will not be afforded special protection based solely on their status as potential wilderness areas until they are recommended for wilderness designation in a Final Revised Forest Plan, accordingly, no legal consequences will flow from an area's inclusion or exclusion from a preliminary roadless inventory.” Judge James C. Turk's August 17, 1998 ruling in Shenandoah Ecosystems Defense Group *et al.* (Case Number 98-0388-R in Western District of Virginia)

Also see pg. 18 of Guidance: “the presence or absence of an area on an inventory is of little concern to Congress. In the current bill before Congress, Stone Mountain was not part of the Jefferson Roadless Inventory, but was recommended for wilderness in the Forest Plan and is proposed as wilderness. Lynn Camp Creek was not included in the Jefferson Roadless Inventory, was not recommended for wilderness, but is proposed as a Wilderness Study Area. James River Face Wilderness Addition was in the Jefferson Roadless Inventory, was recommended for wilderness in the Forest Plan, but is not included for wilderness designation in the bill.”

Of course, the above quote from the Turk ruling fails to reflect that placement into a “roadless area” inventory (or perhaps now a “potential wilderness area” inventory) *is* an important factor. Numerous federal court rulings have made clear that developments such as timber sales in an inventoried roadless area are significant actions that demand the preparation of an EIS. And a court this year also extended such consideration (*i.e.*, significance and the need for an EIS) to roadless areas that the FS had failed to inventory. It is not clear that the same “roadless” arguments would apply here to “potential wilderness areas” inventoried or uninventoried (assuming the NFMA regulations currently being used are allowed to stand).

Taking the Turk ruling at face value, it is thus essential for the FS to formally “recommend” as many areas as possible for “Wilderness” designation in the Final Revised Forest Plan; otherwise their Wilderness values, qualities, benefits, and opportunities are not necessarily protected. This recommendation is a separate issue from which areas conservationists, other members of the public, or legislators eventually decide to include or exclude in a Wilderness bill before Congress.

\*\*\*\*\* All of the 37 areas identified by the Forest Service (see “Preliminary Draft Working Paper August 21, 2008 Potential Wilderness Inventory”) should be recommended for Wilderness designation in the Final Revised GW National Forest Plan. These areas all meet the criteria for such recommendations.

\*\*\*\*\* In addition to the above 37 preliminarily identified areas, many other GWNF Mountain Treasures should be recommended for Wilderness designation. In particular, the FS should inventory as “potential Wilderness” and recommend for Wilderness designation the following Treasures that have significant amounts of “semi-primitive” ROS lands (according to the 1993 GWNF Revised LRMP “Transportation Network and Recreational Opportunities” map): Wildcat Ridge (SPM 1 & 2), Hogpen Mountain (SPM 2), Hankey Mountain (SPM 1), Church Mountain (SPNM & SPM 2), Falls Ridge (SPM 2), Long Mountain (SPM 2), Great North Mountain (SPM 2), Jonnies Knob (SPNM), Catback Mountain (SPM 2), Signal Corp Knob (SPM 1 & 2), Short Horse Mountain (SPM 2), Southern Massanutten Mountain (SPNM and SPM 2), Warm Springs Mountain (SPM 2), Slaty Mountain (SPM 2), Panther Knob (SPM 2), and Short Mountain (SPM 2) [16 areas]. Some boundary adjustments may be helpful (such as using the utility line as the northern boundary at Great North Mountain).

\*\*\*\*\* The FS should also inventory as “potential Wilderness” and “recommend” for Wilderness designation the following Mountain Treasure areas that can be preserved due to the content and context of their physical terrain and natural conditions (their locations are conducive to the perpetuation of wilderness values): Little Cow Knob, Kretchie Mountain, Walker Mountain, Sideling Hill, Back Creek Mountain, West Back Creek Mountain, Broad Run, Snake Run Ridge, Mud Run Mountain, The Friar, and Whites Peak [10 areas]. **These areas are regaining a natural, untrammled appearance; human alterations existing in the areas are being affected by the forces of nature rather than humans and are disappearing or muted.** Some boundary adjustments may be helpful (such as perhaps moving the boundary about two miles north of the southern tip of Walker Mountain).

\*\*\*\*\* The Forest Service apparently has not properly determined “semi-primitive” allocations. Some lands the agency designates SPM or RN should be SPNM but have not been so allocated. Similarly, some lands designated RN should be SPM, and some considered to be SPM 1 might actually be SPM 2.

\*\*\*\*\* The FS should also examine the Big Ridge area (with SPM 2) in Highland County north of rt. 84 as a potential Wilderness area; also the McGraw Gap area (Pine Spur Ridge) south of Douthat State Park, east of FDR 125, and north of Smith Creek and FDR 336; and the Bear Wallow area on the JRRD northeast of Rich Patch, west of rt. 633, and mostly in Botetourt county.

\*\*\*\*\* I have made no direct mention above of Feedstone Mountain, Longdale, Jerrys Run, Fore Mountain, Cove Mountain, and Signal Knob Mountain Treasures. All these should also be

included in the GWNF "potential Wilderness inventory". These may also be recommended as Wilderness in the Plan. I have visited some but not all of these areas. Perhaps these areas can be preserved due to the content and context of their physical terrain and natural conditions (their locations are conducive to the perpetuation of wilderness values). For example, Cove Mountain are not easily accessible and offer remote conditions. And they are regaining a natural, untrammled appearance in that human alterations existing in the areas are being affected by the forces of nature rather than humans and are disappearing or muted (this is the case at Signal Knob and Feedstone Mountain).

\*\*\*\*\* I believe ALL the GWNF Mountain Treasures provide ample opportunities for solitude; I have not visited all of them so for some I cannot say for sure. However, **I have experienced feelings of solitude, a high degree of naturalness, opportunities for unconfined backcountry-type or primitive recreation, and isolation from human activities in the following GWNF Mountain Treasures:**

Scaffold Run, Paddy Lick, West Back Creek Mountain, Back Creek Mountain, Little Mare Mountain, Warm Springs Mountain, Short Mountain, Longdale Furnace, Fore Mountain, Toms Knob, Snake Run Ridge, Slaty Mountain, Jerrys Run, Adams Peak, Whites Peak, Signal Corps Knob, Benson Run, Archer Knob, Sideling Hill, Walker Mountain, Hankey Mountain/Trimble Mtn., Shaws Ridge, Beech Lick Knob, Hogpen Mountain, Broad Run, Little Cow Knob, Wildcat Ridge, Feedstone Mountain, Dunkle Knob, Kretchie Mountain, Jonnies Knob, Big Schloss (such as at Little North Mountain and north of Halfmoon Mountain), Great North Mountain (on Lee RD), Falls Ridge, Church Mountain, Catback Mountain, and Signal Knob, as well as all of the roadless areas inventoried in the 1993 Plan EIS, and Big Ridge in Highland County.

\*\*\*\*\* I am not aware that any "exercising of rights" as regards minerals/gas (e.g., the NEPA process has not concluded) is occurring on any of the GWNF Mountain Treasures. If any leasing occurs in any Treasure the area under lease should have a "No Surface Occupancy" (NSO) stipulation. Therefore, Mountain Treasure areas shall still qualify for the "inventory of potential Wilderness" even if it has the presence of a Federal lease. Even if an area is under other lease stipulations such as "Controlled Surface Use" or standard lease stipulations, an area still qualifies for the "inventory of potential Wilderness" as no current on-the-ground activities are occurring.

The existence of private mineral rights leases is a factor that may be used to evaluate "potential" areas for "recommended Wilderness" status in the revised Plan, but it is not proper to use the presence of leases to deny the placement of areas into the "inventory of potential Wilderness".

So as to avoid setting up conflicts, no mineral/gas leases should be sold in any area of the Forest while the Plan is under revision.

Public involvement, disclosure of effects, and NEPA analysis occurs at both the Forest Plan level and the project specific level (such as when a permittee submits a drilling plan).

\*\*\*\*\* If any of the areas named in previous sections above are not recommended as Wilderness in the revised Plan they should be allocated to one (or more) of the following Management Areas as used in the current GWNF Plan: MA 1 Minimal Level Management, MA 2 Migration Corridors, MA 3 Sensitive Watersheds/Municipal Watersheds, MA 4 Special Interest Areas (including RNAs), MA 9 Back Country/Remote Highlands, or MA 21 Special Management

Areas; and/or to one (or more) of the following Management Prescriptions as used in the current JNF Plan: 0A Custodial Management, 4B Proposed Research Natural Areas, 4C1 Geologic Areas, 4D Botanical and Zoological Areas, 4E1a Cultural and Heritage Areas, 4F Scenic Areas, 9A2 Reference Watersheds, 9A4 Aquatic Habitat Areas, 9F Rare Communities, or 12C Remote Backcountry Recreation – Natural Processes. And/or the agency can design a new special MA/MP (that designates sites as unsuitable for “timber harvest” and “production”, road construction and reconstruction, and mineral development) that can be applied to Mountain Treasures.

\*\*\*\*\* The agency needs to consider and evaluate in detail allocating a new Special Area designation to Mountain Treasures that the FS does not recommend as Wilderness.

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option recommends as Wilderness all the areas in the “inventory of potential Wilderness”.

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option recommends as Wilderness all (or portions of all) of the Mountain Treasures.

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option that applies “no surface use” stipulations to all the Mountain Treasures (subject to existing rights).

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option that withdraws consent (for mineral development) to all the Mountain Treasures (subject to existing rights).

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option that applies “no surface use” stipulations to all the areas in the “inventory of potential Wilderness” (subject to existing rights).

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option that withdraws consent (for mineral development) to all the areas in the “inventory of potential Wilderness” (subject to existing rights).

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option that considers as not suitable for wind energy development all the Mountain Treasures (subject to existing rights).

\*\*\*\*\* The agency needs to consider and evaluate in detail an alternative/option that considers as not suitable for wind energy development all the areas in the “inventory of potential Wilderness” (subject to existing rights).

“3. *Electronic installations, such as cell towers, television, radio, and telephone repeaters, and the like, provided their impact is minimal. . . .* These sites provide valuable communication and service throughout the GWJEFF NF and the eastern United States. Thus their impacts are not considered minimal.” - pg. 4 of Guidance

\*\*\*\*\* The FS has defined minimal impacts out of existence and thereby improperly biased the identification of potential Wilderness Areas. By this specious logic NO site would have a

minimal impact, no matter how small the specific installation area involved.

“With private land comes it [sic] inherent need for electrical power lines, telephone lines, water and sewer lines, and road access, all improvements that become permanent on the land and these improvements then come into conflict with potential wilderness designation.” - pg. 5 of Guidance

\*\*\*\*\* This “inherent need” is not true. Many private lands exist without these developments.

“Areas that have been prescribed burned are not land that is ‘regaining a natural, untrammelled appearance’ (Handbook at Chapter 71.12 (1)).” - pg. 7 of Guidance

\*\*\*\*\* This is unreasonable and nonsensical as the agency states elsewhere that the burning is needed for the Forest to regain a natural appearance.

“The Forest Service has made it a priority to reintroduce fire into fire dependent ecosystems to help promote ecosystem health. Prescribed fire is viewed by the land management agencies as an agent of change that helps ‘mother nature’ return an ecosystem to its historic range. . . . By increasing the Forest’s prescribed fire objective, the Forest can begin to move towards a Condition Class 2 and eventually condition class 1 where we are within the natural historic range of vegetation and fuel composition as the result of more frequent and lower severity fires.” - GWNF DCER pg. 104

“In the evaluation consideration should be given to adjusting the boundary about one-half mile from the road that provides access to the historically harvested areas due to the established pattern of use. We believe one-half mile is generally the maximum length of any single temporary road constructed to access a cutting unit.” - pg. 8 of Guidance

\*\*\*\*\* This rationale is contradictory and spurious. A multitude of EAs and FONSI’s state or imply that logging sites and “temporary” roads swiftly regain a natural appearance and are areas where the forces of nature are operant. The FS takes great pains to tell the public that these management actions (*viz.*, “cutting units” and “temporary roads”) have NO significant impact. Multitudinous EAs inform the public that the effects of these management actions are minimal, soon dominated by the forces of nature, and quick to disappear. There should be NO required boundary adjustments due to logged-over tracts or the construction of “temporary” roads (assuming that the amounts are within the 20% guideline). As the FS EAs asseverate, the human alterations at these sites are being affected by the forces of nature and are disappearing or muted. “It is clear that in the opinion of Congress, once any human management activity is halted, areas on this Forest quickly regain a natural, untrammelled appearance and that the improvements quickly disappear or are muted.” (Guidance at pg. 17)

“Primitive is defined as ‘pertaining to an early age; characterized by simplicity’ (Webster’s Dictionary 1976). Primitive recreation in wilderness has largely been interpreted as travel by non-motorized and non-mechanical means (such as horse, foot, canoe) that reinforces the connection to our American heritage.” - pg. 9 of Guidance

\*\*\*\*\* ALL the GWNF Mountain Treasures provide ample opportunities for a recreational experience that meets this criterion of “primitive” (*i.e.*, travel by non-motorized and non-mechanical means).

“. . . the ROS system) represents an indicator that can be used to measure solitude. The semi-

primitive core, for the purposes of this review, is a way to measure the amount of area that is secluded from the influences of other people.” - pg. 10 of Guidance

\*\*\*\*\* The ROS system is merely one way to examine solitude; it is NOT the sole or even best way to measure or evaluate this condition, and should not be construed or used as such. Presence of a “semi-primitive” core greater than or equal to 2,500 acres is NOT a necessity for identifying areas that could provide “opportunities for solitude or a primitive and unconfined type of recreation”.

“As described below, the development of lands around the Forest are expected to increase substantially. . . . This is especially important on the GW since it is projected to have the most area of increases in housing density on adjacent lands of all national forests or grasslands, with projected changes on more than 1.4 million adjacent private rural acres.” - pg. 11 of Guidance

\*\*\*\*\* **This contradicts statements in virtually EVERY TIMBER SALE EA I have seen in the past 18 years in which the FS states that conditions on private lands are expected to remain the same (so then cumulative impacts of the logging are not a significant concern).** So not only are conditions on private lands changing, but they are changing “the most . . . of all national forests”. How could this have gone unnoticed over all these years? The answer of course is that it honestly could not. That such a flagrant and expedient contradiction is used now after all these years is reprehensible. Whoever is responsible for such contemptuous behavior towards the public has no business working for this agency, and certainly has no right to suck tax-dollars out of my or anyone else’s pockets. If any of you ever wonder how it is that so much of the public has so little trust in this agency, things like THIS are the reason why.

“Long, narrow areas are more difficult to preserve . . .” - pg. 11

\*\*\*\*\* This rationale of course biases the selection process against virtually an entire physiographic province (*viz.*, the Ridge and Valley; as mentioned below, this is also the name of an ecological “section” and “subsection”). Outside of Shenandoah Mountain, the mountains in this province (wherein lie most GW National Forest lands) are typically “narrow linear” ridges. Here it is difficult for roadless areas or potential Wilderness areas to not be more-or-less long narrow areas.

A hierarchical order of defining and mapping ecosystems has been developed by Bailey *et al* (1994) and Avers *et al* (1994); also see Keys *et al* 1995. The ecological units composing this nested hierarchy are identified at all levels by the integration of biological and physical components of the environment. The scale of these units ranges from the global and continental (made up respectively of Domains and Divisions) down to land units of hundreds to less than ten acres in size (Landtypes and Landtype Phases).

In this classification, all or much (depending on the scale of the unit) of the GWNF area lies within the Central Appalachian Broadleaf Forest - Coniferous Forest - Meadow Province (M221), Northern Ridge and Valley Section (M221A), Ridge and Valley Subsection (M221Aa), and Appalachian Narrow Linear Mountains Landtype Association (M221Aa03).

“Irregular borders of an area would also make it much more difficult to preserve.” - pg. 11

\*\*\*\*\* This is not necessarily so. Irregular boundaries could make it more difficult for evenly patterned developments to occur along the length of the boundary on adjacent lands.

“In addition to adjacent development, these types of boundaries often result in illegal ATV use

and development of other types of user-created trails.” - pg. 11

\*\*\*\*\* That there exist criminals who may not respect Wilderness Areas is a very poor excuse for not inventorying/evaluating/recommending/designating such Areas. This amounts to allowing the ignorant/apathetic/arrogant/malignant to dictate what should or should not be protected.

“Areas that are located along the side of ridge would be much harder to preserve.” - pg. 12

\*\*\*\*\* This is absurd on its face. Thunder Ridge WA is an obvious example that comes to mind. And numerous other WAs certainly include the sides of ridges. Such sites are not “much harder to preserve” unless the FS makes them so (such as, *e.g.*, putting timber sales immediately adjacent to their boundaries).

\*\*\*\*\* At various locations throughout this Guidance the FS appears irrationally concerned with private lands adjacent to the National Forest. Certainly there are or can be problems with developments on private lands. However, it is improper to assume *a priori* that private lands adjacent to potential Wilderness Areas are a problem. The FS must recognize that not all adjacent private land-holders are a menace. Such is certainly not the case on the GWNF. Some private individuals or entities manage their land at least as well as, and sometimes better than, the Forest Service.

*“4. The location of the area is conducive to the perpetuation of wilderness values. Consider the relationship of the area to sources of noise, air, and water pollution, as well as unsightly conditions that would have an effect on the wilderness experience. The amount and pattern of Federal ownership is also an influencing factor.*

Guidance: This criteria is considered through the semi-primitive core attribute discussed earlier. This semi-primitive core helps to separate the sights, sounds, sources of pollution and other activities originating outside an area and thus provides an indicator for solitude and unconfined recreation.” - pg. 14 of Guidance

\*\*\*\*\* Occurrence of a “semi-primitive core” should NOT be the exclusive method used to determine the attainment of this criterion. An area may be sufficiently separated from sources of noise, air, and water pollution, as well as unsightly conditions without having a “semi-primitive core”. Much depends on the topographic and geographic context of the area, as well as the amount and pattern of Federal and private ownership. An area without a “semi-primitive core” may be farther from sources of noise, air, and water pollution, as well as unsightly conditions than an area with such a core; “semi-primitive” condition in large part merely depends upon distance from roads in the Forest. An area, be it small or large, may be closer to such roads, and therefore not be considered “semi-primitive”, yet due to its terrain and landscape context actually be more remote from significant sources of noise, air, water pollution, and unsightly conditions than some other areas said to contain “semi-primitive” lands. Examples are the **Little Cow Knob, Kretchie Mountain, Back Creek Mountain, Broad Run, The Friar, and Snake Run Ridge Mountain Treasures**; due to their landscape location and ownership patterns these areas are shielded from or remote from significant sources of noise, air, water pollution, and unsightly conditions, even though they do not have a so-called “semi-primitive core”. (And the ROS designations used by the FS may not be accurate.) The geographic locations and contexts of these areas are conducive to the perpetuation of wilderness values. These areas can be preserved due to the content and context of their physical terrain and natural conditions. These same factors and rationale apply to areas that contain “semi-primitive” lands that are not included in the FS’

inventory of August 21, 2008, such as **Great North Mountain, Jonnies Knob, Slatey Mountain, Warm Springs Mountain, and Short Mountain MTs.**

\*\*\*\*\* It appears the GW staff are improperly considering “sights and sounds” from outside areas, such as housing development on private land, in deciding whether areas qualify for the inventory. Congress has strongly and clearly expressed that the Forest Service should not use this “sights and sounds” criteria to identify potential Wilderness areas.

\*\*\*\*\* The FS has devised inventory guidance that is inconsistent with the will of Congress.

See “71.12 Par. (4) (1995 R8 Guidance) Areas have semi-primitive (SP) core solitude greater than 2500 acres on NFS lands or otherwise provide solitude (e.g. topography). Eliminates smaller and/or narrower areas with small SP cores (limited solitude). Smaller or narrower SP core areas often indicate private land influenced core.” (Guidance at pg. 19)

Congress has made it clear that designation of Wilderness Areas is not dependant on even the presence of “semi-primitive” ROS lands, let alone the possession of a “semi-primitive core” of 2500 acres. See, *e.g.*, pg. 17 of Guidance (section rubric “Congressional Designations”).

The FS is unwilling to inventory small narrow areas, areas with irregular boundaries, or areas with appendages (see pp. 11-12 of Guidance). However, Congress regularly designates small and/or narrow areas as Wilderness (see Guidance pg. 17). Beaver Creek Wilderness on Kentucky’s Daniel Boone NF is perhaps the epitome of a small, narrow Wilderness Area with appendages and an irregular boundary.

The FS appears to be improperly concerned about private lands bounding areas; see, *e.g.*, pg. 12 of Guidance. However, see pp. 17-18 of Guidance regarding Congressional Wilderness designations.

Degree of remoteness is another filter that the FS is improperly applying. It is not clear how the FS defines “remote” or “remoteness”. However, Congress regularly designates Wilderness Areas close to significant developments, even adjacent to Interstate highways (*e.g.*, Rich Hole and Kimberling Creek WAs). See pg. 17 of Guidance.

In formulating this “inventory of potential Wilderness” the Forest Service is using a version of the NFMA regulations that have been found to be illegal, and that is currently the subject of yet another lawsuit. Use of these Bush regulations is improper and unreasonable and an abuse of discretion. These illegal regulations do not properly and adequately implement the NFMA. For instance, they fail to sustain the Forest’s diversity and fail to ensure the protection of viable populations of flora and fauna.

Steven Krichbaum  
September 14, 2008



Christopher S  
Rose/R8/USDAFS  
09/17/2008 04:17 PM

To: Kenneth Landgraf/R8/USDAFS@FSNOTES, Karen B  
Overcash/R8/USDAFS@FSNOTES  
cc  
bcc  
Subject: Plan revision meeting feedback

Chris Rose  
George Washington & Jefferson NFs  
5162 Valleypointe Parkway  
Roanoke, VA 24019  
540-265-5172  
csrose@fs.fed.us

----- Forwarded by Christopher S Rose/R8/USDAFS on 09/17/2008 04:17 PM -----

Mailroom R8 George  
Washington Jefferson  
Sent by: Carol Lawson  
09/17/2008 04:15 PM

To: JoBeth Brown/R8/USDAFS@FSNOTES, Christopher S  
Rose/R8/USDAFS@FSNOTES  
cc  
Subject: Re: PAO web page feedback

"Cliff and Oma Rexrode" <cliffandoma@ntelos.net>



"Cliff and Oma  
Rexrode"  
<cliffandoma@ntelo  
s.net>

09/16/2008 09:44  
AM

To: <Mailroom\_R8\_George\_Washington\_Jefferson@fs.fed.us>  
cc:  
Subject: PAO web page feedback

Sept. 16, 2008

TO: Planning staff GWNF

I recently attended the meeting at Turner Ashby High School in regards to your proposal to identify 370,000 acres as potential wilderness study areas. I happened to notice that the criteria for selecting these areas only considered the resource activities that have taken place since the 1993 plan went into effect. All management activities occurring before 1993 were ignored. Since 1993 your on the ground resource activities have been drastically reduced. Therefore, all of your criteria for determining what is suitable for wilderness study areas is extremely biased.

In my 30 years of interaction with the GWNF (timber, buyer, citizen activist, hunter, fisherman, etc.) I have never seen such a ludicrous and unprofessional manipulation of data to achieve a prejudiced agenda.

I have several specific questions which I would ask that you provide a clear and concise answers. 1) When identifying these potential wilderness study areas, why did you identify only the activities that occurred in the last 15 years and totally ignored all management prior to the current plan? 2) What is the justification for shutting off all management activities on one third of the GW. 3) Why is the vast majority of the GWNF being managed(?) for old growth? 4) Why does wilderness and old growth have unmitigated priority compared to timber harvesting and early successional wildlife habitat .

Your response would be greatly appreciated.

Sincerely,

Cliff Rexrode



Kenneth  
Landgraf/R8/USDAFS  
09/17/2008 02:58 PM

To dennislabare@earthlink.net,  
Al.Bourgeois@dgif.virginia.gov  
cc Karen B Overcash/R8/USDAFS@FSNOTES, Carol H  
Croy/R8/USDAFS@FSNOTES  
bcc  
Subject Fw: GW Plan

Dennis,

I received your email about our plan revision meetings on potential wilderness areas. Dave Plunkett retired a couple weeks ago. Karen Overcash is now taking on Dave's duties in plan revision. Let me try to answer your questions.

Let me start with the clarification that the Forest does not have a wilderness "proposal." One the requirements of our planning regulations is "all NFS lands possessing wilderness characteristics must be considered for recommendation as potential wilderness areas during plan development or revision." This is just about the same language that we have had in our planning regulations since 1982. So every time we revise, we are required to inventory all the lands on the forest that meet the definition of wilderness and then evaluate those areas to determine which, if any, areas we may want to recommend to Congress for wilderness designation.

We have completed the inventory and identified 370,000 acres of land in 37 areas that are now on our Potential Wilderness Area inventory. As we move through the process we will evaluate each of these areas. One of the purposes of the meetings last week was to hear from people about the factors we should consider in the evaluation. We asked 3 questions at the meeting: 1) What are the characteristics that make this area a good wilderness? 2) What are the resource uses that might be foregone if this area became wilderness?; and 3) If not wilderness, how would you like to see this area managed?. We provided maps of each of the areas which displayed many of the factors that we thought people would be interested in while discussing the issues. One of the things on the maps was timber harvest that has been conducted since the plan was last revised in 1993 (thus the display of areas harvested in the past 15 years). This does not mean that we would not consider other factors or that we will limit ourselves to looking only 15 years back. We were asking for public input on what we should consider and how those factors affect each area. I hope that the person who reported to you raised the issue of grouse hunting as a conflicting use for the area that was being discussed. The intent of the meetings if for people to find out from others how these areas are currently being used.

We will be having meetings to discuss where and how much timber management needs to be conducted on the forest and we will also discuss prescribed fire use for habitat management. At those meetings it would be entirely appropriate for you to raise the question "In light of severe paucity of early successional habitats, the habitat age-class that is in the shortest supply on this forest and which has been damaging wildlife and local economies due to a shortage of forest products, this meeting and this plan proposes to discuss to place up to 370,000 acres into timber management classifications" Our current plan has about 350,000 acres of land identified as suitable for timber harvest. In our Draft Comprehensive Evaluation Report we recommend that we strive to maintain the existing amount of suitable acreage on the forest.

Again, the 370,000 acres of Potential Wilderness is not a proposal. It represents all of the areas that we have to evaluate for wilderness. We can also consider these areas for other types of management (within the confines of other requirements - like the 2001 Roadless Rule-pending its final resolution in the courts). We are asking people how they want to see

each of these areas managed.

The maps, a paper on how we completed the inventory and data on the areas is on our website.  
<http://www.fs.fed.us/r8/gwj/forestplan/revision/index.shtml>

If I haven't answered your questions, or if you have more, please contact me.

Ken Landgraf  
Planning & Forest Ecology Group Staff Officer  
George Washington and Jefferson National Forests  
(540) 265-5170  
e-mail: [klandgraf@fs.fed.us](mailto:klandgraf@fs.fed.us)

----- Forwarded by Kenneth Landgraf/R8/USDAFS on 09/17/2008 02:01 PM -----



Carol H Croy/R8/USDAFS

09/17/2008 01:02 PM

To: Kenneth Landgraf/R8/USDAFS@FSNOTES

cc

Subject: Fw: GW Plan

A message forwarded from Al Bourgeois concerning the GW Plan, in case you have not received the email sent to Dave Plunkett

Carol Hardy Croy, Ph.D.  
Forest Wildlife Biologist  
George Washington and Jefferson National Forests  
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540.265.5136  
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----- Forwarded by Carol H Croy/R8/USDAFS on 09/17/2008 01:00 PM -----



<[Al.Bourgeois@dgif.virginia.gov](mailto:Al.Bourgeois@dgif.virginia.gov)>

09/15/2008 10:36 AM

To: <[ragsbank@comcast.net](mailto:ragsbank@comcast.net)>, <[carolcroy@fs.fed.us](mailto:carolcroy@fs.fed.us)>,  
<[kenlangraff@fs.fed.us](mailto:kenlangraff@fs.fed.us)>, <[cdbrutonnwtf@wilkes.net](mailto:cdbrutonnwtf@wilkes.net)>

cc

Subject: FW: GW Plan

I'm not sure if Dave plunkett is retired yet or not, so I'm passing this along. Carol - please be sure that Ken Langraff sees this incase I don't have his correct e-mail address.

Enjoy, Al

**Al Bourgeois**

District Wildlife Biologist  
VA Dept. of Game & Inland Fisheries  
P.O. Box 996  
Verona, VA 24482  
Phone: (540) 248-9381  
Cell: (434) 981-6540

---

**From:** Dennis Labare [mailto:dennislabare@earthlink.net]

**Sent:** Friday, September 12, 2008 10:08 PM

**To:** David Plunkett

**Cc:** Bourgeois, Al; Jane Hogan; Hon. Matthew J. Lohr; Sherry Crumley; Bruce Ingram; Cliff and Oma Rexrode; Paul R. Howe; Randy Bush; Busch, Rick; Dr. Michael D. Zagata, Ex. Dir. & CEO

**Subject:** GW Plan

Dave:

You may remember me as a grouse hunter and organizer of a coalition of sportsmen's, etc, groups that are working with VDGIF in supporting a good plan for wildlife in the current cycle. We spoke at several of the previous meetings, those prior to all the lawsuits.

I've just heard a disturbing report from my brethren, so I'm writing you for some explanations and clarifications. I'm currently at my summer home in Maine, thus my absence from the meeting, and won't return until November, so I'm trying to keep up via this medium and the phone.

Yesterday, as I am told, one of two meetings were held to discuss forest plan issues. Out of this, I've learned there is some sort of extremely large "wilderness" proposal. Here is an excerpt from an e-mail from a colleague who attended last evening's meeting.

*"Went to a USFS meeting last night. Theme was the proposal to put 370,000 acres of the GW in Wilderness Study Areas. The one thing that caught my attention was only considering cut areas that have been done since the current plan started in 1993. Ignoring all cutting and abandoned roads made before 1993. For instance, several areas I have grouse hunted for over thirty years that have had periodic cutting for the last forty years are now considered OK for potential wilderness because the reduced cutting of the last 15 years only shows a minimal amount of disturbance during that time. I strongly objected to this criteria that ignores the historic management and use of large areas.*

*All of the maps with the 370,000 acres outlined, showed the cut areas for the last 15 years. If it was cut 16, 17, 18, etc. years ago nothing showed on the maps. If the GW gets away with this bullshit the other forests will follow suit. I'm really frustrated with gutless USFS."*

Dave, this is very troubling. My question to you is this: Why is such a proposal out there in the first place, as if its somehow an automatic that any such thing is being considered and where does such a number derive? Why is the question not, say, "In light of severe paucity of early successional habitats, the habitat age-class that is in the shortest supply on this forest and which has been damaging wildlife and local economies due to a shortage of forest products, this meeting and this plan proposes to discuss to place up to 370,000 acres into timber management classifications". Tell me, Dave.....Why not?

I will tell you this - the FS is in for a huge fight if this wilderness thinking has become normative on this plan and may include legal as well as political action. There is simply no scientific or economic basis for this kind of over the top destructiveness to the forest. If such a thing as this extremism should seem to prevail, I and others can only conclude that the FS has become nothing more than a pawn of the extremist preservationist agenda that is killing the national forest system in so many places and is just murder on dozens of wildlife species.

So, perhaps we can have a conversation here as to how such a thing can be avoided - the fight and the ridiculous notion of tying up 370K acres of the public's land to be essentially useless. I'm sure I don't have to tell you that wilderness is less than 3% of the annual visitation on all eastern NFs including the GW. Very simply, according to the FS's NVUM, this prescription holds virtually no interest among the public as they have expressed their visitation preferences and expenditures in the survey. This begs the question: Why does the FS ignore its own data and propose such contrary land use prescriptions?

I've posed several questions here and I would include among them those of my colleague, that will give you plenty to which you may respond, so I'll stop and look for your considered reply.

Thanks for your time.

Best,

Dennis

# COUNTY OF AUGUSTA, VA.

## BOARD OF SUPERVISORS

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South River

**PATRICK J. COFFIELD - COUNTY ADMINISTRATOR**

AUGUSTA COUNTY GOVERNMENT CENTER  
P.O. BOX 590, VERONA, VA 24482-0590  
(540) 245-5610 FAX (540) 245-5621  
coadmin@co.augusta.va.us

08-169  
September 25, 2008

VIA FAX

The Hon. James Webb  
U.S. Senate  
Russell Senate Office Building, Courtyard  
Washington, DC 20510

The Hon. John W. Warner  
U.S. Senate  
225 Russell Building  
Washington, DC 20510

The Hon. Robert W. Goodlatte  
U.S. House of Representatives  
2240 Rayburn House Office Building  
Washington, DC 20515

Gentlemen:

The George Washington National Forest occupies approximately 196,000 acres of land in Augusta County, which is more acreage than any other county in Virginia. We also have 16,392 acres of wilderness, which is more than any other county has in Virginia. The George Washington National Forest is in the process of revising its forest plan. The last revision was done in 1993.

On September 21<sup>st</sup>, our Board of Supervisors received a presentation by the Forest Service concerning the updated plan. The Forest Service is receiving input from the public at this time. The plan maps that were provided to us show another 99,000+ acres as potential wilderness areas in the County. These areas (as shown on the map) are adjacent to private land, adjacent to public roads, and would make up approximately 51% of the 196,000 acres within the county as potential wilderness areas.

There is also a potential wilderness area that incorporates Elliott's Knob. This location contains a major communication facility that a number of different government agencies use to provide coverage for emergency services, public TV, and other communication services.

The Board outlined some concerns about additional wilderness area in Augusta County:

1. In case of a forest fire, there is no way to fight a fire in a wilderness area. If the wilderness area is adjacent to private land, it becomes a real problem to County property owners.

2. Access: In this day and time when the baby boomers are reaching retirement, they may not be able to access the wilderness area by foot. Many individuals enjoy traveling into the National Forest with 4-wheel or other types of transportation that can assist them in enjoying the beautiful mountains and forest.

3. And finally, once an area is designated wilderness, it cannot revert back to any other use.

The decision on wilderness designation is left in the hands of Congress, and Congress needs to understand all the issues involved with wilderness designation.

At its September 24<sup>th</sup> meeting, the Board of Supervisors took action to send this letter and oppose any additional wilderness designation within Augusta County.

I would like to personally thank you for your service to the Commonwealth of Virginia and, if we can be of assistance to you, please do not hesitate to contact me.

Sincerely,



David R. Beyeler, Chairman  
Augusta County Board of Supervisors

✓  
cc: Elwood Burge, District Ranger  
North River Ranger Dist., Harrisonburg VA

9/22/08

In regards to the GW plan revision i write this as this is my back yard.

Why should i be concerned?

360,000 acres of land is being closed to my family and i not to mention all my friends.

my family and i spend most weekends during the summer camping and spend most days riding our mtn bikes on all the many trails including Beards mtn, tuscarora trail, Duncan hollow, Sugar knob, Wolf Gap.

Did i hear correctly?

all this land is still going to be open to half ton animals "horses" but i cant enjoy the forest on my 25 LB bike.

I am 47 yrs old and love the outdoors and really enjoy the exercise i get while mtn biking.

Whats wrong with this proposal?

its selfish and greedy and should be tossed aside.

I cant afford a horse and would rather not look like one.

Dont be a horses butt, let us ride.

Hilbird

Mark Stallard

resident of SHEN CTY



P.S. My favorite places to  
ride is Douthat State Park  
and Big Levels

①

Sept 25, 2008

USDA Forest Service  
Attn: Forest Plan Revision

Dear Maureen Flyzer, Supervisor

Please accept my comments for the  
G.W.J.N.F. revision plan.

- o Designate Beach Lick Knob + Church Mtn.  
as potential wilderness
- o Protect other identified VA. Mtn. Treasure  
areas

These areas are a great source for  
CLEAN WATER, NATIVE TROUT STREAMS  
OLD GROWTH FORESTS + Native plants  
Back country recreation  
BALD EAGLE habitat + wildlife  
migration corridors

- o No Wind Power on National Forest Land  
Leave that development to Private  
landowners
- o No more below cost logging sales  
They lose millions of tax payers dollars
- o Keep new road building to an absolute minimum  
Roads in the Nat. Forest cause a great  
deal of erosion in trout streams +  
rivers + in the surrounding neighborhoods

In conclusion; after flying over our great  
country from the East to West coast at 38,000 ft.  
this past July, I saw that this entire nation is  
divided into squares. The Appalachian Forest is  
the only place in the East NOT divided into  
squares. Wilderness is a dwindling resource.

ONE ACRE OF FOREST ABSORBS 6 TONS OF CARBON DIOXIDE + PUTS OUT 4 TONS OF OXYGEN PER YEAR.

Our children are plugged into a virtual reality. Wilderness' contribution to the sanity, humanity + health of mankind is great. We must do all that we can at this time to preserve + protect what we have left.

Please always err to conservation + good stewardship. The forest is our childrens' legacy.

Thank you,  
Sincerely,  
Mary Ann Yarsinske

Mary Ann Yarsinske  
15584 Yanketown Rd.  
Fulks Run VA. 22830



JOSEPH S. PAXTON  
County Administrator



## ROCKINGHAM COUNTY

September 26, 2008

### BOARD OF SUPERVISORS

PABLO CUEVAS

Election District No. 1

FREDERICK E. EBERLY

Election District No. 2

DEE E. FLOYD

Election District No. 3

WILLIAM B. KYGER, JR.

Election District No. 4

MICHAEL A. BREEDEN

Election District No. 5

Elwood Burge, District Ranger  
U.S. Forest Service  
North River Ranger District  
401 Oakwood Drive  
Harrisonburg, VA 22801

Ken Landgraf, Planning Staff Officer  
U.S. Forest Service  
Supervisor's Office  
5162 Valleypointe Parkway  
Roanoke, VA 24019-3050

Dear Gentlemen:

As you are in the process of revising the George Washington National Forest Land and Resource Management Plan, commonly referred to as the Forest Plan, the Rockingham County Board of Supervisors reiterates its position with regard to those lands located within Rockingham County.

During its September 24, 2008 meeting of the Rockingham County Board of Supervisors, the Board reaffirmed its opposition to designating any portion of County land located within the Forest as "wilderness areas."

The Board does not wish to restrict access to the many people who use the Forest for recreation as noted in its earlier actions from January 2008 and May 1991, where they passed resolutions opposing the Wilderness Area designations.

I have included copies of those resolutions and cite the recent action taken by the Board as further evidence they do not recommend the proposed restrictions be placed on users of the Forest by designating them as "wilderness areas."

Thank you for your time and attention to this issue.

Sincerely,



Joseph S. Paxton

Enclosures  
JSP/gs

POST OFFICE BOX 1252, HARRISONBURG, VIRGINIA 22803

TELEPHONE (540) 564-3027 • FAX (540) 564-3017

Website: [www.rockinghamcountyva.gov](http://www.rockinghamcountyva.gov)



JOSEPH S. PAXTON  
County Administrator



## ROCKINGHAM COUNTY

### BOARD OF SUPERVISORS

PABLO CUEVAS

Election District No. 1

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Election District No. 3

WILLIAM B. KYGER, JR.

Election District No. 4

MICHAEL A. BREEDEN

Election District No. 5

### RESOLUTION - NATIONAL FOREST WILDERNESS AREAS.

On motion by Supervisor Eberly, seconded by Supervisor Kyger and carried by a vote of 5 to 0, voting recorded as follows: BREEDEN - AYE; CUEVAS - AYE; EBERLY - AYE; FLOYD - AYE; KYGER - AYE; the Board adopted the following resolution:

### RESOLUTION EXPANSION OF WILDERNESS AREAS IN NATIONAL FOREST IN ROCKINGHAM COUNTY

WHEREAS, the George Washington National Forest represents a substantial portion of land area within the County of Rockingham; and

WHEREAS, the National Forest is a significant natural resource providing a diversity of recreational and extractive uses which benefit both County residents and people outside the County; and

WHEREAS, the National Forest Service has the appropriate authority to manage the forestland for multiple use and a procedure for involving the public in the determination of appropriate management methods; and

WHEREAS, through the cooperative involvement of both the National Forest Service and local County citizens, the forestland is being appropriately utilized while ensuring long-range protection of the forest resources; and

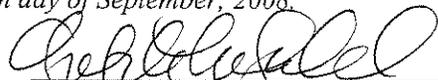
WHEREAS, it is the opinion of the Rockingham County Board of Supervisors that, at this time, designation of national forestland within Rockingham County as wilderness by the United States Congress would not increase protection of the forest resource and would severely limit public input into future management of such areas designated as wilderness;

NOW, THEREFORE, BE IT RESOLVED that the Rockingham County Board of Supervisors hereby urges that the United States Congress not designate any National Forest lands within Rockingham County as wilderness areas.

0000000000

*I hereby certify that the foregoing is a resolution adopted by the Board of Supervisors of Rockingham County, Virginia, at a meeting held on January 8, 2008.*

*Given under my hand this 18th day of September, 2008.*

  
Gretchen M. Sallah, Deputy Clerk

POST OFFICE BOX 1252, HARRISONBURG, VIRGINIA 22803

TELEPHONE (540) 564-3027 • FAX (540) 564-3017

Website: [www.rockinghamcountyva.gov](http://www.rockinghamcountyva.gov)



JOSEPH S. PAXTON  
County Administrator



## ROCKINGHAM COUNTY

### BOARD OF SUPERVISORS

PABLO CUEVAS  
Election District No. 1

FREDERICK E. EBERLY  
Election District No. 2

DEE E. FLOYD  
Election District No. 3

WILLIAM B. KYGER, JR.  
Election District No. 4

MICHAEL A. BREEDEN  
Election District No. 5

### COUNTY NOT BE DESIGNATED AS "WILDERNESS AREAS."

The Board received a resolution from the Planning Commission recommending that the Board recommend to the U.S. Congress that National Forest lands within the County not be designated as "Wilderness Areas." On motion by Supervisor Couch, seconded by Supervisor Ahrend and carried by a vote of 5 to 0, voting recorded as follows: CUEVAS - AYE; AHREND - AYE; COUCH - AYE; KYGER - AYE; HULINGS - AYE; the Board adopted the following resolution and asked that both the Planning Commission and Board of Supervisors resolutions be forwarded to Virginia's Senator Charles Robb and Senator John Warner.

### RESOLUTION NO. 15-91

**WHEREAS**, the George Washington National Forest represents a substantial portion of land area within the County of Rockingham; and

**WHEREAS**, the National Forest is a significant natural resource providing a diversity of recreational and extractive uses which benefit both County residents and people outside the County; and

**WHEREAS**, the National Forest Service has the appropriate authority to manage the forestland for multiple use and a procedure for involving the public in the determination of appropriate management methods; and

**WHEREAS**, through the cooperative involvement of both the National Forest Service and local County citizens, the forestland is being appropriately utilized while ensuring long-range protection of the forest resources; and

**WHEREAS**, it is the opinion of the Rockingham County Board of Supervisors that, at this time, designation of national forestland within Rockingham County as wilderness by the United States Congress would not increase protection of the forest resource and would severely limit public input into future management of such areas designated as wilderness;

POST OFFICE BOX 1252, HARRISONBURG, VIRGINIA 22803

TELEPHONE (540) 564-3027 • FAX (540) 564-3017

Website: [www.rockinghamcountyva.gov](http://www.rockinghamcountyva.gov)

NOW, THEREFORE, BE IT RESOLVED that the Rockingham County Board of Supervisors hereby urges that the United States Congress not designate any National Forest lands within Rockingham County as wilderness areas.

oooooOooooo

I hereby certify that the foregoing is the Resolution adopted by the Board of Supervisors of Rockingham County, Virginia, at a meeting held on May 8, 1991.

Given under my hand this 26th day of September, 2008.

  
\_\_\_\_\_  
Gretchen M. Sallah, Deputy Clerk

27 SEP 08

Maureen Hyzer  
George Washington Nat'l Forest  
Roanoke, VA 24019-3050

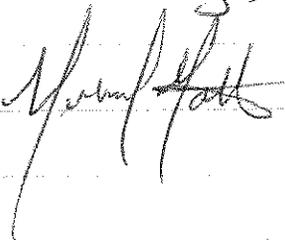
Dear Ms. Hyzer:

I am writing to provide input to The Forest Plan for the George Washington National Forest. I respectfully <sup>request</sup> your consideration for inclusion of the following:

- management of local drinking watersheds
- Protection of roadless areas
- Creation of Special Biological Areas for protection of rare species, and
- Protection of all old growth forest.

Thank you for your consideration.

Sincerely,

 Matthews

Sept 27 '88

Maureen Ayers, Supervisor  
DWNF  
5142 Valleygate Parkway  
Roanoke, VA 24019-3650

Dear Ms Ayers,

Thank you for your efforts thus far toward protecting the George Washington National Forest. Please, as you look to the future, ensure that all roadless areas in the DWNF are protected for our future generations and not allowed to be withdrawn. Our children deserve this!

Sincerely,

Margith Matthews  
1209 Bellvue Rd  
Fulwood, VA 23238

9/29/08

## COMMENTS ON GW. POTENTIAL WILDERNESS

Designated Wilderness is a valuable resource to this nation and world. The present 107 million acres contain some extraordinary examples of wilderness character. Few countries in the world can afford the luxury of designating so many acres to Wilderness.

However, The GW's 45,000 acres of designated Wilderness are probably the best quality that meets the Wilderness standard and that number is sufficient. I would not support additional Wilderness for the following reasons:

- The potential inventoried wilderness are inferior as quality Wilderness (except Laurel Fork-- But it can be managed without designation).
- Additional Wilderness will restrict forest management for fire, timber, wildlife, insect epidemics, and transmission lines.
- Wilderness restricts the wide range of recreational users who want designated trails and jeep roads and presently use these areas. Hunters will not be able to extend their range when access is closed.
- Much of the inventory lands is where the timber is becoming over mature and needs regeneration for the health of the forest and wildlife.
- Tourist and local recreational use will normally not increase with Wilderness designation nor would it be desirable in most cases.
- The Forest Service does not presently have the resources to manage the existing Wilderness as required, much less take on more.

These potential wilderness areas should be dropped from the plan And reevaluated for their proper management area role.

■

Charles  
Huppuck