From:	Rosser, John Barkley - rosserjb
To:	FS-comments-southern-georgewashington-jefferson
Subject:	comments on SVN Forest Plan 2011
Date:	Monday, October 17, 2011 5:28:08 PM

To Whom It May Concern,

I support continuing to restrict hydraulic fracturing within the forest.

J. Barkley Rosser, Jr., Ph.D.
Professor of Economics and Kirby L. Cramer, Jr. Professor of Business Administration
James Madison University
Harrisonburg, VA 22807
Former Advisor to George Washington National Forplan, 1980

From:	Kathy Selvage
To:	FS-comments-southern-georgewashington-jefferson
Subject:	Comments on GW National Forest Plan
Date:	Monday, October 17, 2011 6:45:53 PM

Dear Sir or Madem:

I appreciate the opportunity to submit just a few comments to you regarding the final plan for activites that will be allowed in the GW National Forest.

Alternative C is a far superior choice over other alternatives and much of the following explains why.

This National Forest is not only important to those who live immediately adjacent to or near the forest. This forest is important to all of the Commonwealth because we travel, visit the forest, enjoy its wildlife, and consider hunting its wildlife for enhancing our food supply and our health as this food is likely to be far better for human consumption.

Many of our national forests are already allowing activities that, in my opinion, are not a proper use of the forest, are disrespectful of its rightful place of importance, and fail to protect its future for the enrichment and well being of others to follow.

Commerce and development has its place; however, it should not be in the national forest. I approve of the ban on horizontal natural gas drilling and would indeed like to see all hydrofracking in the Forest banned. Because gas drilling can break up habitat continuity and has the potential to desecrate water quality, the forest should not be open for conventional gas drilling either.

The commercial activity of logging is of great concern as well. Minature proposed designations of wilderness areas will not help the shortage of wilderness. More carbon sequestration will be required in the future and having additional roadless areas free of logging will help us accomplish that in addition to protecting water resources that will be more and more important in the future. In addition, considering how little old-growth forests we have (very much an endangered treasure), we should be logging none of these. They deserve to be protected.

I urge you to be more protective of the Forest in your future plan. Treasures destroyed in a day cannot be restored in a lifetime. Be determine to protect them.

Thank you.

Sincerely,

Kathy Selvage
6611 Kemper Rd.
Wise, VA 24293
PH: (276) 328 1223

INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

Monday, October 17, 2011

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

RE: Draft Environmental Impact Statement and Draft Revised Land and Resource Management Plan

Dear Ms. Hyzer,

Thank you for the opportunity to provide input on the Draft Environmental Impact Statement and Revised Land and Resource Management Plan for the George Washington National Forest. This challenging task requires enormous amounts of patience to consider input from all of the different user groups. To that end we would like to express our qualified support for Alternative G and provide some insight into how the cyclists who ride in the George Washington National Forest (GW) currently use the forest and some areas where we see potential to enhance the quality of trails from both a sustainability and experiential standpoint.

Founded in 1988, IMBA leads the national and worldwide mountain bicycling communities through a network of 80,000 individual supporters, 750 affiliate clubs, and 600 dealer members. IMBA teaches sustainable trail building techniques and has become a leader in trail design, construction, and maintenance; encourages responsible riding, volunteer trail work, and cooperation among trail user groups and land managers. Each year, IMBA members and affiliated clubs conduct nearly one million hours of volunteer trail stewardship on America's public lands and are some of the best assistants to federal, state, and local land managers. IMBA has a service wide Memoranda of Understanding with the USDA Forest Service as well as many individual forest level MOUs and Partnership Agreements across the country.

For cyclists the trail is much more than access to the forest, it is one of the elements that define the experience. Every detail of the trail, from the alignment and flow to the surface and sight lines, combine with the forest surroundings to determine whether the mountain bicycling experience is one suitable for novices or experienced riders and whether it is a good or bad experience. Places that strike the perfect combination of trail and setting become cherished destinations that people travel from around the world to experience.

Mountain bikers utilize a combination of stacked loop trails and long, remote backcountry trails. The stacked loop, or hub, system lends itself to easier management because both users and trailhead facilities such as parking and restrooms are consolidated. Where the hub is located adjacent to the local community it creates a "ride from home" scenario, eliminating the need to drive, which is becoming an increasingly prized feature of any trail system. Using a hub can also provide a place to accommodate diverse cycling interests, such as gateway trails for novice level riders or directional travel trails that may be less compatible multiple uses. Backcountry trails, on the other hand, are the opportunity for riders to challenge themselves and escape civilization in wild places requiring self-support and intestinal fortitude. These epic backcountry rides are on multi-use trails, preferably non-motorized, and often involve the rider pushing or carrying their bicycles in sections due to the rugged nature of the trail and terrain.

In *Meister v. United States Department of Agriculture*, 623 F.3d 363 (6th Cir. Mich., 2010) the court held that the Forest Service was obligated to consider not just the opportunity for recreational experiences, but also the quality of those experiences. To that end it is important to understand that mountain biking has several different disciplines that fall on a gradient scale. It is also important to consider that while generally compatible with motorcycle or other motorized trail use mountain bicycling is a non-motorized activity necessitating specifically tailored management policy and practices.

The mountain bicycling experience on the GW will be primarily impacted by two provisions in the draft plan: First is the limitation of trail mileage to a net increase of three percent (3%) or less than thirty (30) miles. Secondly, the areas recommended for Wilderness designation.

Draft Plan for Recreation

Alternative G in the Draft Plan limits the net increase in trail mileage to less than 30 miles. We understand this limitation to be primarily driven by the need to have a net zero increase in the amount of trail maintenance required. We are concerned that this type of quantification at the Forest Plan level of the decision hierarchy could unnecessarily hinder trail development opportunities, foster unauthorized trail building and potentially limit trail sustainability.

Using a hard quantification such as "less than 30 miles" at this stage could limit opportunities to develop a trail system that maximizes the experiential potential in accordance with the desired conditions for a given area. This is not to say that we would like to see the whole forest littered with redundant trails, but rather that quantification could impede the process of identifying and meeting the experiential demand of what is projected to be the highest growth recreational use of the Forest.[1] While we put considerable effort into discouraging mountain bicyclists from engaging in authorized trail building, an unmet need for connectivity or a particular experience will often result in unauthorized trails. Additionally, using a numerical cap could prevent sustainable reroutes that avoid fall lines or slopes that are too steep, but add distance that quickly accumulates when measured across an entire forest.

We recommend using a more subjective standard that will be workable in the field. In conjunction with that standard we would recommend development of non-motorized trails plan consistent with recommendations from our initial scoping comments that considers the maximum trail potential and prioritizes what is needed from a capacity, sustainability and experiential standpoint. We would also recommend establishing trail stewardship agreements or other partnerships to address the need for additional maintenance resources, rather than limiting trail development over the life of the Forest Plan.

Draft Plan for Wilderness Recommendations

We were pleased to see that the Wilderness section contained an explicit statement that bicycles would continue to be permitted in Potential Wilderness and Potential Wilderness Study Areas. (Collectively, Wilderness Recommendations) Moreover, we were pleased to see that the impact to mountain bicycling was considered when making these recommendations, which is reflected in both the mapping of the management areas and the language of the plan. However, we were disappointed to see that the analysis seems to consider mountain bicycles and motorcycles together.[2]

Besides the obvious difference that bicycles are quiet, human powered recreation with less impact to trail surfaces and the surrounding environment, the experience is substantially different. Mountain bicyclists who seek out the backcountry riding experience are looking to challenge themselves, to test endurance and self reliance or to leave behind the hurried pace of everyday life. It is not to say that a backcountry experience cannot be had when shared with motorized uses, but the Forest should include some places for a pure backcountry mountain bicycling experience.

Furthermore, the plan only considers the quantity of trails that will be closed to bicycles. Many of the areas that have the highest quality wilderness characteristics, and thus are often candidates for Wilderness Recommendation are also where a single trail can be the most significant for those seeking a backcountry mountain bicycling experience. Because all trails do not provide the same experience it is important to understand the value of the trails that will be closed to ensure that the Forest still includes a good mix of available experiences.

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[1] Draft EIS p3-202

[2] Draft EIS p3-329

IMBA and the local mountain bike community were critical partners in developing the Friends of Shenandoah Mountain Agreement, and we see much of that proposal in the Draft Plan. However, a critical component of the agreement was the adjustment of the Ramseys Draft Wilderness Area Boundary to allow bike access on the entire Shenandoah Mountain Trail, a critical part of the Great Eastern Mountain Bike Trail route. As currently managed this trail is covered under a patchwork of management. As such, a trail that should serve as an arterial connector trial between ranger districts is not accessible to mountain bicycles.

Proposed Action for Monitoring

In order to ensure that the recreation goals of the Plan are being meet and sustained we request that a Monitoring and Evaluation portion of the plan include specific provisions for recreation. From a mountain bikers perspective this would include regular meetings to discuss trail conditions and management and plan for volunteer workdays or more extensive professional trail work. Regularly scheduled meetings would also foster a more collaborative partnership that would allow the Forest Service to proactively address issues before they become problems.

IMBA and our paid trail consulting team, Trail Solutions, are available for consultation on managing, designing and constructing sustainable trail systems. We greatly appreciate your efforts in to enhance outdoor recreation opportunities and thank you for accepting our comments. We look forward to continuing a productive relationship in the future. Please feel free to contact us, Frank Maguire (814) 441-7865 (frank.maguire@imba.com) or Jeremy Fancher (831) 975-4522 (jeremy.fancher@imba.com) if we can be of further assistance.

Respectfully Submitted,

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Frank Maguire
Mid Atlantic Regional Director
International Mountain Bicycling Association

_____

Jeremy Fancher
Policy Analyst/In-House Counsel
International Mountain Bicycling Association

October 17, 2011

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

SUBJECT: George Washington National Forest Draft Environmental Impact Statement (EIS No. 20110174, Draft EIS, USFS, 00) and Draft Revised Land and Resource Management Plan

Comments of America's Natural Gas Alliance
United States Forest Service Draft Environmental Impact Statement and Forest Plan

America's Natural Gas Alliance (ANGA) appreciates this opportunity to comment on the United States Forest Service's draft Environmental Impact Statement ("draft EIS") and draft Forest Plan for the George Washington National Forest ("GWNF).

ANGA is an educational and advocacy organization dedicated to increasing appreciation for the environmental, economic, and national security benefits of North American natural gas. ANGA's members include many leading, North American independent natural gas exploration and production companies. Their collective natural gas output comprises approximately 40 percent of the total annual U.S. natural gas supply.

The safe and environmentally responsible development of our domestic stores of natural gas has been and, increasingly, will be, an important component of America's energy supply and economic health. Natural gas is a clean-burning, efficient, and cost-effective fuel that offers the potential both for significantly decreasing air pollution emissions and promoting America's energy independence.

Over the past 60 years, more than one million U.S. wells have been safely produced in the U.S. using hydraulic fracturing. The Environmental Protection Agency, Ground Water Protection Council, and Interstate Oil and Gas Compact Commission have all examined the process and found it to be safe. With recent growth of hydraulic fracturing, the EPA again is examining this technique. The agency's new study is slated to be released in 2012 and we are confident it will affirm the safety of hydraulic fracturing. The natural gas community is keenly aware that with the opportunities natural gas provides comes the responsibility to be dedicated environmental stewards in the communities where we do our work. We understand that just as important as accessing this clean energy resource is making sure we put safety first.

While ANGA understands that the USFS must protect and safely develop the forest resources of the GWNF, the technology used by and the safety record of ANGA' members have proven that this essential resource can be developed in an environmentally responsible manner. The evidence does not support the USFS's sudden and unsupported proposal to ban horizontal drilling and the associated hydraulic fracturing in the GWNF. There are no data identified or included in the supporting record that would support such a step and the reference to "potential impacts" on water quality is no more than mere conjecture. Such a measure is (1) inconsistent with positions taken by

federal and state governments with respect to developing this country's natural gas resources, (2) based solely on unsubstantiated, scientifically unsupported conclusory statements, and (3) at odds with the several ongoing federal and state efforts to review the process.

The proposed ban appears to be based on conclusory statements about potential impacts that some plan drafters believe could result to ecosystem resources from horizontal drilling using hydraulic fracturing. As justification for the proposed ban, the draft Forest Plan states without support that drilling and the "associated hydrofracturing . . . may impact water quality." As a consequence, this proposed ban is not based on any evidence of identified issues nor any experience with problems resulting from horizontal drilling using hydraulic fracturing. In fact, government officials, including Bob Abbey, Director of the Bureau of Land Management ("BLM") and Lisa Jackson, Administrator of the Environmental Protection Agency ("EPA"), have stated that their respective agencies were unaware of any evidence of hydraulic fracturing adversely affecting water resources. While the draft EIS purports to assess the potential impacts of horizontal drilling using hydraulic fracturing to water, air and soil quality, the issues raised are not unique to horizontal drilling using hydraulic fracturing, and in no way explain why the USFS has proposed to ban only horizontal drilling using hydraulic fracturing.

States have actively regulated natural gas development for decades, and consistently work to update laws and regulations. The state of Wyoming developed new, protective regulations governing natural gas development. The state of Montana has updated their regulations as well. Texas has passed a new law on hydraulic fracturing, and is drafting implementing regulations as well.

The proposed USFS ban stands alone as an extreme response to issues that many states have evaluated and concluded that natural gas development can be done in an environmentally responsible manner. The USFS ban is, further, outside what others in the federal government are doing. It presupposes conclusions to the comprehensive study that EPA is doing on hydraulic fracturing more than a year before the first phase of that study will be completed. The SEAB released a 90-day report of its recommendations on development of this vital resource, and they did not recommend banning either natural gas development or hydraulic fracturing.

The draft Forest Plan and the draft EIS are inconsistent with and appear to ignore all of these efforts. Nor do the record documents explain why a ban on horizontal drilling using hydraulic fracturing is appropriate based on the numerous regulations already in place and under development. If allowed to stand, the conclusory position advanced in the draft would constitute a radical departure from the other thoughtful, science based reviews now under way by other federal and state agencies, and would set a dangerous precedent.

Developing this country's abundant natural gas resources is consistently recognized by federal agencies and experts as necessary to ensure this country's energy security, reduce greenhouse gas emissions and other air pollutants, and increase economic development and jobs. The Environmental Protection Agency states on its website that "natural gas plays a key role in our nation's clean energy future and . . . hydraulic fracturing is one way of accessing that vital resource." The Department of Energy's Secretary of Energy Advisory Board ("SEAB") Natural Gas Subcommittee recently wrote in its 90-day report that "it believes that the U.S. shale gas resource has enormous potential to provide economic and environmental benefits for the country." The New York Department of Environmental Conservation in its recently released draft Supplemental Environmental Impact Statement noted that "increased production of domestic natural gas resources . . . has dramatically altered future energy supply projections and has the promise of lowering costs for users and purchasers of this energy commodity," also finding that hydraulic

fracturing could add 55,000 new jobs in that state alone. Overall, U.S. gas consumers saved approximately $43.7 billion in calendar 2010, according to a recent study performed for ANGA by Navigant. Even the USFS has acknowledged that natural gas is a "cleaner source of energy, producing less greenhouse gas than oil or coal."

Advances in horizontal drilling and hydraulic fracturing techniques have allowed natural gas producers to access large amounts of natural gas from formations that previously have been uneconomical to exploit. The potential for developing domestic natural gas resources, especially from unconventional resources, is significant, with the Energy Information Administration ("EIA") recently estimating that natural gas from shale gas resources accounts for 862 trillion cubic feet of the 2,543 trillion cubic feet of potential natural gas resources in this country. The EIA expects this number to increase over time. Shale gas resources are also expected to supply upwards of 46% of the U.S.'s natural gas supply by 2035.

An outright ban on horizontal drilling using hydraulic fracturing would ignore those consistent science-based conclusions and be contrary to those larger policy objectives. In light of the above, ANGA respectfully argues that the proposed ban on horizontal drilling and hydraulic fracturing be excised, in its entirety, and that the draft reflect the importance of the development of this vital domestic resource, and continue the permitting as is the current practice elsewhere in the country.

Should you have any questions on these comments, please feel free to contact me at 202-789-2642 or probertson@anga.us.

Sincerely,

Peter Robertson
Senior Vice President, Legislative & Regulatory Affairs

Progress last century, Goal for the next century:
Comments on the GWNF Draft Plan

Just looking at the cover of the Draft Revised Land and Resource Management Plan of the *George Washington National Forest*, it is clear that Forest Service has made great progress in the past 100 years. The 1910 photo was taken near the end of the few decades when the best of the timber had been taken, the forests cut, stripped for tannins, burned, grazed, eroded, burned again. Even steep slopes, like those on my own land near the edge of the GWNF, were plowed for corn, grazed, gouged with deep gullies, and then, often, abandoned. The ancient forest seemed almost gone, perhaps beyond recovery.

Since the Eastern National Forests were established, as the 2010 photograph shows, large areas of these forests have made a remarkable recovery. The Forest Service, and we as a nation, can take pride in this restoration. Our main question now, as we consider the GWNF's revised plan for management, is the same as when the purchase of these forests was authorized in 1911: What are we hoping for in our rich forest resource? What are we hoping for in the next hundred years? I suggest the following three goals:

- continuing to protect our water supplies
- continuing recovery of Appalachian Forest
- continuing to manage the Forest on the basis of both public participation and scientific insights

These values are all part of the heritage of the National Forests, including their pre-history that began with early awareness of links between forest clearing, catastrophic flooding and recurrent drought, around the time of the Civil War

This awareness was followed by 50 years of congressional conflicts before the Weeks Act was passed, authorizing the purchase of damaged lands and payment for some management. Though the links between forests and good water flow were vigorously debated and denied, protection of the headwaters of rivers became the basis of the Forest Reserve Act of 1891, enabling the president to set aside public land as Forest Reserves, which were the precursors of the National Forests. It took considerable courage and foresight for our Congress to protect these lands. There was still had more timber to clear, more profits to make, and resentment of any restrictions.

Now, 120 years later, protection of our water supplies remains a major service of the George Washington National Forest: in all six of the public presentations of the Draft Revised Plan in 6 different districts in the summer of 2011, the greatest numbers of people, with the greatest intensity, expressed their concern for clean, safe water supplies, especially in the face of the prospect of hydro-fracturing in the Forest, with its acknowledged and unacknowledged dangers. The concern is that the deep injection of unknown chemicals will cause serious and permanent damage to underground water quality, and to the streams fed by the underground waters. Our most important goal for the next century is to keep the waters of the Forest clean and safe. Hydro-fracturing now joins the earlier massive deforestation as a danger to our water supply; if unidentified chemicals are pumped deep below our ground waters, it may take well over 100 years for our waters to run clear again. There is a lot of pressure for energy, no matter what effects, in this country. The GWNF Draft Plan presented this summer attempts to balance energy needs with forest protection. Much like 130 years ago, when the lumber barons found ways of plundering these mountains and leaving them bare and eroded, this present Draft Plan has a lot of loopholes to make it possible for our energy-addicted country to plunder this regrown forest again, perhaps irreparably this time. We can only hope our Congress will regain the courage to act wisely and protect our waters for the next century, too.

The Old, Original Appalachian Forests

In contrast to the loss of forest cover for our headwaters, another loss in these forests looked permanent: the old, original Appalachian forests had been cut and burned so heavily, that the old, Great Forest - uncut, un-cleared, and un-burned - seemed to be gone for good. But there are stories of old, uncut forests being saved by some combination of ingenuity, persistence and love, or the wreck of a lumber train, or bankruptcy; tales of heroic acts of bureaucracy, of generosity, and foresightedness saving some intact forests, historically uninterrupted, forests with qualities that are just not there in the new forests, even in the mature, 90-year old secondary forests. And now there is another set of stories, new stories of ancient, uncut forests being discovered, in large stands and small, where none of these old forests had been known to remain. Ancient forests, primeval forests, virgin forests, primary forests, or, as we often call them, old-growth.

Since the 1970s, numerous forests, uncut and un-cleared and un-burned, began to be rediscovered in many parts of the East, including the George Washington National Forest. Forests on steep slopes and ridges that had been inaccessible to saw-mills during the lumber boom years, and sometimes the inaccessible cove forests on the slopes below; parts of farm woodlots; forests on large estates that had been protected by their owners; forests scheduled for cutting, with tracks being laid for lumber trains when the lumber company had gone bankrupt; and other forests, large, medium and small, that had somehow escaped cutting, had survived, had continued to thrive, and have reappeared. Eastern old-growth was reappearing. There is much more existing old-growth in the East - thousands of acres more - more than anyone would have estimated 30 years ago. How many thousands of acres are still left? We have no idea.

These recently discovered forests represented unexpected and poorly understood resources: historical, scientific, ecological, spiritual, genetic, psychological, new and unexpected carbon-sequestration sinks, perhaps reservoirs of forest health or human medicines. We don't know yet. Possibly with symbioses that are missing in forests that have been logged and cleared and burned, symbioses that may be important to the continuing recovery of near-by forests. We don't know yet. With unusual abilities to purify water and the capacity to store more carbon than younger forests: this has been recently discovered, but we still don't know how this old and newly discovered carbon-sequestration sink - an apparently huge carbon sink - will provide an environmental service we badly need. With their continuity with the forests of the distant past, these forests represent possibilities of recovery of what was lost and now is found.

The importance and the unknowns of the newly discovered old-growth forests were soon apparent to the Forest Service. At the direction of the Forest Service Chief Dale Robertson in 1989, teams of Forest Service scientists were assembled in each of the eastern regions to develop guidance for the old-growth in this region. The George Washington National Forest participated in the development of the Southern Regional *Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region (the Report of the Region 8 Old-Growth Team)*, which, after extensive consideration and the approval of its draft, was published in June, 1997, as a major step forward, as the sub-title presents, toward "preserving and restoring old-growth communities in the National Forests."

Guidance

The GWNF Draft revised Plan states repeatedly that it is following the *Guidance for Conserving and Restoring Old Growth Forest Communities on National Forests in the Southern Region*, in its management plan for old-growth in the Forest. I was amazed to read this. While I was trying to understand the Draft Plan, the Draft EIS, and the Appendices, I had read the *Guidance* myself, and I wondered if we had been reading the same *Guidance*.

In the *Guidance* I had read, the first, basic requirement for conserving and restoring old-growth seemed to be to **identify** the existing stands of old growth in the Forest, **evaluate them in the field** using the standards developed in the *Guidance* and **inventory** them, as this information is essential to effective forest management; to make this information available to the public (as required) and as the most fundamental basis for our scientific understanding of Eastern old-growth forests.

Because the rediscovery of old growth in the East is recognized as important to the continuing conservation and restoration of the Forest, the *Guidance* specifies that all large, medium-sized and small patches of old-growth in the Forest should be identified and inventoried during the development of this revision of the Plan, as I understand it, and specifically, to enable the public to effectively participate in the development of the Plan, this updated inventory of old-growth, according to the *Guidance,* was to be completed and presented to the public before developing management alternatives for old-growth, before writing a draft plan, presenting it, and opening it to public comment. None of this seemed to have happened. This Plan made me curious; I wanted to explore some of the GWNF old-growth stands; I looked for a list of representative old-growth stands, identified by the GWNF and verified in the field; I couldn't find any inventory or guide to the old-growth stands in this plan; and when I asked where to find the old-growth inventory in one of the public meetings about the plan, I was told simply, possibly with some embarrassment, "There isn't one."

Quandary

The Draft Plan for the GWNF seems to be stuck in a quandary in respect to the identification, evaluation and care of our old-growth forests: on the one hand, the GWNF considers old-growth so rare that it's hard to identify, inventory, or describe. As stated in many different ways throughout the Draft Plan, "Nearly all the lands that became the George Washington National Forest had been cut over at least once before becoming National Forest System lands;" "Fundamentally, little true old growth exists on the GWJNF."

On the other hand, the GWNF maps show enormous amounts of old-growth, many stands, enough that a lot of them (marked in bright green) are "suitable" for logging. Summary tables and descriptions, too, sound like we have abundant old-growth: "151,268 acres in OGFT 21" the dry-mesic oak forests (Draft EIS, B3 p. 3-148).

Even more puzzling, true old growth seems to be simultaneously very rare and abundant. If true old-growth, old-growth that meets all four of the standards of the *Guidance* is very rare and hard to find, why would we even consider logging it? As stated in Alternative G, the "preferred alternative" presented in this Draft Plan, the intention is to log "**about 2,400 [acres] in OGF type**

21," the dry-mesic oak old-growth forests, during the next ten years, (Draft EIS B3 Old Growth p. 3-147).

True old-growth forests may be extremely rare in the GWNF and throughout the Southeast, as stated. Then why not inventory the ones that are left?

Old-growth was rare 30 years ago, and it is still rare. But many unknown old-growth stands have been rediscovered. The *Guidance* was developed because numerous previously unknown old-growth stands were being discovered throughout the East. The intention is to distinguish, by clear and acceptable Forest Service standards, between these two distinct groups of old-growth with continuity with ancient, pre-disturbance forests. The established standards are clear and simple: "The operational definitions established four criteria which had to be met before a stand would be considered 'existing' old growth: (1) AGE - minimum age in the oldest age class; (2) PAST DISTURBANCE - no obvious human-caused disturbance that conflicts with old growth characteristics for that type; (3) BASAL AREA -minimum basal areas of stems (40 ft^2/acre in dry-mesic oak forests) and (4) TREE SIZE - a minimum diameter at breast height (d.b.h.) of the largest trees (≥20" in dry-mesic oak forests)."

We need field inventory, don't we?

The definitions of old-growth used in formulating preliminary identifications of possible old-growth do not look at these standards; and they blur a distinction that is important to forest scientists, and seems to be needed for intelligent management of both remaining old-growth (which we can call "true old-growth" and mature secondary forests - forests that were harvested, and perhaps farmed, 150 years ago and abandoned before the National Forests were established. Until and unless we know better, we should assume that there may be important environmental differences that may have important implications for the value of old-growth and for future management decisions. And, until we know better, shouldn't we assume these old-growth remnants are valuable?

For example, it has been shown in many forests that several components of true old-growth - fungus, lichens, salamanders, and diverse understory annuals, for example, may be extremely vulnerable to exposure to the light, heat, winds, desiccation and other disturbances that come with logging, may disappear from cleared forest sites, and may take over a century to become re-established, if they ever do.

Some of these factors that are absent or rare in severely cleared secondary forests may have protective qualities important to the health and vitality of forests - mycorrhizae provide access to often-rare phosphorus and may protect from acidic aluminum soils; both fungus and salamanders provide important nutrition to wildlife in many old-growth forests - in the dry mesic forests of the GWNF? I know nothing of the understory annual plants of the Appalachian old-growth forests; but I cannot imagine that none of the plants present in true old-growth forests and absent from mature secondary forests are valuable, perhaps essential components of forest health, nutrition for wildlife, Some under-story trees of the old-growth Appalachians may produce valuable medicinals like the fairly recently identified taxol in the PNW; this is not totally a wild guess; the understory of old-growth forests is a challenging environment, which, over the course of millenia, provides advantages to species that evolve protective qualities. The same may be true of several other old-growth structures, such as large woody debris, both standing, fallen, and in creeks and rivers. The high organic matter content in many old-growth soils protects plants from acidity and high aluminum

content in many forest environments; is this a significant protective feature in old-growth stands, in contrast to mature secondary stands in otherwise similar soils?

Why? and How?

Why is it so hard for the GWNF to evaluate possible old-growth stands and formally designate possible old-growth as "old-growth" in an inventory, as required by the *Guidance,* when stands, **or parts of stands,** meet the four standards for old-growth that were set by the *Guidance*? Identifying "possible old-growth" was not meant to be an alternative to developing an inventory of existing old-growth, as described in the *Guidance.* A better question would be: how can the GWNF, with the help of the *Guidance,* of this evolving Forest Plan, facilitate the evaluation of identified "possible old-growth" stands and designate the appropriate stands **or parts of these stands as "existing old-growth", "true old-growth" unlogged old-growth, or old-growth with apparent continuity with the primeval Appalachian Forest?**

1. What public participation is needed? How can this be enabled, facilitated, and utilized for the more effective conservation of remaining existing old-growth with continuity?
2. What knowledge resources are needed?

May I suggest several steps to include in the Plan, for immediate action:

1. Enter all old-growth stands with field verification in a *Working Inventory* and make it available for public input

2. Get the assistance suggested in the Guidance to help provide scientific basis, historical insights, and community collaboration

3. Make a working **List of Representative Old-Growth Forests.**
Since the dry-mesic oak forest is most abundant in the GWNF and the dry-mesic oak old-growth is the most abundant old-growth, it would be most helpful to have a list of field-verified dry-mesic oak old-growth forest stands for comparison; it would be useful, too, to see "possible" old-growth stands that have been field-tested and found not to be old-growth, perhaps by reason of their disturbance history. This would be educational, and would also facilitate the public input required by the *Guidance*).

4. Identify the qualities that distinguish dry-mesic oak old-growth stands from dry-mesic oak mature secondary growth? and include indicators of these features. What MIS are being considered for distinguishing old-growth from mature secondary growth dry-mesic oak forests? fungus? lichen? salamander? understory herbaceous annuals?

Conclusion: Old-growth forests, a new resource

Certainly, I have not experienced the Appalachian Forest that was thought to have been completely logged and burned a century ago; and I thought that was impossible. It now seems that there may be enough continuously forested patches to be cores for recovery of most of the "missing parts:" whatever fungus, lichens, amphibians, understory flowers we don't even realize are needed may still be there, as they were one or two centuries ago. Based on rediscovery of what is left, recovery of much of that old forest may be possible. Shouldn't we celebrate this rediscovery and use it as the basis for the development of our future forests?

Respectfully submitted, with appreciation for your efforts,

James A. Bryan, PhD

From:	Brett McGee
To:	FS-comments-southern-georgewashington-jefferson
Subject:	Brett McGee-Pending Revision Comments
Date:	Monday, October 17, 2011 5:42:11 PM

Maureen Hyzer, Forest Supervisor

I am submitting my public comment on the pending George Washington Plan Revision-George Washington Jefferson National Forests. I am offering my perspective as a 21 year old college student at Christopher Newport University, whose family owns property bordering the national forest.

I believe that Alternative F offers the maximum public benefit by balancing competing interests. It allows rational utilization of natural gas and timber resources that are vital to our country's economic and energy needs. It permits development of wind energy as an alternative energy source. These uses are controlled by focusing on the most important objectives of the plan revision: the preservation of the old growth forest and the restoration and maintenance of native ecological areas.

Alternative F increases recreational use of the forest. Counter-intuitively, increased but controlled recreational use offers the best insurance against future destruction of this national treasure. Few of my fellow CNU students are familiar with the George Washington National Forest. They are more "aware" of the Amazon's rain forests and are very much in favor of protecting them. By allowing increased opportunity for the public to interact with the George Washington National Forest, awareness and support for our natural treasure will grow.

As I previously mentioned my family owns land bordering the national forest. Alternative F will decrease the value and our enjoyment of our property, as it appears to be located in a proposed logging area. In spite of this, I believe that Alternative F best fulfills the needs of the American public.

Brett McGee
CNU 2012

From: JELoesel@aol.com
To: FS-comments-southern-georgewashington-jefferson
Subject: CTF comments on GWNF draft
Date: Monday, October 17, 2011 5:23:05 PM
Attachments:
Appendix E COMMENTS ON GWNF ISSUES.doc
Appendix M COMMENTS ON GWNF ROS MAP.doc
Appendix N COMMENTS ON 3-25-10 letter (corrected).doc
Appendix W vilsack.pdf
Appendix A GWNF Plan Revision Comments 5.doc
Appendix B CTF to GWNF 02-21-10.doc
Appendix C CTF to R-8 02-22-10.doc
Appendix D COMMENTS ON GWNF ALTERNATIVES.doc
Appendix F COMMENTS ON GWNF DRAFT AMS.doc
Appendix G COMMENTS ON GWNF PW ANALYSES.doc
Appendix H COMMENTS ON GWNF MIS.doc
Appendix I COMMENTS ON DRAFT PLAN.doc
Appendix J COMMENTS ON GWNF PLANNING CRITERIA.doc
Appendix K COMMENTS ON GWNF NICHE.doc
Appendix L COMMENTS ON GWNF SUITABLE USES.doc
Appendix O COMMENTS ON 4-19-10 meeting.doc
Appendix P Comments on GW planning.doc
Appendix Q Loesel_answers_0715.docx
Appendix R Loesel questions re.docx
Appendix S Loesel_answers_Q1_through_42_2011_0804.docx
Appendix T CTF to RF 8-07-11.docx
Appendix U CTF to RF 8-27-11.docx
Appendix V Loesel_answers_Q43_through_89_Final.docx
Appendix X PlanningCriteria.docx
COMMENTS ON DRAFT GWNF PLAN AND EIS.docx

The comments and attachments from the Citizens Task Force on National Forest Management are attached.

James E. Loesel, Secretary CTF

From:	Jessica Martinkosky
To:	FS-comments-southern-georgewashington-jefferson
Subject:	I support the ban on horizontal natural gas drilling
Date:	Monday, October 17, 2011 5:16:41 PM

Dear planners,

I'm writing in support of the continued ban on horizontal natural gas drilling, at least until things like cleaning the discharge water, the cost versus the actual value of the product and radioactive water treatment, among other things, can be more clearly handled in an environmentally safe way.
The hydrofracking process can adversely affect the GWNF in a number of ways -
20-40% of the fracking water remains buried deep underground after the process is complete and the US is already suffering from water shortage problems;
safe storage, reuse, treatment and disposal of the toxic and potentially radioactive water have not been thought through at all;
pumping the toxic water back underground is not an actual storage/disposal solution;
we don't know how much surface and drinking water might be contaminated;
water doesn't stay in one place, it moved under and through many different states and bodies of water - that's a lot of people/wildlife/other industries/etc. to be taking responsibility for;
the number and location of trees cut down for the drill rigs can cause mudslides, erosion, wildlife habitat problems, etc.;
no one seems to be in control of regulating this practice - we certainly can't count on oil/gas/etc. companies to just "do the right thing," just look at the giant oil spill in the Gulf of Mexico.

Hydrofracking may ultimately be a viable solution for natural gas extraction (but maybe not in the GWNF), but not before many, many questions are acceptably answered and the possible dangers are thoroughly studied.
Don't hurry into something of this magnitude without thoroughly analyzing all possible consequences.
Please support the ban on horizontal natural gas drilling in the GWNF and other locations in Virginia.

Sincerely,
Jessica Martinkosky
Bridgewater, VA

Jessica Martinkosky
jmartinkosky@yahoo.com

From:	Rebecca Driver
To:	FS-comments-southern-georgewashington-jefferson
Subject:	George Washington National Forest Plan
Date:	Monday, October 17, 2011 7:14:48 PM

I support the ban on horizontal natural gas drilling. Thank you for your attention.
Sincerely, Rebecca V. Driver, Rockingham County, Virginia

VIRGINIA FOREST PRODUCTS ASSOCIATION

220 East Williamsburg Rd. • P.O. Box 160 • Sandston, Virginia 23150-0160
Telephone: (804) 737-5625 • FAX: (804) 737-9437 • E-mail: vfpa@att.net

Comments Regarding Draft Revised George Washington National Forest Plan

Provided by: J. R. (Randy) Bush, CAE
VFPA President

The Virginia Forest Products Association (VFPA) is pleased to submit comments on the George Washington National Forest Draft Revised Plan as proposed in April, 2011.

ABOUT THE ORGANIZATION:
VFPA is a state trade association serving the Commonwealth's 25+ billion forest products industry, and 2008 marked our 50th Anniversary providing support to our membership. We currently have more than 200 companies representing a broad range of facilities, including lumber mills, pallet plants, wood treaters, timber harvesters, and associated organizations. While our membership includes companies as large as Fortune 500 entities, the overwhelming majority of our group could be best characterized as family businesses, and their activities cover all areas of the Commonwealth.

COMMENTS:

- VFPA appreciates the extensive data provided by the Forest Service in formulating their Draft Plan. This information was extremely helpful in analyzing the Draft and developing appropriate comments. VFPA also appreciates the time Forest Service personnel provided in support of the numerous stakeholder facilitation meetings *(even though the meetings were not actually conducted by the USFS)*.

- While the independent effort of many diverse stakeholders to work towards a consensus view of Forest activities did not achieve the success many had hoped, VFPA still acknowledges the efforts of the many organizations to work towards common goals. We hope this collaborative effort will continue.

- VFPA agrees with the Forest Service's proposal to increase of the amount of acreage suitable for timber harvesting. While it concerns us that a majority of GW land is still not classified as suitable for harvesting, the increase included in the Draft Plan is a step in the right direction for more flexibility in meeting the many challenges of the Forest.

- VFPA feels the timber harvest goals in the Draft Plan *(i.e. 1,800 - 3,000 acres / year)* should be increased to at least 1% of the total acreage identified by the Forest Service as suitable for harvesting *(which would equal approximately 4,390 acres/year)*. This would provide a 100 year rotation on these identified acres ... an appropriate level for providing sustainability and forest products for local mills, as well as helping to achieve a more desirable balance of early successional habitat *(versus the over-abundance of mature habitat currently on the GW)*. It should be added that on a total GW Forest basis this increased harvest level would still average out to a rotation cycle of well over 200+ years ... well beyond the typical mortality of native species.

- As stated above, VFPA has concern that the Draft Plan does not adequately address the problems of a severe lack of diverse habitat in the GW, and particularly early successional forest habitat. Efforts should be made to provide more opportunities, through harvesting as well as other means, to start the process of developing more diverse habitat. This will help encourage wildlife and the associated recreational

opportunities that depend on this type of habitat.

- The National Forests were created with a "multiple-use" mandate ... which included providing timber and other wood products, wildlife habitat, recreation, watershed protection, and many others. This mandate is a key area that distinguishes these public lands from National Parks and similar designated lands. We feel recent GW Plans have abandoned this goal and are hoping the new Plan, when adopted, will return the GW towards embracing a true "multiple-use" concept.

- As we are continuing to see the challenges caused by dependence on foreign oil, the use of renewable energy available on a domestic level is showing greater promise. While energy conservation is certainly important, studies have shown that energy conservation alone will not meet societal needs in the future, particularly if foreign sources of oil and gas are restricted. The GW Plan should help contribute to the goal of renewable energy production and support by providing both biomass for energy generation and siting options for wind development. The latter is particularly important since many optimal wind sites are located on National Forest lands.

- We feel that the draft plan does not sufficiently address all facets in support of the local manufacturing economy. The level of harvesting in the Plan isn't even sufficient to keep just one small, family owned sawmill in production. What is even more disturbing is the current mortality of the timber resource is much greater than the amount of removals in the GW, which could easily contribute to a greater harvesting level. Any new Plan should more adequately reflect the economic realities of supporting the local timber dependent economy.

- A portion of our membership owns land adjacent to National Forest lands. We feel it is important for any Plan to recognize the unique responsibility of being a "good neighbor" to these adjacent landowners. Policies such as providing adequate access for fire prevention and suppression, forest insect and disease control, and wildlife management are necessary to help control and/or prevent any problems from these areas to spread to adjacent landowners.

- In our mind, a key purpose of the National Forests is to provide as many benefits as possible to the citizens of the U.S. Sadly, many of these benefits cannot be realized without sufficient access to the land of the National Forest. The considerable amount of Wilderness and Roadless areas being discussed locks out most of the citizenry from access for hunting, fishing and other recreational uses, timber management, as well as putting the Forest in jeopardy by restricting adequate response to fire, destructive insects and disease, as well as invasive species.

- Until a more equitable ratio of harvesting and related active management techniques are utilized, we are not in a position of supporting any additional Congressional designations. We hope this inequity will be addressed in the new Plan and, if so, we will be happy to revisit our policy of opposing any future Congressional designations.

Thank you for your consideration of our comments. If we can provide any additional information, please don't hesitate to contact us.

From: johnvcc@gmail.com on behalf of John Eckman
To: FS-comments-southern-georgewashington-jefferson
Subject: GWNF comments from Valley Conservation Council
Date: Monday, October 17, 2011 8:43:40 PM

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

Dear Ms. Hyzer,

Valley Conservation Council, a private, nonprofit land trust based in Staunton and supported by over 500 member households, appreciates the opportunity to comment on the forest plan. Our service area encompasses 11 counties in Virginia west of the Blue Ridge, from Frederick and Warren in the north to Alleghany and Botetourt in the south. Every county we work in has some portion of George Washington National Forest land.

While VCC generally focuses on private land conservation, we are compelled to comment on this draft plan because several major issues impact conservation values that will have an effect on resources beyond the Forest.

We have worked diligently with many partners for the last 21 years to protect streambanks, fence out cattle, and improve water quality on private lands downstream from the GW. Thus you can imagine our concern with potentially harmful practices such as hydrofracking in upland areas. VCC supports the plan's prohibition on horizontal drilling, both to ensure the continued protection of water resources and to avoid the high traffic and industrial development that would follow shale gas development throughout the impacted forest areas and adjacent lands.

Our organization is not against drilling in general. We have held conservation easements that will allow drilling in certain areas within certain limits; however, we believe any use with potential for such large-scale impacts that wide-spread vertical gas drilling might have should be thoroughly studied beforehand. Knowing how much our Shenandoah Valley communities depend water from the Forest, we would also support extending a ban on vertical drilling in priority watersheds and drinking water areas. Similarly, drilling should not be allowed to impact the most scenic areas, prime recreational areas, or more sensitive natural areas.

VCC takes a "green infrastructure" approach to prioritizing areas that provide ecosystem services for permanent conservation. With this in mind, we hope the forest will identify all areas that supply drinking water to communities and encourage minimally100 foot buffers on those streams and reservoirs. These drinking water areas should be considered priority watersheds. All priority areas should have clearly defined standards for their protection, such as limits on road construction.

We do not believe the case for developing industrial wind energy plants is logically very strong, particularly considering the impacts

these facilities might have on sensitive areas and views. VCC supports the ban on industrial wind development in sensitive areas, along ridgelines, and in the more remote backcountry areas. Likewise, industrial energy development--wind or otherwise--is inappropriate for natural heritage areas and watersheds that provide drinking water. The ban on wind development should be extended to these areas.

We applaud the Forest Service for listening to the communities most impacted by decisions about the GWNF. Thank you for the opportunity to share our concerns and suggestions.

Sincerely,

John Eckman

--
John Eckman
Executive Director
Valley Conservation Council
www.valleyconservation.org

540.886.3541 (office)
540.810.2258 (cell)

Oct. 17, 2011

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

Dear Supervisor Hyzer,

Please accept my comments on the draft Land and Resource Management Plan and draft Environmental Impact Statement for the George Washington National Forest (GW), which were issued in May, 2011.

Overall Comment: The highest and best long term use of the lands of the GW National Forest is for its current and potential (is allowed to revert to old growth forest) ecological and recreational purposes. Any short, or even intermediate, term benefits that could be realized, in terms of jobs, profits to businesses, and revenues to various levels of government will prove small in comparison to the much longer term, multi-faceted societal benefits provided by mature, healthy, self-sustaining large blocks of forest ecosystems. (Contrary to recent assertions in the local news media, human intervention is not needed to ensure the ecological health of old growth forests. What may seem like a ―decaying", ―sick" forest to someone who sees a forest solely in terms of board-feet of timber, can proved unique benefits to a host of plant and animal species that thrive only on climax forests.)

Roadless, Wilderness, and Special Biological Areas:

The GW is one of the very few places in the eastern United States where large areas of relatively undisturbed, mature forest still exist. These forests and the remote settings they provide must be protected. In addition to the public benefits they provide (clean air & water, unique recreation opportunities, etc.), many wildlife species that need large geographic areas (e.g., black bears, bobcats, raptors) or habitat conditions found here (e.g., forest breeding birds, salamanders) depend upon these special habitat areas.

The draft plan identifies 372,000 acres of ―potential wilderness area", or PWA. Prohibiting timber sales and new roads in the 242,000 acres of the PWA (the inventoried roadless areas) is a very positive and important step. However, the draft plan does not give the same protection to 80,000 or more acres of PWA. The entirety of all the PWA should be protected from timber sales and road construction.

Creating wilderness study areas (WSA) is an excellent means for protecting these large, remote forests. I am disappointed in the meager recommendations for WSA in the draft plan. Each of the four areas recommended are important, but three need to be increased in size. The 9000 acre recommendation for Little River is a fraction of the 30,200 acres in its PWA. Similarly, the 5000 acre recommendation for Rich Hole Addition should be increased to protect the 12,165 acre PWA, and the 6000 acre recommendation for Ramsey's Draft Addition should be increased to protect the 19,072 acre PWA.

Just as importantly, many other areas of the GW are very worthy of WSA designation. No wilderness exists in the Lee RD, and part of the Big Schloss PWA should become WSA. Several other areas in the North River RD should become WSA, including Beech Lick Knob PWA and many PWA on Shenandoah Mountain. Laurel Fork in Warm Springs RD is a truly unique and special place deserving to be WSA.

I am also concerned about rare and uncommon species and natural communities in the GW. Special Biological Areas or similar designations should be assigned to all areas, in their entirety, that have been recommended for protection or special management by the Virginia Division of Natural Heritage.

Timber Harvest - Annual timber harvest levels in the GW have generally declined since the current plan was completed in 1993. This is a welcome trend. I believe the draft plan's objective for annual timber harvest should reflect the most recent harvest levels (approximately 610 acres in 2010), and be lowered considerably from the recommended range of 1800-3000 acres/year.

Energy:

Wind Energy – The mountain ridges of the George Washington National Forest are flyways for birds and bats and are home to many rare species and Special Biological Areas. The huge surface areas—clearings, platforms, roads, and transmission lines—necessarily cleared and developed for industrial scale wind generation would irreparably fragment and destroy sensitive habitats and our beautiful mountain vistas. Industrial wind energy should not be allowed in the George Washington National Forest.

Gas and Oil Extraction – Making more oil and gas leases available in the George Washington National Forest would liely lead to dangerous impacts to water quality on the forest. The draft plan allows standard oil and gas leasing, at least in some form, on roughly 994,000 acres, or 93% of the forest. If leasing of at this scale were to take place, accompanying drilling pads, access roads and pipeline corridors would fragment existing blocks of habitat provided by the National Forest to a degree that would greatly diminish their ecological, not to mention their recreational value. The forest should not make any further leases available and existing leases should be removed from lease availability when they expire.

Biomass Incineration – Using our standing forests as a fuel source for biomass incinerators and electricity generation is an incredibly bad idea. Because of the huge volumes of fuel—trees—and water necessary and the large amount of air pollution—fine particulates and CO2—that accompany biomass incineration, the George Washington National Forest should not allow timber sales that fuel biomass incinerators.

In dealing with the effects of climate change, standing forests and soils are more valuable as carbon sinks than in using forest resources as fuel or as a source of renewable energy. Please make necessary changes so that the Final Land and Resource Management Plan for The George Washington National Forest does not allow for fuel for biomass incineration, industrial wind energy or further gas and oil leases on the forest.

Water Resources:

I am glad to see the increased attention on public drinking watersheds and water resources in the draft plan when compared to the current plan. I believe more protective measures are needed though. There should be specific management objectives for watersheds that provide drinking water to cities and communities near the forest. The desired conditions for these watersheds in the draft plan are too general to be useful.

Identifying priority watersheds seems to be a good concept, but the draft plan does not describe how or why the watersheds were selected. Less than a third of the acreage in local drinking watersheds are included in the priority watersheds. This seems to lessen the importance of protecting these drinking watersheds.

Riparian areas in the priority and drinking watersheds deserve special attention. Riparian zones in these areas should be wider than 100 feet along perennial streams and 50 feet along intermittent streams specified by the draft plan forest-wide (on level and gently sloping ground). These widths should be tripled to improve water quality and aquatic habitat and provide riparian habitat for many species (e.g., salamanders, turtles) that use these special areas.

On sloping lands, the draft plan requirements are less stringent than the Virginia Best Management Practices. State BMPs call for streamside management zones along Municipal Water Supplies (including both perennial and intermittent streams) to be 150 feet wide where the slope of the ground is 11-45%, and 200 feet wide where the slope exceeds 45%. At a minimum, the riparian area widths in priority and drinking watersheds of the GW should meet these state BMPs.

Sedimentation is a big threat to water quality everywhere, including the GW. Yet, sedimentation is not directly measured or monitored under the draft plan. Measuring sedimentation in strategic locations and waterways will complement the macroinvertebrate sampling in streams and should be part of forest management.

I am very glad to see that road decommissioning is included in the draft plan. Road closures will help decrease sedimentation while improving water quality, aquatic and terrestrial habitat, and restoring forest health. I believe the 160 mile target for road decommissioning during the first decade of the draft plan should be increased.

Economic Analysis:

Budget – The current timber program on the George Washington National Forest is costly because of the large expense in administering the program. Virtually all timber sales are ~~b~~elow

cost", costing the US taxpayers more money that the sales recoup. The George Washington National Forest Plan should be as cost effective as possible and have the lowest possible budget while maintaining existing ecological and recreational resource values.

Ecosystem Services – The economic analysis on the George Washington National Forest should include a full cost/benefit analysis of ecosystem services. Economic benefits should include clean water, improved air quality, soil stabilization, carbon sequestration, and improved recreational value. Costs should include impairments to air quality and visual quality, acres of species habitat degraded, soil compacted, land infested with non-native invasive species and water quality diminished. All forest plan alternatives should have this valuation and net public benefits should be compared at both the beginning and over the full 15 year life of the plan.

Alternative C - As presented in the Draft Environmental Impact Statement, Alternative C has the lowest budget cost of all alternatives. It maximizes net public benefits and protects all resource values in the long term instead of liquidating them in the short term. For this reason, I request that you adopt Alternative C as the Preferred Alternative and as the Final Land and Resource Management Plan for the George Washington National Forest.

Thank you for the opportunity to comment on the draft plan.

Sincerely,

Your name & address