

**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

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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

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Dear Sir or Madem:

I appreciate the opportunity to submit just a few comments to you regarding the final plan for activities 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



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.

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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.<sup>1</sup> 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.<sup>2</sup>

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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<sup>1</sup> Draft EIS p3-202

<sup>2</sup> 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 trail 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 met 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](mailto:frank.maguire@imba.com)) or Jeremy Fancher (831) 975-4522 ([jeremy.fancher@imba.com](mailto: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

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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](mailto:probertson@anga.us).

Sincerely,

A handwritten signature in black ink, reading "Peter V. Robertson". The signature is written in a cursive style with a large, stylized initial "P".

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 OGF 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<sup>2</sup>/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

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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:** [JLoesel@aol.com](mailto:JLoesel@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](#)

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

James E. Loesel, Secretary CTF

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

March 20, 2007

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

Re: George Washington Plan Revision

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

CHAPTER 1 Report Purpose

General Comments:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## CHAPTER 3 Evaluation of Existing Issues

### ISSUE 1 Biodiversity

#### A. Fragmentation

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

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

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

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

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

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

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

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

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

## B. Old Growth

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

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

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

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

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

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

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

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

#### C. Conversion

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

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

#### D. Riparian Areas

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

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

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

E. Management Indicator Species (other than TES):

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

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

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

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

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

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

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

F. Threatened, Endangered, and Sensitive Species.

The CER recommends the following change on page 53:

*C-1. Modify the Forest Plan by:*

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

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

#### G. Unique Natural Communities

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

*C-1. Modify the Forest Plan by:*

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

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

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

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

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

## Issue 2 Below Cost Timber Sales

According to the 1993 GW Plan:

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

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

### A. Efficiency of Timber Sale Program

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

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

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

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

## B. Rural Development

The CER recommends the following change on page 57:

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

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

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

## C. Suitability (Review)

The CER recommends the following change on page 59:

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

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

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

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

#### D. Allowable Sale Quantity

The CER recommends the following change on page 61:

*C-1. Modify the Forest Plan by:*

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

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

#### E. Salvage

The CER recommends the following change on page 63:

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

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

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

### Issue 3 Forest Access

#### A 1. Forest Roads in Wildlife Management Areas

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

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

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

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

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

## A 2. System Roads Across the Forest

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

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

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

## B. Licensed OHV Use

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

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

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

## C. Non Motorized Trails

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

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

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

#### D. Access for Persons with Disabilities

The CER recommends the following change on page 73:

*C-1 Modify the Forest Plan by:*

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

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

Comment: We concur with these proposed changes.

#### Issue 4 All Terrain Vehicle Use

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

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

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

#### Issue 5 Roadless Area Management

##### A. Existing Inventoried Roadless Areas

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

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

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

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

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

*C-3. Modify the Forest Plan by:*

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

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

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

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

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

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

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

#### B. New Potential Wilderness Area Inventory

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

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

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

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

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

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

#### Issue 6 Special Management Areas

##### A. Wilderness

The CER recommends the following change on page 85:

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

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

#### B. Wild and Scenic Rivers

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

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

#### C. Important Scenic and Recreational Areas

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

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

#### Issue 7 Aesthetics

The CER recommends the following change on page 90:

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

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

#### Issue 8 Vegetation Manipulation

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

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

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

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

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

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

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

The CER recommends the following change on page 91:

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

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

An ash tree initiative should be proposed

## Issue 9 Resource Sustainability

### A. Ecosystem Management

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

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

### B. Extirpated Animal Species

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

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

### C. Soil Productivity

The CER recommends the following change on page 94:

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

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

#### D. Water Quality

The CER recommends the following change on page 100:

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

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

#### F. Herbicides

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

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

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

#### G. Fire

The CER recommends the following change on page 105:

*C-1. Modify the Forest Plan by:*

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

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

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

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

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

#### H. Air

The CER recommends the following change on page 107:

*C-1. Modify the Forest Plan by:*

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

*b) Adopting as guidelines the following Jefferson Plan standards:*

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

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

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

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

## Issue 10 Minerals and Energy

### A. Federal Minerals

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

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

### B. Groundwater and Karst

The CER recommends the following change on page 111:

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

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

### C. Private Mineral Rights on Public Lands

The CER recommends the following change on page 112:

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

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

### D. Geologic Hazards

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

*C-1. Modify the Forest Plan by:*

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

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

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

#### E. Wind Energy Development

The CER recommends the following change on page

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

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

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

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

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

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

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

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

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

## Issue 11 Forest Pests and Invasive Species

### A. Population Control

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

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

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

### B. Intervention Treatments

The CER recommends the following change on page 122:

*C-2. Modify the Forest Plan by:*

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

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

Comment: See comment under 11A. above.

### C. Silvicultural Practices

The CER recommends the following change on page

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

Comment: See comment under 11A. above.

### Issue 12 Adequacy of the Revision

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

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

### Issue 13 Mix of Goods and Services

#### A. Developed Recreation

The CER recommends the following change on page 127:

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

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

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

## B. Dispersed Recreation

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

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

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

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

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

## C. Wildlife

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

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

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

*e) Adopting and modifying Jefferson Revised Plan Objectives 8.01, 12.02, 12.03, 12.04, 12.05, 13.01, 18.01, 18.02, and 18.03.*

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

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

*h) Increasing the prescribed burn objective.*

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

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

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

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

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

#### D. Land Ownership

The CER recommends the following change on page 136:

*C-1. Modify the Forest Plan by:*

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

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

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

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

#### E. Special Uses

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

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

#### F. Grazing

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Robert H. Giles, Jr.

James E. Loesel

Cc: Chuck Myers, Regional Forester

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

February 21, 2010

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

Re: George Washington Plan Revision

Dear Forest Supervisor Hyzer:

The Citizens Task Force is attempting to work collaboratively with you and your staff in the revision of the GWNF Land and Resource Management Plan. To assist us in our efforts, we need to have a better understanding of the rules and procedures that are being used in the revision of the forest plan.

We have used the links on the GWNF/JNF web site taking us to the NFMA page maintained by the Washington Office. We were attempting to locate the provisions of the Forest Service Handbook sections that are relevant to the revision of forest plans. All we could locate were links to sections of the Handbook that implement the 2008 planning rule. However, it is our understanding that the GWNF is being revised under the 1982 regulations (as provided in an amendment to the 2000 planning regulations), not the 2008 regulations, which courts ruled were illegal.

To work collaboratively with you and your staff, we need to have available for our reference and use the provisions of the Forest Service Handbook that you are using to revise the GWNF plan. Please provide us with a link to the Forest Service Handbook sections pertaining to revision under the 1982 regulations. If no link is available, please provide us with a hard copy.

Thank you for your attention to this matter.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa  
Jerome Thomas

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

February 22, 2010

Liz Agpaoa  
Regional Forester, Region 8  
1720 Peachtree Road NW,  
Atlanta, GA 30309-2449

Re: George Washington Plan Revision

Dear Regional Forester Agpaoa:

The Citizens Task Force is attempting to work collaboratively you and the GWNF Supervisor and staff in the revision of the GWNF Land and Resource Management Plan. To assist us in our efforts, we need to have a better understanding of the rules and procedures that are being used in the revision of the forest plan.

From our understanding of the FSH provisions dealing with NEPA, the responsible official for an EIS should prepare a Project Initiation Letter (PIL) that outlines the following:

1. The purpose and need initiating the analysis and proposing the project.
2. The proposed action and some possible connected actions, including mitigation associated with the proposed action.
3. The decision framework, including any sideboards and expectations of the team.
4. Known or anticipated issues.
5. Resource areas that should be included in the analysis.
6. Scoping direction, including the responsible official's role and expectations.
7. Potential alternatives for consideration, if known.
8. An initial cross-check for forest plan consistency, i.e. project is consistent or not with the forest plan.
9. Need for possible forest plan amendment(s).

10. Role assignments and responsibilities: team leader, members, consultants, including how any disputes within the team will be resolved.

11. The time frame and checkpoints for analysis.

If you have signed a Project Initiation Letter, please send us a copy. An electronic copy is acceptable. If you have not signed such a letter, when do you anticipate signing? When it has been signed we would be grateful if you sent us a copy.

Thank you for your assistance.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Jerome Thomas  
Maureen Hyzer

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

March 12, 2010

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

Re: COMMENTS ON GWNF ALTERNATIVES

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 8, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention now some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents---the exact number is irrelevant. Documents such as the draft alternatives should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished

While it is premature to present alternatives at this stage, we want to make certain that alternatives are formulated correctly at later stages in the planning process. The requirements for formulating alternatives are clear in the text of the 1982 regulations

*(f) Formulation of alternatives. The interdisciplinary team shall formulate a broad range of reasonable alternatives according to NEPA procedures. The primary goal in formulating alternatives, besides complying with NEPA procedures, is to provide an adequate basis for identifying the alternative that comes nearest to maximizing net public*

*benefits, consistent with the resource integration and management requirements of Secs. 219.13 through 219.27.*

*(1) Alternatives shall be distributed between the minimum resource potential and the maximum resource potential to reflect to the extent practicable the full range of major commodity and environmental resource uses and values that could be produced from the forest. Alternatives shall reflect a range of resource outputs and expenditure levels.*

*(2) Alternatives shall be formulated to facilitate analysis of opportunity costs and of resource use and environmental trade-offs among alternatives and between benchmarks and alternatives.*

*(3) Alternatives shall be formulated to facilitate evaluation of the effects on present net value, benefits, and costs of achieving various outputs and values that are not assigned monetary values, but that are provided at specified levels.*

*(4) Alternatives shall provide different ways to address and respond to the major public issues, management concerns, and resource opportunities identified during the planning process.*

*(5) Reasonable alternatives which may require a change in existing law or policy to implement shall be formulated if necessary to address a major public issue, management concern, or resource opportunity identified during the planning process (40 CFR 1501.7, 1502.14(c)).*

*(6) At least one alternative shall be developed which responds to and incorporates the RPA Program tentative resource objectives for each forest displayed in the regional guide.*

*(7) At least one alternative shall reflect the current level of goods and services provided by the unit and the most likely amount of goods and services expected to be provided in the future if current management direction continues. Pursuant to NEPA procedures, this alternative shall be deemed the "no action" alternative.*

*(8) Each alternative shall represent to the extent practicable the most cost efficient combination of management prescriptions examined that can meet the objectives established in the alternative.*

*(9) Each alternative shall state at least--*

*(i) The condition and uses that will result from long-term application of the alternative;*

*(ii) The goods and services to be produced, the timing and flow of these resource outputs together with associated costs and benefits;*

*(iii) Resource management standards and guidelines; and*

*(iv) The purposes of the management direction proposed.*

Based on the 1982 regulations, special attention should be paid to the following aspects:

1. The 1982 planning regulations require at least one "No Action" alternative. We believe there are two different alternatives needed to fulfill the requirements of this provision--an alternative that models the current plan direction and another that models the current management. We support developing a "no action" alternative that models current management averaging the level of goods and services outputs over the last five years.
2. The 1982 planning regulations require an RPA alternative. Unless the 1982 regulations are changed, this is a legal requirement which must be met.
3. The 1982 planning regulations require a broad range of alternatives to respond to issues, concerns and resource opportunities (ICOs). We do not know how many alternatives this will require until the ICOs have been determined. We note, however, that the first GWNF Plan was struck down by the Chief because of an inadequate range of alternatives. We urge you not to repeat this error.

When your staff develops alternatives to respond to the issues identified through scoping, the Forest Service should make certain they follow the step-by-step instructions in the NFMA Handbook on implementing the 1982 planning regulations. Although we have asked for either an electronic link or a copy of the handbook so we can work cooperatively with the staff to make certain the EIS and Plan conform to the FSH step-by-step instructions, our request has gone unfulfilled. However, your planner and deputy told us in phone conversations that a hard copy of the Handbook implementing the 1982 regulations exists in the files. We urge that the staff make copies of this document and distribute it to every member of the interdisciplinary team and make an electronic copy available on the GWNF web site for members of the public. Failure to conduct revision of the plan without careful attention to the direction in the Forest Service Handbook will inevitably lead to arbitrary and capricious planning.

Based on the information above, we believe the appropriate remedy to the deficiencies in the planning process is to withdraw the March 10 NOI and reissue an NOI that focuses on scoping for public issues.

Even though we prefer some other mode of revising the GWNF plan (we are participating in the formulation of a new planning rule), we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three

years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more years redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester, R-8  
Jerome Thomas, Deputy Regional Forester, R-8  
Chris Liggett, Director, Planning R-8  
Tony Tooke, Director, EMC, WO  
Richard Cook, Deputy Director, EMC, WO  
Henry Hickerson, Deputy Forest Supervisor GWNF

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

March 11, 2010

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

Re: COMMENTS ON GWNF DRAFT ISSUES

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following **preliminary** comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 10, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention now some serious deficiency with the process you are following in revising the GWNF plan. As we note below, the appropriate remedy at this time is to withdraw the March 10 NOI and reissued it to focus only on scoping for public issues and give the dates for public meetings.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents---the exact number is irrelevant. Documents such as the draft plan components/proposed actions, alternatives, need for change/analysis of management situation, climate change discussion, and potential wilderness/roadless area evaluations should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished

In the NOI it is appropriate to "put on the table" for public review a list of preliminary issues that have been identified through a variety of previous contacts with the public, as well as the request for the public to identify additional issues that should be considered during the formulation of alternatives. We were surprised at the paucity of issues which

the GWNF leadership and staff has presented in the NOI. There was a list of "items", "concerns", or "questions" that we consider issues, but the NOI presented only three "need for change topics" to which they responded with proposed actions. We believe many additional issues should be included in the environmental analysis conducted in the EIS so a broad range of alternatives can be formulated.

There are several sources that the GWNF staff should have used to derive its preliminary list of issues, and by reference we request that you incorporate relevant issues contained in the documents listed below:

1. In the draft AMS there is a review of the issues and sub-issues that were addressed in the 1993 GWNF Forest Plan. We believe the issues or sub-issues that were identified as needing change in the draft AMS should be carried over in the current revision as issues during the preparation of the EIS and preferred alternative.
2. The NOI that initiated planning for five Southern Appalachian National Forests, including the Jefferson National Forest, identified 12 issues derived from the Southern Appalachian Assessment. (SAA)
3. In the 2004 revision of the Jefferson National Forest plan, there were specific issues identified that applied to the JNF that were in addition to those common to the other Southern Appalachian Forests. Other than the issue specific to the management of the Mt. Rogers National Recreation Area, the other issues apply to the GWNF.
4. The management direction in the current Forest Service Strategic Plan should be incorporated as issues or management concerns to be addressed in alternatives and in the plan.
5. The Chief of the Forest Service has reiterated his support for the management concerns that the Secretary of Agriculture outlined as crucial for the Forest Service to address. These can be found in statements and videos on the home page of the Washington Office of the Forest Service. These should be included in the list of issues and management concerns to be addressed in the plan revision.
6. The Regional Forester for the Southern Region (R-8) has identified a strategic framework (available on the Regional web site) that should be incorporated in the list of issues and management concerns addressed in the plan revision.
7. During public meetings held by you and your staff under the 2005 and 2008 planning rule, there were many comments from the public. The web site for the GWNF has documented the results of these meetings, and your staff should be encouraged to analyze the content of these meetings to see which of the statements qualify as preliminary issues.
8. The CTF has identified several additional issues in past statements that should be addressed in the formulation of alternatives:
  - Budget realism

- Consistency with the JNF and other Southern Appalachian Forests

There is substantial overlap among the issues and management concerns in these documents and sources. The GWNF interdisciplinary staff should eliminate duplication.

We have additional issues that we will formulate in detail when we comment in greater detail later in the comment period.

We believe that the staff members did not pay sufficient attention to the Forest Service NEPA Handbook when they developed the March 10 NOI. We suggest more attention to following the instructions in FSH 1909.15 zero code, chapter 10 (Environmental Analysis), and chapter 20 (Environmental Impact Statements and Related Documents) for preparing a Notice of Intent and conducting scoping. Conducting revision of the plan without careful attention to the direction in the Forest Service NEPA Handbook will inevitably lead to arbitrary and capricious planning.

We also believe that the staff members should have used the Forest Service NFMA Handbook when they developed the March 10 NOI. Although we have written to you for a copy of the NFMA planning handbook so we can work cooperatively with your staff to make certain the EIS and Plan conform to the FSH step-by-step instructions, our request has gone unfulfilled. We have been told by your planner and your deputy that a hard copy of the Handbook implementing the 1982 regulations exists in the files. We urge that the staff make copies of this document and distribute it to every member of the interdisciplinary team and make an electronic copy available on the GWNF web site for members of the public. If planners around the country interpret NFMA and the 1982 regulations without careful adherence to the procedures outlined in the FSH, the resulting plans will inevitably suffer from arbitrary and capricious actions.

The public should be asked to focus on scoping at this point, not reviewing draft documents that should be included in the draft plan or EIS. The Forest Service should withdraw the March 10 NOI and reissue an amended NOI which eliminates the extraneous documents for review, presents a more robust preliminary list of public issues and management concerns based on sources listed above, asks for review of this preliminary list, and asks for additional issues that should be addressed in the development of alternatives.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised carefully adhering to the 1982 regulations, as the Chief has directed. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a

halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will only have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester, R-8  
Jerome Thomas, Deputy Regional Forester, R-8  
Chris Liggett, Director, Planning R-8  
Tony Tooke, Director, EMC, WO  
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March 14, 2010

Maureen Hyzer, Supervisor  
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5162 Valleypointe Parkway  
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Re: COMMENTS ON GWNF DRAFT AMS

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 10, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention at an early date some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents--the exact number is irrelevant. One of those documents we are to review is called a Draft Need for Change\_AMS. Documents such as an AMS should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished

The Draft Need for Change\_AMS. document referenced in the NOI follows the form and content of a Comprehensive Evaluation Report (CER) which was required under the 2005 and 2008 planning rules. The Forest issued a draft CER in March, 2007, and invited comments by the public on that document. The Citizens Task Force wrote detailed comments on that draft CER. The GWNF staff updated this draft CER during 2008 and 2009. What appears now as a Draft Need for Change\_AMS document is nearly identical to the draft CER which was created under the 2005 and 2008 planning rules.

However, the 2005 and 2008 planning rules have been held by courts to be illegal. The Forest Service has initiated the writing of a new planning rule, but has allowed some Forests to proceed with plan revision under the previous 1982 planning rule. The George Washington National Forest is one of those Forests proceeding with plan revision under the 1982 rule.

The draft "Draft Need for Change\_AMS" document is totally inadequate to meet the requirements for an AMS in the 1982 planning regulations. Under the provisions of the 1982 planning rule, the Forest Supervisor should prepare an AMS. The regulations specify the minimum content of that document. The relevant section in the 1982 regulations appears as follows:

*(e) Analysis of the management situation. The analysis of the management situation is a determination of the ability of the planning area covered by the forest plan to supply goods and services in response to society's demands. The primary purpose of this analysis is to provide a basis for formulating a broad range of reasonable alternatives. The analysis may examine the capability of the unit to supply outputs both with and without legal and other requirements. As a minimum, the analysis of the management situation shall include the following:*

*(1) Benchmark analyses to define the range within which alternatives can be constructed. Budgets shall not be a constraint. The following benchmark analyses shall be consistent with the minimum applicable management requirements of Sec. 219.27 and shall define at least--*

*(i) The minimum level of management which would be needed to maintain and protect the unit as part of the National Forest System together with associated costs and benefits;*

*(ii) The maximum physical and biological production potentials of significant individual goods and services together with associated costs and benefits;*

*(iii) Monetary benchmarks which estimate the maximum present net value of those resources having an established market value or an assigned value;*

*(A) For forest planning areas with major resource outputs that have an established market price, monetary benchmarks shall include an estimate of the mix of resource uses, combined with a schedule of outputs and costs, which will maximize the present net value of those major outputs that have an established market price;*

*(B) For all forest planning areas, monetary benchmarks shall include an estimate of the mix of resource uses, combined with a schedule of outputs and costs, which will maximize the present net value of those major outputs that have an established market price or are assigned a monetary value;*

*(C) For forest planning areas with a significant timber resource, estimates for paragraphs (e)(1)(iii) (A) and (B) of this section shall be developed both with and without meeting the requirements for compliance with a base sale schedule of timber harvest, as described in Sec. 219.16(a)(1), and with and without scheduling the harvest of even-aged stands generally at or beyond culmination of mean annual increment of growth, as described in Sec. 219.16(a)(2)(iii).*

*(D) Estimates for paragraphs (e)(1)(iii) (A) and (B) of this section shall be developed both with and without other constraints when needed to address major public issues, management concerns, or resource opportunities identified during the planning process.*

*(2) The current level of goods and services provided by the unit and the most likely amount of goods and services expected to be provided in the future if current management direction continues; this will be the same analysis as that required by Sec. 219.12(f)(5).*

*(3) Projections of demand using best available techniques, with both price and nonprice information. To the extent practical, demand will be assessed as price-quantity relationships.*

*(4) A determination of the potential to resolve public issues and management concerns.*

*(5) Based on consideration of data and findings developed in paragraphs (e)(1)-(4), a determination of the need to establish or change management direction.*

The draft document which the Forest has issued for comment appears to make determinations of the need to establish or change management direct without any of the analyses required under the 1982 regulations. We urge you to prepare an AMS with the required analyses and resubmit them to the public for comment in the draft EIS.

The GWNF staff should have available to it guidance in developing an AMS through the Forest Service Handbook. Although we have asked for either an electronic link or a copy of the handbook so we can work cooperatively with the staff to make certain the EIS and Plan conform to the FSH step-by-step instructions, our request has gone unfulfilled. We have been told that a hard copy of the Handbook implementing the 1982 regulations exists in the files. We urge that the staff make copies of this document and distribute it to every member of the interdisciplinary team and make an electronic copy available on the GWNF web site for members of the public. Failure to conduct revision of the plan without careful attention to the direction in the Forest Service Handbook will inevitably lead to arbitrary and capricious planning.

Based on the information above, we believe the appropriate remedy to the deficiencies in the planning process is to withdraw the March 10 NOI and reissue an NOI that focuses on scoping.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told to start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the

1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter. Please contact us if you have any questions about our comments.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester  
Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Richard Cook, Deputy Director EMC  
Henry Hickerson, Deputy Supervisor GWNF

Citizens Task Force on National Forest Management  
2428 Guilford Avenue  
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March 15, 2010

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

Re: COMMENTS ON GWNF POTENTIAL WILDERNESS AREA EVALUATIONS

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan, which appeared in the Federal Register on March 10, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention at an early date some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents--the exact number is irrelevant. Documents such as draft analyses of Potential Wilderness Areas and recommendations for Wilderness should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished

The NOI references draft Potential Wilderness Area evaluations for public comment. This is premature. In the scoping process initiated by the NOI, the focus should be on identifying public issues and management concerns that become the foundation for further planning. The analysis of roadless areas and the recommendation for potential wilderness is a task to be done later in the planning process. The results of the roadless area review should be incorporated in an appendix to the draft EIS and made available for

public review. Different alternatives should have different levels of wilderness recommendations. The level of wilderness recommendation in the preferred alternative should be determined together with other aspects of the alternative because it comes closest to maximizing net public benefits. It is not possible to determine which alternative maximizes net public benefits until the various steps of the planning process have been completed. To make recommendations for wilderness designation in the scoping process before analysis has been conducted strongly suggests that the recommendations are arbitrary and capricious rather than the result of careful planning under the planning regulations.

We believe one of the reasons for the deficiencies noted above is inadequate attention to the text of the 1982 planning regulations. The text of the 1982 planning regulations states clearly that roadless area evaluation will be conducted in the analysis of management situation. We also note that in the 1982 planning regulations, the term used to describe areas that meet criteria for consideration for wilderness recommendation is *roadless area*. The term *potential wilderness* is used to describe roadless areas that have been recommended for wilderness. It appears to us that the FSH chapter 70 which describes the step-by-step procedures to use in evaluating roadless areas for their potential recommendation for wilderness was adopted in 2007 and it relates more to the 2005 and 2008 planning rules than to the 1982 planning rule.

Based on the information above, we believe the appropriate remedy to the deficiencies in the planning process is to withdraw the March 10 NOI which asks for public comment on potential wilderness/roadless area evaluations, among other documents which should be reviewed in the draft EIS, and reissue an NOI that focuses on scoping.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused

NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more years redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter. Please contact us if you have any questions about our comments.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester  
Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Richard Cook, Deputy Director, EMC  
Henry Hickerson, Deputy Supervisor, GWNF

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March 16, 2010

Maureen Hyzer, Supervisor  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
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Re: COMMENTS ON GWNF MIS

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 10, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention at an early date some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents---the exact number is irrelevant. One of items the public is asked to review is a list of management indicator species (MIS). Information such as which MIS should be included in the plan should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished. We believe the March 10 NOI should be withdrawn and reissued later with a focus on scoping the issues that should be addressed in the development of alternatives and plan.

However, the CTF has the following general comments about MIS for consideration at the appropriate time:

1. The selection of Management Indicator Species (MIS) is required under the 1982 planning regulations. We believe management indicator species approach is outmoded.

However, since the selection of MIS is required, we favor making the process as simple, inexpensive, and least burdensome possible.

2. Since monitoring of MIS is already required in the JNF plan, we believe selecting the same species for the GWNF (with the substitution of the GWNF endemic species Cow Knob salamander for the JNF endemic species Peaks of Otter salamander) may be the least costly and burdensome approach. Until we see the analysis in the draft EIS and draft Plan, we cannot say conclusively what the MIS list should include.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter. Please contact us if you have any questions about our comments.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester

Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Richard Cook, Deputy Director, EMC  
Henry Hickerson, Deputy Supervisor, GWNF

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March 17, 2010

Maureen Hyzer, Supervisor  
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Re: COMMENTS ON GWNF DRAFT PLAN PROPOSAL

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 8, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention at an early date some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents---the exact number is irrelevant. In the NOI the GWNF planners have presented draft forest-wide conditions, objectives, and standards as separate documents for public review and comment. In the interdisciplinary team meetings these were part of a draft plan developed under the illegal 2008 planning process. It was clearly called a draft plan on the cover page of this document. Separating the document into different components without a cover page that identifies it as a draft plan does not make it any less a draft plan. Documents such as a draft plan (also called proposed actions) should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing extraneous draft documents instead of issues or management concerns, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished

1. What is called a proposed action is in fact a draft plan that was formulated outside the NEPA process or the process set up by the 1982 planning regulations. A draft plan must

be the result of analyses established by the 1982 planning rule. None of that analysis has been done, and the proposal is on its face an arbitrary and capricious proposed action.

2. What is called a proposed action is in fact a draft plan based on a draft prepared under the illegal 2005 and 2008 planning rule. It contains the same structure as the draft plan prepared by the GWNF under the 2005/2008 regulations: "aspirational" desired future conditions, objectives for moving toward the desired future condition, and design criteria. This is not the structure of plans prepared under the 1982 planning regulations.

3. The proposed action/draft plan does not appear to address key issues that should "drive" the analysis in the EIS. It is not clear what issues it addresses.

4. The time that NEPA allocates for public comment on a draft plan and EIS is 90 days. The NOI allocates only 60 days for the public to comment on the draft plan and several other documents referenced. These documents total more than xxx pages.

5. The proposed action/draft plan calls for large increases in timber harvesting and prescribed burning over current levels. This is wishful thinking. The funding levels for timber and prescribed burning that the GWNF has received over the last 5 years are far less than the budget dollars that would be required to implement the proposed action.

6. The proposed action/draft plan calls for maintaining a suitable base that is equal to that defined for the 1993 plan. There was no analysis conducted to see how many acres are in fact required to achieve an ASQ of 22 MMBF. Since the 1993 plan was based on a suitable base of 350,000 acres (or variously 370,000 acres) to produce an ASQ of 33 MMBF, it would require a substantially smaller suitable timber base to produce 22 MMBF.

7. The proposed action/draft plan is not consistent with the JNF Plan.

8. The proposed action/ draft plan does not protect old growth. It does not even place old growth in a separate prescription but imbeds old growth in other prescriptions. It does not remove all old growth from the suitable base. The plan allows for cutting of old growth.

9. The proposed action/draft plan does not fully protect drinking water sources.

10. The proposed action/draft plan does not protect inventoried roadless areas and potential wilderness areas consistent with the Roadless Rule.

We believe that the staff members did not pay sufficient attention to the Forest Service NEPA Handbook when they developed the March 10 NOI. We suggest more attention to following the instructions in FSH 1909.15 zero code, chapter 10 (Environmental Analysis), and chapter 20 (Environmental Impact Statements and Related Documents) for preparing a Notice of Intent and conducting scoping. We note particularly that the Forest Service has misinterpreted the term "proposal" or "proposed action." As defined in the

NOI, the "proposed action" is in fact a draft plan. In the NEPA Handbook, the term "proposal" or "proposed action" is merely a goal statement. The proposed action statement in this sense is simply to "Revise the GWNF Land and Resource Management Plan." By proposing a draft plan in the scoping notice, the Forest Service is leaping to a conclusion about the preferred alternative before scoping has even taken place. Before a plan can be identified, there are many planning steps that must be taken under the 1982 planning regulations and Handbook direction and NEPA regulations and Handbook direction. Conducting revision of the plan without careful attention to the direction in the Forest Service NEPA and NFMA Handbooks will inevitably lead to arbitrary and capricious planning.

We also believe that the staff members did not pay sufficient attention to the Forest Service NFMA Handbook when they developed the March 10 NOI. We have written to you for a copy of the NFMA planning handbook so we can work cooperatively with your staff to make certain the EIS and Plan conform to the FSH step-by-step instructions. We have been sent an electronic copy of this Handbook by your Deputy. We urge that the staff make copies of this document and distribute it to every member of the interdisciplinary team and make an electronic copy available on the GWNF web site for members of the public. Failure to conduct revision of the plan without careful attention to direction in the Forest Service Handbook will inevitably lead to arbitrary and capricious planning.

Based on the information above, we believe the appropriate remedy to the deficiencies in the planning process is to withdraw the NOI and reissue an NOI that focuses on scoping.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the

planning process back on track than to spend several years doing it wrong and then several years more years redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester  
Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Henry Hickerson, Deputy Supervisor GWNF

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

March 19, 2010

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

Re: STATUS OF PLANNING CRITERIA

Dear Forest Supervisor Hyzer:

In our review of March 10 NOI, documents noted therein or documents available on the GWNF web site, we did not see reference or copy of the planning criteria to be used in developing the plan. This is step two of the ten step planning process under the 1982 planning regulations.

1. If you have drafted planning criteria, please furnish us with a copy.
- 2, If you have not begun work on this important early planning document, when do you expect to start on it?
3. If this work is to be done by the interdisciplinary team, please inform us of the dates when they will work on this document. We have suggestions for the planning criteria that we wish to present for consideration at the appropriate time.
4. If this work is to be done outside a interdisciplinary team meeting, who will be doing the work? As noted above, we have suggestions for the planning criteria that we wish to present at the appropriate time.

Thank you for your attention to this matter.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester

Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Richard Cook, Deputy Director, EMC  
Henry Hickerson, Deputy Supervisor, GWNF

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

March 23, 2010

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

Re: COMMENTS ON GWNF NICHE

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 10, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention at an early date some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents---the exact number is irrelevant. One of documents the public is asked to review describes the GWNF's Niche. Information such as the forest's niche should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. While it is interesting to speculate whether or not Thomas Fairfax, George Washington, Stonewall Jackson, and Robert E. Lee all walked through this land" this is not information appropriate for review in a NOI. The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished. We believe the March 10 NOI should be withdrawn and reissued later with a focus on scoping the issues that should be addressed in the development of alternatives and plan.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to

undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter. Please contact us if you have any questions about our comments.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester  
Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Richard Cook, Deputy Director, EMC  
Henry Hickerson, Deputy Supervisor, GWNF

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

March 24, 2010

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

Re: COMMENTS ON GWNF SUITABLE USES

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 10, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention at an early date some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents---the exact number is irrelevant. One of documents the public is asked to review describes the uses that are suitable for various portions of the GWNF. This document was a focus under the 2008 planning regulations, which courts ruled was illegal. Under the 1982 regulations, information such as the suitable uses should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted in the planning process. The uses that are suitable for various parts of the GWNF will vary according to the alternative that is formulated. Until the alternatives have been formulated and analyzed to see which of them should be preferred and developed into a plan, it is premature to speculate what uses will be appropriate to various parts of the forest. To put forward a document now showing suitable uses before the earlier steps in the 1982 planning process have been completed will bias the later decision.

The purpose of a NOI under the 1982 planning regulations is to begin the scoping process for the public and to notify the public about scoping meetings, not comment on aspects of the final plan. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished. We believe the March 10 NOI should be

withdrawn and reissued later with a focus on scoping the issues that should be addressed in the development of alternatives and plan.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter. Please contact us if you have any questions about our comments.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester  
Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Richard Cook, Deputy Director, EMC  
Henry Hickerson, Deputy Supervisor, GWNF

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

March 25, 2010

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

Re: COMMENTS ON GWNF ROS MAP

Dear Forest Supervisor Hyzer:

The Citizens Task Force on National Forest Management has the following preliminary comments responding to the Notice of Intent to revise the George Washington National Forest Land and Resource Management Plan which appeared in the Federal Register on March 10, 2010. We will provide more detailed comments later, but we believe it is important to bring to your attention at an early date some serious deficiency with the process you are following in revising the GWNF plan.

The NOI says we should comment on documents that are contained on the GWNF web site. A cursory count shows 37 **new** documents for the public to review, plus scores of old documents---the exact number is irrelevant. One of documents the public is asked to review is a Recreation Opportunity Spectrum map of the GWNF. Information such as the ROS mapping should be reviewed by the public in the draft EIS/plan stage, after analysis has been conducted under the planning process set up under the 1982 regulations. The ROS allocations across the GWNF will vary according to the alternative that is formulated. Until the alternatives have been formulated and analyzed to see which of them should be preferred and developed into a plan, it is premature to speculate what ROS class will be appropriate to assign to various parts of the forest. To put forward a document now showing ROS allocations before the earlier steps in the 1982 planning process have been completed will bias the decision.

The purpose of a NOI is to begin the scoping process for the public and to notify the public about scoping meetings, not comment on aspects of the final plan. By presenting a large volume of documents for the public to review, the public attention is diverted from the scoping tasks. To the extent that members of the public spend time on reviewing draft documents instead of issues, the quality of the development of issues will be diminished and the subsequent planning steps, which are based on issues, will also be diminished. We believe the March 10 NOI should be withdrawn and reissued later with a

focus on scoping the issues that should be addressed in the development of alternatives and plan.

Even though we prefer some other mode of revising the GWNF plan and are participating in the formulation of a new planning rule, we want to make certain that the GW plan is revised according to the 1982 regulations as has been ordered by the Chief. We want to assure that the resulting plan can withstand the legal scrutiny that all plans seem to undergo after completion. We do not want to repeat the experience of the first GWNF plan that was challenged by a coalition of national groups and eventually withdrawn by the Chief because it did not follow NEPA and NFMA procedures. The GWNF staff was told the start over, thus wasting nearly seven years of time and money by both the Forest Service and the public. The GWNF staff and public have already spent more than three years working under the 2005 and 2008 planning regulations before the courts ordered a halt to the use of these planning regulations. We have been told to start over under the 1982 planning rule. It would be a terrible waste to spend several **more** years producing a plan that will have to be redone if the 1982 planning process is not implemented with attention to established procedures.

We have brought our concerns to the attention of the GWNF staff, the Regional Office and the Washington Office by phone calls, emails, written statements and presentations at IDT meetings. We had hoped that bringing our concerns about departure from the 1982 process would have resulted in corrective action by now. While withdrawing the March 10 NOI, preparing a more robust list of preliminary issues, and reissuing a more focused NOI will result in a short delay, we believe it is better to take a few weeks now to get the planning process back on track than to spend several years doing it wrong and then several years more redoing it under new planning regulations (which may or may not be free of legal challenges in the foreseeable future.)

Thank you for your attention to this matter. Please contact us if you have any questions about our comments.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester  
Jerome Thomas, Deputy Regional Forester  
Tony Tooke, Director, EMC  
Richard Cook, Deputy Director, EMC  
Henry Hickerson, Deputy Supervisor, GWNF

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

April 8, 2010

Henry Hickerson, Acting Forest Supervisor  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Re: COMMENTS ON MARCH 25, 2010 LETTER

Dear Acting Forest Supervisor Hickerson:

The Citizens Task Force on National Forest Management has the following comments in response to your letter of March 25, 2010, in which you attempted to clarify the focus for public comment on the March 3, 2010 Notice of Intent. In your letter you stated:

*Our intent in providing the documents, tables and maps on the website is to share the background information that we have with people interested in our plan revision. Our intent is not to have a detailed review of every map and analysis document. Instead, we want people to be able to review any documents that may affect their interests as they develop their comments. Specific comments on documents are acceptable, but we are really after their topics of interest and ideas on ways to address their topics.*

In materials you posted on the GWNF website on March 25, 2010, the public was told:

*In the Notice of Intent (NOI) we announced that we are going to prepare an Environmental Impact Statement (EIS) in accordance with the 1982 planning regulations and we asked for your comments by May 7, 2010 on 'the scope of the analysis as presented in the NOI and on our website.' Then we put a large number of new documents and maps on our website. We would like to assure you that we are not seeking comment on everything; nor is this comment period the only time we will accept your comments. The primary objective for this particular comment period is to identify the significant issues and alternatives for management direction that addresses those significant issues.*

This appears to conflict with the language of the NOI, which clearly states:

*It is important that reviewers provide their comments on what is presented in this notice and on the Web site at such times and in such a way that they are useful to the Agency's*

*preparation of the revised plan and the EIS. Comments on the need for change, proposed actions, issues and preliminary alternatives will be most valuable if received by May 7, 2010 and should clearly articulate the reviewers' concerns. The submission of timely and specific comments can affect a reviewer's ability to participate in any subsequent administrative or judicial review.*

If you want to refocus the attention of the public and narrow the scope of what we are to comment on, please withdraw the NOI. The language of the NOI is binding, not the "clarifying" language in a letter or website posting. In a new NOI you should presents a preliminary list of public issues and ask for public comments on that list. The planning process set forth in the 1982 regulations has 10 steps. You need to start with step one.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester, R-8  
Jerome Thomas, Deputy Regional Forester, R-8  
Chris Liggett, Director, Planning R-8  
Tony Tooke, Director, EMC, WO  
Richard Cook, Deputy Director, EMC, WO  
Maureen Hyzer, Forest Supervisor GWNF

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

April 22, 2010

Henry Hickerson, Acting Forest Supervisor  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Re: COMMENTS ON APRIL 19 MEETING

Dear Acting Forest Supervisor Hickerson:

The Citizens Task Force on National Forest Management has the following comments on the public meeting held in Lexington on April 19.

In his long opening presentation, Ken Landgraf, the Planning Staff Officer, showed a slide showing a list of preliminary issues that the GWNF staff has compiled. This list was also posted on the wall of the break-out session I attended. I stated to the leader of the break-out session that this list should have been made available to the public before the meeting so the public would have had a chance to study it rather than "shoot from the hip" in commenting on the adequacy of this list. I repeated this comment to Ken Landgraf after the break-out session, and I requested that the list be posted on the GWNF web-site for the benefit of the public in preparing for the remaining public meetings and for preparing written comments responding to the March 6 NOI. I also requested that the comments from the public meetings should be posted so members of the public can see what additional issues and sub-issues have been identified at the break-out sessions.

We note that the list of preliminary issues and a summary of the comments from the April 12 meeting have now been posted on the Forest's web-site. We hope that the results of the other public meetings will also be posted quickly so they will be available for the public in time to prepare comments. There was no "general session" at the April 19 meeting in Lexington, so we have no idea what was discussed in the three other break-out sessions, let alone what was discussed at other meetings. For members of the public interested in making certain that all significant issues are identified so they may be addressed in development of alternatives, it is important to see if there are still significant issues have not been identified or listed by the Forest staff.

The list of potential issues presented at the April 19 meeting and now posted on the Forest web-site includes 20 categories. Below the document title is a note that says,

**"There are numerous sub-issues within each category."** It is just as important to reveal to the public the preliminary list of sub-issues as it is the more general issue categories. It is not sufficient to say that "Climate Change" or "Old Growth" or "Drinking Water" may be issue categories. It is necessary to outline the sub-issues for each of these general categories to see if meaningful responses can be developed in alternatives. Please post a revised document showing the numerous sub-issues within each category.

This is a task that should have been addressed by the Interdisciplinary Team in their meetings in January and February. Instead, they chose to spend most of their time on fine-tuning the draft plan that had been developed under the 2008 planning rule and in compiling 36 other documents. These documents were posted on the web-site and noted in the March 6 NOI as important background information for preparing scoping comments. The task that should be before the public at this time is to identify the issues that should be included in the revision. The only background material that is relevant to that task is a preliminary list of public issues that may have been gathered during the 2005/2008 planning process.

Please make the development of the issue/sub-issue document an immediate priority so this document can be presented to the public with sufficient time to develop comments responding to the scoping notice. Since the deadline for comments is only two weeks, we do not see how it is possible for your staff to develop the this necessary information and allow the public sufficient time to incorporate it in their comments. We urge you to extend the comment period by 30 days to allow sufficient time for completing these tasks.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc: Liz Agpaoa, Regional Forester, R-8  
Jerome Thomas, Deputy Regional Forester, R-8  
Chris Liggett, Director, Planning R-8  
Tony Tooke, Director, EMC, WO  
Richard Cook, Deputy Director, EMC, WO  
Maureen Hyzer, Forest Supervisor GWNF

## Members of the GW Interdisciplinary Team

At the January 7, 2010 interdisciplinary team meeting, I stated that it was important to be constrained by budget realities in designing the Land and Resource Management Plan for the George Washington National Forest. During the past development of the GWNF and the JNF plans, there has been little attention to the likely resources available in the annual budgets for actual management of the forests. The consequence has been to allow inflation of the desired condition and objectives for managing the forest because the hopes and aspirations of the Forest Service and public are generally more costly than the resources available to bring about the desired conditions on the ground and to meet the objectives for outputs. This only leads to frustration on the part of both Forest Service managers and attentive members of the public about the gap between what is hoped for and what is actually accomplished. It also leads to conditions on the ground that do not achieve the desired conditions outlined in the plan.

I have heard countless times the argument that we should develop a plan based on what the Forest Service and the public think should be the desired condition of the forest, without regard to the likelihood of budgets available to accomplish the goals and objectives of the plan. The argument is made that if the public really wants to see the plan accomplished, sufficient political pressure can be generated through the political process to fund the desired management. It never happens that way because it misconstrues how the budgets are developed in congress and allocated by the Forest Service hierarchy. This argument only perpetuates the gap between what is desired and what is possible.

At the IDT meeting, Ken Landgraf agreed that more attention needs to be paid to constraints that flat or declining budgets impose on the development of plans, but he expressed uncertainty how this should be incorporated in the planning process. He and I agreed that incorporating budget constraints in the planning criteria was one possibility. After thinking more about this, I think additional steps need to be taken to assure that "budget realism" is a real consideration. In the development of the 2004 Jefferson (and other Southern Appalachian Forest Plans), there was a criterion that the adopted plan should be budget realistic, but this did not have any influence on the development of the preferred alternative. I believe the primary reason for this is that budget costs were evaluated near the end of the planning process rather than early in the process when alternatives were formulated. It was extremely difficult to "go back to the drawing board" after much effort had been expended on developing the rolling alternative. My conclusion from the JNF (and other SA Forest Plans) experience is that budget constraints must be incorporated at the early stages of developing the preferred and other alternatives if they are to have any effect on shaping the final plan.

I believe a better way to incorporate budget realism in the planning process is to develop an alternative that is based on current management. I know that the accepted "no action" alternative is to model the current plan, and I think you need to develop an alternative that shows the current plan just to meet legal requirements under NEPA and the 1982 planning regulations. However, developing an alternative based on current and projected

budget trends would be a better starting point for discussions for a "rolling alternative". It would be much easier to develop a plan that is actually achievable if we started from what really exists on the ground and what resources are actually available, and then discuss what tradeoffs can be made to incorporate to the extent possible the public issues, management concerns and resource use opportunities formulated during planning.

In know it is tempting to continue on with the alternative developed over the last several years under the 2005 and 2008 planning regulations. However, that process was illegal, and I am very concerned about carrying forward results from that illegal process without careful review to make certain the 1982 process is not violated. At last Thursday's IDT meeting I heard some support for using the alternative developed through the discredited process as the "proposed action" when issuing a Notice of Intent to initiate the planning process under the 1982. I do not think that is wise to identify an alternative as a proposed action at this point. As I argued above, I think we need to make certain that budget realism is incorporated into the process of developing a preferred alternative. Under the 2005/2008 planning regulations there was little requirement to do the kind of economic analysis that is either required or at least more feasible under the 1982 regulations.

Jim Loesel

1. **(May 21)** I'm trying to understand the dimensions of the timber program in each of the alternatives, especially as shown on table 2-17 on page 2-36 of the draft EIS. Can you help me by clarifying the following:

1. Karen said the ASQ for alternative A, which we had assumed for years was 330 MMBF for the decade, was adjusted to 235 MMBF due to a change in the official conversion ratio between cubic feet and board feet. I noticed at least one place where the ASQ for alternative A was still described as 33 MMBF per year. Is there some way to make certain that all the conversions are done (and made clear to the public what has been done) so there is no confusion about the volume associated with this alternative?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

2. Are ASQ figures for all the alternatives correct? Assuming that the ASQ as expressed in terms of cubic feet (rather than board feet) is correctly expressed in table 2-17 for all the alternatives, am I correct that the preferred alternative (alternative G) has an ASQ that is approximately 15% higher than the current plan (alternative A)?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

3. Are the acres suitable for timbering correct for all the alternatives in this table? Am I correct that the suitable base in the preferred alternative is approximately 25% higher than in the alternative modeling the current plan?

*Karen Responded on 6/6/11. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

Follow-up to 3 on 6/6/11. You did not directly answer my question #3 whether or not the suitable base figures used for alternatives displayed in the table were accurate. The errata sheet shows a suitable base for the preferred alternative of 439,000 acres. The FAQs uses a figure of 450,000. In other places in the documents, a variety of figures appear. Which of these figures is correct? I haven't gone through to check all the alternatives to see what variation may exist in various places in the documents, but I would not be surprised to find substantial variation in the suitable base figures for each alternative. Until there is a systematic examination of the documents and systematic correction to a single number to express the suitable base acreage for each alternative, I don't know how the public is supposed to know what the Forest Service is proposing, or how we can be expected to make substantive comments about the proposed action or the alternatives.

*Response: In the Summary document, page S-21 under Timber Harvest, the suitable acres should be 439,000 acres (not 440,000). In the FAQs document, page 1, the change in suitable acres should be to 439,000 acres (not 450,000). In the Draft Plan, pages 3-30 and page C-2, Total Suitable Land should be 439,000 acres (not 438,000) and Economically Inefficient Land should be 114,000 acres (not 115,000.) Changes will be identified to the public in Errata 3.*

4. The table shows that in alternative A the number of acres harvested to produce the ASQ of 47 MMCF is 30,000 acres over the first decade. The table also shows that for alternative G, the number

of acres harvested to produce the ASQ of 54.3 MMCF is 18,000 acres. Since the ASQ for alternative G is approximately 15% higher than alternative A, I would expect that the number of acres needed to produce this higher volume would rise approximately 15% rather than fall by 40%. This table shows that alternative E also has 18,000 acres harvested, but it is associated with an ASQ of 31.1 MMCF. This is more what I would expect as the relationship between ASQ and acres harvested. Could you clarify? Is there an error in the figures? If not, are they based on Spectrum runs?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

2. **(May 28)** I called Ginny Williams last week with questions about the allocation of SIOs in the draft GWNF plan, and I have some additional questions about the management of scenery.

As I noted in my discussion with Ginny, the 1993 GWNF Plan (p.2-24, Table 2-5) allocates adopted VQOs as follows:

Preservation	46,000
Retention	379,000
Partial Retention	548,000
Modification	88,000

The current draft for the revised GWNF EIS for the Forest Plan includes a crosswalk between Visual Quality Objectives and Scenic Integrity Objectives in Table C5.1 on page 3-251 of the draft EIS.

I would expect that Alternative A, which models the current GW Plan as the No Action Alternative, would show the following SIOs:

Very High	46,000
High	379,000
Moderate	548,000
Low	88,000

However, in the current draft Plan for the GWNF, the allocation of SIOs for Alternative A, the 1993 GWNF Plan, is far different. See table C5.3 on page 252 of the draft EIS the acres (rounded) are as follows:

Very High	46,000
High	350,000
Moderate	203,000
Low	467,000

What accounts for the differences in portraying the allocation of VQOs/SIOs in the 1993 GWNF Plan?

I noticed that in table C5.3, the alternatives have varying acreage in the four SIO classes. On what basis are SIOs allocated in these alternatives to account for the varying figures?

*Response: The SIOs are determined from a combination of the Scenic Class and the Management Area Prescription as indicated in the standards for each Mgmt Area Rx. Therefore, the SIOs do vary between the alternatives, according to the alternative's Mgmt Area Rx allocations. Alternative A represents the current Forest Plan, but it was described in terms of the 2011 Management Prescription Areas rather than the 1993 Management Areas to facilitate comparison of alternatives.*

*In regard to Scenic Integrity Objectives, the Management Prescription Areas differ from the 1993 Management Areas. In the DEIS we incorrectly used the 2011 Management Prescription Areas to describe the Scenic Integrity Objectives for Alternative A. We have identified these errors in Errata #3.*

**3. (May 28)** In the 1993 Plan the allocation of ROS by acreage was:

SPNM	150,000
SPM	206,000
Roaded Natural	615,000
Roaded Modified	86,000

I could not find a table that compared the distribution of ROS classes among the various alternatives in the draft EIS. If there is a table that I missed, on what page is it located?

If this information is not included in the draft EIS, what is the distribution of ROS acreage that you used in your analyses?

In the 1993 Plan/EIS, there was a map of the ROS areas. Is there a similar map available for the draft alternatives?

The draft Plan gives a range of acreage in ROS classes. Why is there a range instead of a fixed number? Is there a visual display showing the areas that would be included/excluded in the upper or lower range of allocation?

*Response: The 1993 Forest Plan assigned, or “adopted” ROS classes for specific areas of the Forest. These were assigned differently in different alternatives. Unlike the 1993 Plan, the proposed Plan does not use adopted ROS classes so there is no variation between the alternatives. The ROS inventory acres are displayed in the first column of Table C1.10. There is an ROS map under the Maps category on the Key Documents section of the revision website. The range of acres by ROS class is displayed to acknowledge that areas currently inventoried as Semi-Primitive Motorized or Semi-Primitive Non-Motorized that are in Management Prescription Areas that allow road construction, could be potentially changed to Roaded Natural settings. This would occur after site specific analysis, so cannot be mapped. However, the only place this would occur is in Management Prescription Areas that allow road construction.*

**4. (May 28)** As you may recall from my presentations in the IDT meetings, I am interested in the budgets needed to implement the plan or alternatives.

I did not see any figures in the draft Plan or EIS about the budgets that would be needed to implement the various management activities. If there was such a discussion that I overlooked, could you give me the page(s) in the draft documents? If you did not include these in the draft EIS or Plan, did you calculate these when you were doing analysis of the various alternatives, and could you send the figures?

I also did not see any display of the budgets associated with management of the GWNF over the life of the current (1993) Plan. Are these figures available? If so, would you please send them?

*Response: Historical budgets since 1993 are included in Appendix E – Budgets and Accomplishment History in the Analysis of the Management Situation. The estimated program budgets for each*

alternative were used in the Present Net Value determinations discussed in Chapter 3 of the DEIS and in the economic input/output IMPLAN model estimates for contributions to jobs and income in the local economy . However, the budget estimates were not included in the DEIS itself but are presented below.

Program Costs (M\$'s, average cost for <u>first</u> decade)	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
<b>Timber</b>	1,880	2,160	0	3,680	1,240	800	2,160
<b>Roads/Engineering</b>	1,353	1,358	1,151	1,468	1,330	1,283	1,358
<b>Recreation</b>	3,845	3,845	3,562	4,128	3,562	4,128	3,845
<b>Wildlife</b>	573	637	382	700	637	637	637
<b>Soil, Water &amp; Air</b>	1,371	1,318	709	1,318	1,344	1,318	1,344
<b>Fire</b>	1,214	1,955	1,214	1,527	2,183	1,955	1,955
<b>Lands</b>	427	427	427	427	427	427	427
<b>Range</b>	10	10	10	10	10	10	10
<b>Minerals</b>	190	190	190	228	190	190	190
<b>Planning, Inv., Monitoring</b>	400	400	400	400	490	400	400

5. (May 28) You mentioned in the draft EIS that changes were made in the conversion ratio between cubic feet and board feet, so the 33 MMBF volume given for the 1993 GWNF Plan was adjusted downward. (Please note that you still list the volume for the 93 Plan as 33 MMBF at least once.)

What is the "old" conversion factor that was used in the 93 Plan and what is the current conversion factor?

Has that changed more than once since 1993?

How have figures used to report volume cut since 1993 (usually given in MMBF) been adjusted over time?

*Karen Responded on 6/6/11; The old conversion factor used in the 1993 GW Plan was 6.98 to go from MMCF to MMBF. At one point, it was 5.5 and now it is 5.0. As you can see in the Errata for the DEIS document, we did find that we were not consistent in using the same conversion factor in reporting volume sold over the years. However, Russ did look over the spreadsheet he has been keeping that reports volume cut since 1993 and there is a footnote on that one (started by Jim Sitton) where Jim was using the same conversion factor of 5.0 throughout the years. So Russ feels confident that the volume cut that he has given you in the past did adjust the volumes to a common conversion.*

6. (May 28) I was reading your write up in the draft Plan and EIS about roads, and I can't make out what you have in mind for road management. I guess I'm an old fashioned guy who needs a table for the number of miles of open, seasonally open, and closed miles of road for each alternative. I didn't see such a table, but maybe you can point one out, or send me the figures.

Response:

7. (May 29) I've looked for the rotation ages for the various forest types, but I didn't see it in the documents.

What rotation ages were used in the Spectrum runs?

Are these rotation ages the same as the CMAI?

*Response: Since the preferred alternative uses mgmt Rx 13 instead of the individual wildlife habitat and timber production Mgmt Rxs as in the 1993 Plan and the JNF Plan, we have forest-wide rotation ages that apply, as shown in standard FW-112, page 4-13 of the Draft Plan. The emphasis became the ecological system, not the Mgmt Rx in terms of the rotation age. The Northern Hardwoods ecological system would fit under the Cove Hardwoods in the rotation age table and the Spruce Fir ecological system would fit under the White Pines. The CMAI ages are found at the following standard FW-113.*

*For the alternatives that kept the individual wildlife habitat and timber production Mgmt Rxs (Alts A and D), the Spectrum rotation ages varied. For example, Mgmt Rx 8C (1993 MA 14) had longer rotations ages. For the alternatives that used Mgmt Rx 13 (Alts B, E, F, G), the rotation ages used for Mgmt Rx 13 in Spectrum were as listed in the FW-112 table 4.2 in the Plan. The following table of rotation ages used for each alternative in Spectrum will be added to Appendix B of the Final EIS.*

**Rotation Ages for Mgmt Rxs Suitable for Timber Production by Alternative**

Rx Code	Rx Description	Alt A	Alt B	Alt D
7A1	Scenic Byway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
7B	Scenic Corridors and Viewsheds	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
7C	ATV Use Area	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90
7E	Dispersed Recreation Areas			
7E2	Dispersed Recreation Areas-Suitable for Timber Production	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
7F	Blue Ridge Parkway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
8A1	Mix of Successional Habitats	CVH, UPH 100-120 WPN, SYP, SO 80-100		CVH, UPH 100-120 WPN, SYP, SO 80-100
8B	Early Successional Habitats	CVH, UPH 80-100 WPN, SYP, SO 80-100		CVH, UPH 80-100 WPN, SYP, SO 80-100
8C	Black Bear/Remote Habitats	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100		CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100

8E4b	Indiana Bat-Secondary Conservation Area	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
10B	Timber Production	CVH 70-90 UPH 80-100 WPN, SYP, SO 60-80		CVH 70-90 UPH 80-100 WPN, SYP, SO 60-80
13	Mosaics of Habitat-Suitable for Timber Production	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	
<b>Rx Code</b>	<b>Rx Description</b>	<b>Alt E</b>	<b>Alt F</b>	<b>Alt G</b>
7A1	Scenic Byway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7B	Scenic Corridors and Viewsheds	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7C	ATV Use Area	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7E	Dispersed Recreation Areas		CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7E2	Dispersed Recreation Areas-Suitable for Timber Production	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100		
7F	Blue Ridge Parkway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
8A1	Mix of Successional Habitats			
8B	Early Successional Habitats			
8C	Black Bear/Remote Habitats			
8E4b	Indiana Bat-Secondary Conservation Area	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
10B	Timber Production			
13	Mosaics of Habitat-Suitable for Timber Production	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100

UPH = Upland Hardwoods

SYP = Southern Yellow Pines

CVH = Cove Hardwoods

WP = White Pines

SO – Scarlet Oak

8. (June 5) Is your link to the EIS of the 1993 GWNF Plan broken? The 93 EIS won't open for me.

Response: [We checked the link and found it to be working.](#)

9. (June 7) I got an email from someone stating that the proposed plan shows a decline in ASQ from the 93 plan. I followed up to see where this notion had come from, and there it is in the Summary, page S-21. "The Plan objective is to slightly reduce the annual Allowable Sale Quantity (ASQ) from 6.6 to 5.4 million cubic feet (MMCF) [27 million board feet (MMBF)]." That seems at odds with other statements about the volume (in cubic feet) for the current plan. What are the correct figures?

~~No # (June 9) In a message dated 6/6/2011 9:57:10 A.M. Eastern Daylight Time, kovercash@fs.fed.us writes:  
Thanks for picking these errors up (note that the errata is version 1, I'm sure there will be more to come...).~~

~~Under the heading "More to Come"....~~

Table 2-17 in the errata sheet needs to be corrected further.

Table 2-17. Comparison of the Timber Harvest Issue by Alternative

	Alternative						
	A	B	C	D	E	F	G
Age Class Distribution in 2040	Percent of Forested Acres						
0-10 (1% in 2010)	3	3	0	5	2	1	2
11-40 (9% in 2010)	7	7	1	10	5	3	5
41-80 (7% in 2010)	10	10	10	8	10	10	10
81-100 (36% in 2010)	1	1	1	1	1	1	1
101-130 (33% in 2010)	34	34	40	34	35	38	35
131-150 (8% in 2010)	25	25	27	24	26	26	26
150+ (6% in 2010)	20	20	21	18	21	21	21

The percent in forested acres for the preferred alternative (G) was based on a harvest rate of 1800 acres per year. You corrected the harvest rate to 3,000 acres per year for the preferred alternative, but you need to change the age class distribution to match alternative B, which has the same harvesting program as alternative G. You also need to go through the documents to correct any other tables/figures that have the incorrect age class distribution figures for the preferred alternative.

Response: [Regarding the statement made on page S-21 of the Summary document, we cannot determine where the 6.6 MMCF came from but it is in error and will be corrected in Errata 3. It should actually read that the Plan objective is to slightly increase the annual ASQ from 4.7 MMCF in the 1993 Plan to 5.4 MMCF.](#)

- 10. (June 9)** Referring to Table 2-2. Land Allocation of Management Prescriptions by Alternative, on pages. 2-18 and 2-19 in the draft EIS:

I don't understand why the acres allocated to some prescriptions vary among the alternatives. Why is the acreage allocated to Wilderness (prescription 1A) not the same for all alternatives? The designated Wilderness hasn't changed, has it? Why is the acreage allocated to Research Natural Area not the same for all alternatives? Why is the acreage allocated to Mt. Pleasant National Scenic Area not the same for all alternatives? Why is the acreage allocated to the Blue Ridge Parkway not the same for all alternatives? Why is the acreage allocated to the Appalachian Trail Corridor not the same for all alternatives? Why is the acreage allocated to the Indiana Bat Secondary Habitat not the same for all alternative? Etc.

*Response: The difference between alternatives in acreage for Management Prescription Area 1A(Wilderness) is less than 60 acres, the difference for Research Natural Areas is 1 acre, the difference for Mt. Pleasant is less than 9 acres. For these areas the differences are inconsequential and due to minor errors in mapping the alternative in the Geographic Information System (GIS). The actual boundaries of these areas do not change by alternative. For the other areas, the acreage will change due to a hierarchy of mapping. For instance, the Appalachian Trail corridor will not be displayed, nor will its acreage be included in the total acreage of Management Prescription Area 4a if it is located within a recommended wilderness area. [The hierarchy of mapping is explained on page 3-1 of the Plan for Table 3.1 but should have also been noted on page 2-18 of the DEIS for Table 2-2 and page 5-11 of the Summary for Table 1.](#) Since the recommended wilderness areas vary by alternative, the acreage of other areas will vary as well. [The acres listed for each Management Prescription Area description in Chapter 4 of the Plan identifies the actual acres, regardless of the mapping hierarchy used in the alternative maps.](#)*

- 11. (June 11)** In Table C6.13 Acres by Method of Harvest for the First 10 Years for all Harvest Methods on page 3-266 of the draft EIS, the number of acres cut over the decade in the preferred alternative (G) totals 34,000, which would equate to 3400 acres per year. Why is this number different from the 3000 acres of harvesting per year that is used in several other places in the draft plan and draft EIS to express the number of acres cut to produce the ASQ? Which number should be the authoritative number? The number of acres cut in the "no action" alternative (A), is 32,670, or 3267 per year, while the number in other places in the draft EIS to express the number of acres cut to produce the ASQ is 3,000 Which number should be the authoritative number for the "no action" alternative?

*Response: Table C6.13 displays the correct level of acres expected to be harvested. In several areas of the Draft EIS and Draft Plan the harvest level should have been labeled as the regeneration harvest level. These references did not include the acres to be thinned. We have identified these errors in Errata #3.*

- 12. (June 12)** Please help make sense out of Table 2-5. Projected Habitat Components at 10 Years by Alternative, on page 2-22 of the draft EIS. How can Alternative A, the no action alternative, have 4% in early successional habitat after 10 years while alternative G, the preferred alternative, has 2-3% in early successional habitat after 10 years, even though alternative G has more timber harvested than alternative A?

*Response: Table 2.5 was based on information from Table B2.11. Tables B2.11 and B2.12 have been updated in Errata #3 to properly reflect that the Early Successional Forest acres listed for Alternatives A and C include the acreage of early successional habitat expected from natural disturbances in addition to timber regeneration harvest, while the other alternatives only include the early*

*successional habitat created by timber regeneration harvest. The Errata also corrects an error in the harvest level for Alternative F. In adjusting for these factors, Table 2.5 has been updated to reflect the early successional habitat created by timber harvest and natural disturbances.*

- 13. (June 15)** I am looking at Table 2. *Summary of Effects of Alternatives*, on page S-14 of the Summary. The table shows that the "open woodland" habitat after 10 years for alternatives B, E, F, and G is 11%. Am I correct that this habitat is the result of prescribed burning? This same table shows that the prescribed burning levels for alternatives B, F, and G are in the range of 12,000 to 20,000 acres per year, and the level for alternative E is 20,000 acres. Since the effects are the same for B, E, F, and G, am I correct in my conclusion that the level of burning that is being described in the 11% figure is 20,000 acres? Is there any effort to show the effects for alternatives B, F, and G if the rate of burning is somewhere between 12,000 acres and 20,000 acres?

*Response: You are correct that this is the result of prescribed burning. Unless otherwise noted in the analysis, the higher number in the range is what was analyzed in the EIS. The effects of the lower end of the range (12,000) is reflected in the figures for Alternative D that had a range of 5,000 to 12,000 acres.*

- 14. (June 17)** While discussing the draft plan with the Washington Office, we discussed the SIOs for the various alternatives. I couldn't answer key questions because I didn't have any maps for alternatives. Are there maps that show SIOs by alternatives? If there are, are they displayed somewhere on the website? If not, could you send them to me electronically or put them up?

*Response: [We do not have maps that show SIO's by alternative. A map of the SIO's associated with the Draft Plan \(Alternative G\) is posted in the Key Documents on the website. If we generate maps of SIO's by alternative we will post copies on the website.](#)*

- 15. (June 19)** I'm having trouble making sense of the transportation (roads) planning in the draft documents. Perhaps you can help explain what you've done.

1. In the draft EIS discussion about roads in chapter 3, pages 3-272 and 3-273, there is no discussion of cost or environmental effects (esp. sediment) included for the various alternatives. Are these effects discussed elsewhere in the EIS?

*Response: Effects to and from roads are discussed in Chapter 3 in the sections on Geology, Climate, Soils, Air, Water, Terrestrial Species, Aquatic Species, Fire, Recreation, Cultural Resources, Wilderness/Roadless, Scenery, Minerals, and Social/Economic Resources. Costs are discussed [in Questions #4](#).*

2. There is reference to Travel Analysis Process (TAP), which appears to be the analysis "driving" the development of the minimum road system needed for each alternative. There is no explanation in the draft EIS for the methodology used to develop the road mileage for the different alternatives. If the alternative road mileage is derived from TAP analysis, why is there no link to TAP analysis or an appendix outlining this analysis?

*Response: The TAP Report and TAP data does appear as a link on the Forest Plan Revision website.*

3. In Table C 8.3, which displays the maintenance level of the roads, the "No Action" alternative (A), has a higher total road maintenance mileage (1852 miles) than the total miles of roads in the current system (1823 miles). How can that be?

*Response: [The higher total mileage of roads is due to the fact that an estimated 29 miles of road would be constructed during the first decade under Alternative 1](#)*

4. In the 1993 GWNF Plan, the total mileage of Forest Highways in Virginia and West Virginia was 797 miles. The draft EIS says that the current mileage of Forest Highways in Virginia and West Virginia is 804 miles. If only 7 miles of road maintenance was transferred from the responsibility of the GW to the two states over the last 18 years, what reason is there to assume that 107 miles will be transferred to maintenance by the States over the life of this plan, especially in light of the budget squeeze on state transportation budgets for the foreseeable future?

*Response: The DEIS states on page 3-272 "It is anticipated that at least a portion of the 107 miles of road will be upgraded and converted to a Forest Highway within the current Plan period." The Forest will work towards this goal. It is not expected that it will be achieved within 10 years.*

5. Table C 8.3 shows that the "No Action" alternative (A) includes 8 miles of roads maintained at level 5, whereas all other alternatives include only 5 miles of roads at level 5; the "No Action" alternative includes 97 miles of roads at level 4, whereas all other alternatives include 33 miles at this maintenance level; the "No Action" alternative includes 465 miles of maintenance level 3 roads, whereas the other alternatives have mileage that range from 297 to 313 miles. Since Table C 8.1 shows that in all alternatives, including the "No Action" alternative, the minimum road system does not include 50 miles of Special Uses or 107 miles of Forest Highways, what accounts for the large disparity between the "No Action" alternative and all other alternatives?

*Response: [Table C 8.3 incorrectly included the Special Use road mileage and the Forest Highway mileage. The table is corrected in Errata #3. The remaining disparity is due to the lack of decommissioning in Alternative A.](#)*

16. (June 19) In reviewing Table C1.14 Estimated Total Acres of Big & Small Game Emphasis Areas by Alternative (in thousands), alternative G shows 507 (thousand) acres in the suitable base. This is far more than the 439,000 (or 440,000 or 450,000) shown elsewhere in the documents. Alternative A, the "No Action" alternative, shows 371.3 (thousand) acres as suitable, which is more than the 360,000 acres in the 93 Plan's suitable base. Are these figures in error, or is there some other explanation?

*Response: This table is in error regarding suitable acres. The amount of are suitable for timber production is not needed in this table. It is corrected in Errata #3.*

17. (June 19) The draft Plan contains the following statements:

***OBJ REC-7: Maintain a total of at least 244 miles of open or seasonally open roads as high clearance roads to meet Off-Highway Vehicle user needs.***

***The mileage of roads maintained for high clearance vehicles (OHV) is estimated to be about 1,030 miles across the Forest, near current levels.***

***OBJ RDS-3: Maintain to standard a minimum of 75 miles of passenger car roads (OML 3-5) and a minimum of 105 miles of high clearance vehicle (OML 1-2) roads on an annual basis.***

Could you please clarify how many miles of roads are maintained suitable for high clearance vehicle use?

*Response: It is estimated that about 1,030 miles of road will be maintained at maintenance level 2 which is designed for high clearance vehicles. There is an objective to assure that at least 244 miles*

of these high clearance roads will be open, at least seasonally to meet the needs of OHV users. The third item refers to annual road maintenance activities as opposed to a total number of roads available for use at a specified maintenance level.

- 18. (June 21)** In analyzing developed recreation capacity, the draft EIS uses the measure of “Person at One Time” (PAOT). In Table C1.11 *Estimated Capacity (PAOTs) of Developed Recreation Areas by Alternative* on page 3-210, it is claimed that the “No Action” alternative (A) has a PAOT of 10,210. However, the 1993 GWNF Plan, which is supposed to be represented in alternative A, actually shows a PAOT of 16,200. See page 2-85 of the 1993 GWNF EIS. Do you agree that a correction needs to be made in the draft documents to reflect the correct figures for alternative A? According to the 1993 EIS, the capacity **existing** in 1993 was 13,820 PAOT. See page 3-7 of the 1993 GWNF EIS. The PAOT capacity of 16,200 in the 1993 Plan was the result of substantial construction of new facilities. In the preferred alternative for the new GWNF plan, the Forest Service is proposing a substantial reduction in developed recreation capacity. The POAT capacity in the preferred alternative (G) is only 10,720. See page 3-210 in the draft EIS. However, there is no explanation or analysis of this substantial reduction from capacity that existed in 1993. Do you agree that the Forest Service is proposing a substantial reduction in developed recreation capacity? Do you agree that the planning documents should include an analysis of where these reductions are taking place and the rationale for the reductions?

*Response: [Table C1.11 is incorrect for Alternative A in that it did not include the planned construction of additional facilities. The table is corrected in Errata #3. The figures for Alternative A are different from those in the current plan to reflect that some facilities have been closed. Rather than proposing a substantial reduction in capacity, Alternative G reflects the current status, but without the planned additional construction in Alternative A. Additional explanation is included in Errata #3 \(in Progress\).](#)*

- 19. (June 21)** Could you help me understand how ROS settings are guiding the planning of dispersed recreation in the draft GWNF plan/EIS? Alternative A, the "No Action" alternative, has a specific number of acres in six ROS classes, as described in Table 2-11, on page 2-40 of the 1993 Plan,

<u>ROS Class (Thousands of Acres)</u>	
Rural	2
Roaded Modified	86
Roaded Natural	613
Semi-primitive Motorized- 1	104
Semi-primitive Motorized-2	104
Semi-Primitive Non-Motorized	150

There is also a map in the planning records for the 1993 GW Plan that shows where these acres are to be allocated on the ground. There are also maps for the 2004 JNF Plan that show where the ROS class acres are allocated on the ground.

However, I did not see any maps that show where the ROS classes are allocated on the ground for alternatives B through G in the current revision documents. Did you prepare such maps? If not, how is the public to evaluate the adequacy of the various alternatives in making ROS allocations expressed in Objectives? (It would be particularly helpful to have ROS maps that also show roads that are candidates for decommissioning so the public could evaluate the relationship of decommissioning and proposed SPNM areas.)

FYI, I attempted to open the map of the GWNF existing ROS inventory (February 2010) that is listed in key documents section on the web site. The link appears to be broken, and it would not open.

*Response: ROS classes were not allocated on the ground in Alternatives B through G. The ROS inventory was used to allocate other management prescriptions, some of the prescriptions have direction that will assure that the inventoried ROS class remains and others allow activities that could alter the ROS from the current inventory.*

- 20. (June 21)** In reviewing Table C12.19 *Cumulative Decadal Present Net Values of Benefits and Costs (millions of dollars, 4% discount rate cumulative to midpoint of 5th decade)*, on page 3-297 of the draft EIS, it struck me that all the present value costs by program and all the present value benefits by programs are expressed as a single value for each of the programs for each of the alternatives. However, the many of the objectives for the alternatives show a numerical range of activities. For example, the preferred alternative says that timber harvesting may range between 1800 acres and 3000 acres per year and that the prescribed burning program may range between 12,000 acres and 20,000 acres per year. It seems only reasonable to expect that the costs and the values from these activities would vary greatly depending on what level actually takes place, and therefore the PNV calculations would show a range of costs or benefits for each program instead of a single value. Could you explain or provide a process paper on how you arrive at a single number expressing the costs and the benefits over a five decade period when there may be a wide range of program activities on a yearly basis?

*Response:*

- 21. (June 23)** When is the next IDT meeting open to the public?

*Response: Replied in e-mail 6/28/11 that there will be no IDT meetings until after the 90 day comment period ends on Sept 1, 2011 and nothing has been scheduled yet.*

- 22. (July 5)** Your first objective for timber (on page 3-23 of the draft Plan) states:

*OBJ TIM-1: A total timber sale program quantity (TSPQ) of 3.8 to 5.4 million cubic feet (MMCF) [19 to 27 million board feet (MMBF)] is provided annually from lands suitable for timber production. This equates to about 1,800 to 3,000 acres per year. The maximum Allowable Sale Quantity (ASQ) for the first decade is 54.3 MMCF.*

In Appendix C of the draft Plan, Table C-3, on page C-4, shows:

<i>Total Allowable Sale Quantity</i>	<i>54.3 MMCF</i>
<i>Total Non-Scheduled Volume</i>	<i>0 MMCF</i>
<i>Total Timber Sale Program Quantity</i>	<i>54.3 MMCF</i>

Since there is no amount shown for non-scheduled volume, the allowable timber sale quantity (ASQ) is equal to the timber sale program quantity (TSPQ). Is it therefore correct that the variable timber sale quantity program in OBJ TIM 1 of 3.8 to 5.4 million cubic feet is also a allowable sale quantity of 3.8 to 5.4 MMCF annually?

[Response:](#)

- 23. (July 5)** I am still looking for maps that display the adopted ROS classes for each alternative. The standards for the preferred alternative (draft plan p. 4-18) make reference to a map of adopted ROS classes

*FW-160: FW-161: New structures and facilities are constructed and maintained to meet the adopted ROS class for the area.*

FW-162: Recreation opportunity maps will govern all new projects, including special uses. Existing conditions may not meet the assigned ROS classes.

Where are the maps?

*Response: See the answer to Questions 3 and 19. The standards FW-161 and FW-162 were brought forward from the Jefferson Plan by mistake since they do refer to adopted ROS and that concept is not used in this Draft Plan. This is covered in Errata #3.*

**24. (July 5)** The draft plan (p. 2-28) states:

*It is also necessary, at times, to decommission roads that are no longer required or are causing damage to other natural resources. About 160 miles of road have been identified as potentially available for decommissioning.*

If they have been identified, where are they? Where is the map?

*Response: The Forest Plan provides broad direction on road decommissioning and identifies an objective. Specific roads that would be decommissioned would be identified in a site specific analysis. The TAP does identify roads to be considered for decommissioning and these roads are identified by road number.*

**25. (July 5)** On page 3-262 of the draft EIS, the ASQ for the "no action" alternative (A) does not vary by decade.

Table C6.8 Allowable Sale Quantity for All Products by Decade (MMCF)

Alternative	Decade 1	Decade 2	Decade 3	Decade 4	Decade 5
A*	47	47	47	47	47
B	54.3	55.4	60.9	63.3	67.5
C	0	0	0	0	0
D	91.8	91.8	101.0	101.6	111.7
E	31.1	33.0	36.3	39.9	40.4
F	20.4	20.4	21.6	23.8	25.0
G	54.3	55.4	60.9	63.3	67.5

Why have you held the volume constant for the 1993 plan? The 1993 plan did increase volume by decade. Exactly how the 1993 volumes are to be converted to the 2011 conversion rate between cubic feet and board feet is problematic, but the methodology used should be transparent. To show no increase in volume for decades 2-5 for the no action alternative skews the present net value analyses.

[Response:](#)

**26. (July 6)** You state on page 2-6 of the draft EIS:

**ALTERNATIVE B**

*This alternative is based on changes to the current plan identified in the Analysis of the Management Situation. The analysis was based on an IDT evaluation of the 1993 Forest Plan direction, monitoring and evaluation results, new policies, best available science and an attempt to balance public issues that were identified as of March 2010.*

The suitable base in alternative B is 476,000 and the acres to be harvested annually range from 1,800 to 3,000. (draft EIS, p. 2-6).

However, in reviewing the Analysis of Management Situation document shown on the GWNF website, and the CER report on which the AMS was based, the suitability review recommends maintaining a suitable base between 350,000 and 370,000 acres.

*Tentative Options or Proposed Actions for Change*

C-1. a) *Strive to maintain at least the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres so as to maintain some capability to meet wildlife habitat, forest health, and the economic status of local community needs. (AMS, p. 115)*

Upon what documentation are you basing claim that the suitable base of 476,000 acres for alternative B is based on the AMS? Is there any other documentation not connected with the AMS on which you are basing your claim?

*Response: As quoted, the AMS recommended striving to maintain AT LEAST the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres. The 476,000 acres of forest suitable for timber production is greater than the range of 350,000 to 370,000 acres and so meets the goal of at least matching that level. After the discussion of the acreage, the AMS recommendation goes on to state:*

*b) Identify all of those NFS lands currently within MA 17 (Timber Production) but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Production.*

*c) Identify all of those NFS lands currently within other MA's but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Harvest. The identification of these areas helped to add to the suitable base of 476,000 acres.*

**27. (July 08)** I have read chapter 5 on monitoring in the draft GWNF plan. The paragraph that caught my attention is on page 5-3:

*The Monitoring and Evaluation Framework is part of the Forest Plan and is stated in terms that will direct what will be monitored, but are not so specific as to address how monitoring will be accomplished. The Monitoring and Evaluation Framework will be further refined during Forest Plan implementation into Monitoring Elements and Task Sheets, which are more detailed, specific and measurable than the monitoring questions themselves. Monitoring Elements and Task Sheets may be modified and prioritized to guide monitoring activities over the course of Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet (Appendix H) indicate the nature of Monitoring Elements and monitoring details that are to be further developed during Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet are presented here only for information and may be modified as needed to address changes in needs, priorities, availability of personnel and funding.*

On first reading, this appears to conflict with the requirements for monitoring established in the 1982 planning regulations, under which the GWNF is being prepared.

*(k) Monitoring and evaluation. At intervals established in the plan, implementation shall be evaluated on a sample basis to determine how well objectives have been met and how closely management standards and guidelines have been applied. Based upon this evaluation, the interdisciplinary team shall recommend to the Forest Supervisor such changes in management direction, revisions, or amendments to the forest plan as are deemed necessary. Monitoring requirements identified in the forest plan shall provide for--*

*(1) A quantitative estimate of performance comparing outputs and services with those projected by the forest plan;*

(2) Documentation of the measured prescriptions and effects, including significant changes in productivity of the land; and

(3) Documentation of costs associated with carrying out the planned management prescriptions as compared with costs estimated in the forest plan.

(4) A description of the following monitoring activities:

(i) The actions, effects, or resources to be measured, and the frequency of measurements;

(ii) Expected precision and reliability of the monitoring process; and

(iii) The time when evaluation will be reported.

(5) A determination of compliance with the following standards:

(i) Lands are adequately restocked as specified in the forest plan;

(ii) Lands identified as not suited for timber production are examined at least every 10 years to determine if they have become suited; and that, if determined suited, such lands are returned to timber production;

(iii) Maximum size limits for harvest areas are evaluated to determine whether such size limits should be continued; and

(iv) Destructive insects and disease organisms do not increase to potentially damaging levels following management activities.

Would you be so kind as to explain in some detail where in the draft GWNF plan the monitoring elements that are required under the 1982 regulations implementing NFMA are written out?

Could the problem stem, perhaps, from the fact that the draft plan's monitoring approach is derived from a publication entitled **LMP Monitoring and Evaluation: a Monitoring Framework to Support Land Management Planning (USFS 2007)**, which was developed at a time that the "Bush" planning rule was in effect? As you are well aware, however, that planning approach was struck down by the courts.

The question that occurs to me is: why not adopt the monitoring components of the 2004 JNF Plan? Aren't we striving for consistency in management approach between the two forests?

Response: The paragraph quoted from Chapter 5 is nearly identical to the paragraph in the Jefferson Forest Plan which was also prepared under the 1982 planning regulations. Monitoring elements are described in Appendix H of the Draft Forest Plan. The monitoring approach is derived, in part, from the referenced Forest Service publication, but monitoring approaches are not necessarily tied to specific planning rules. Appendix H is quite similar to the Jefferson Forest Plan to achieve better consistency.

## Loesel questions re: GWNF draft, with partial staff responses

1. (May 21) I'm trying to understand the dimensions of the timber program in each of the alternatives, especially as shown on table 2-17 on page 2-36 of the draft EIS. Can you help me by clarifying the following:

1. Karen said the ASQ for alternative A, which we had assumed for years was 330 MMBF for the decade, was adjusted to 235 MMBF due to a change in the official conversion ratio between cubic feet and board feet. I noticed at least one place where the ASQ for alternative A was still described as 33 MMBF per year. Is there some way to make certain that all the conversions are done (and made clear to the public what has been done) so there is no confusion about the volume associated with this alternative?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

2. Are ASQ figures for all the alternatives correct? Assuming that the ASQ as expressed in terms of cubic feet (rather than board feet) is correctly expressed in table 2-17 for all the alternatives, am I correct that the preferred alternative (alternative G) has an ASQ that is approximately 15% higher than the current plan (alternative A)?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

3. Are the acres suitable for timbering correct for all the alternatives in this table? Am I correct that the suitable base in the preferred alternative is approximately 25% higher than in the alternative modeling the current plan?

*Karen Responded on 6/6/11. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

Follow-up to 3 on 6/6/11. You did not directly answer my question #3 whether or not the suitable base figures used for alternatives displayed in the table were accurate. The errata sheet shows a suitable base for the preferred alternative of 439,000 acres. The FAQs uses a figure of 450,000. In other places in the documents, a variety of figures appear. Which of these figures is correct? I haven't gone through to check all the alternatives to see what variation may exist in various places in the documents, but I would not be surprised to find substantial variation in the suitable base figures for each alternative. Until there is a systematic examination of the documents and systematic correction to a single number to express the suitable base acreage for each alternative, I don't know how the public is supposed to know what the Forest Service is proposing, or how we can be expected to make substantive comments about the proposed action or the alternatives.

*Response: In the Summary document, page S-21 under Timber Harvest, the suitable acres should be 439,000 acres (not 440,000). In the FAQs document, page 1, the change in suitable acres should be to 439,000 acres (not 450,000). In the Draft Plan, pages 3-30 and page C-2, Total Suitable Land should be 439,000 acres (not 438,000) and Economically Inefficient Land should be 114,000 acres (not 115,000.) Changes will be identified to the public in Errata 3.*

4. The table shows that in alternative A the number of acres harvested to produce the ASQ of 47 MMCF is 30,000 acres over the first decade. The table also shows that for alternative G, the number of acres harvested to produce the ASQ of 54.3 MMCF is 18,000 acres. Since the ASQ for alternative G is approximately 15% higher than alternative A, I would expect that the number of acres needed to produce this higher volume would rise approximately 15% rather than fall by 40%. This table shows that alternative E also has 18,000 acres harvested, but it is associated with an ASQ of 31.1 MMCF. This is more what I would expect as the relationship between ASQ and acres harvested. Could you clarify? Is there an error in the figures? If not, are they based on Spectrum runs?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

2. **(May 28)** I called Ginny Williams last week with questions about the allocation of SIOs in the draft GWNF plan, and I have some additional questions about the management of scenery.

As I noted in my discussion with Ginny, the 1993 GWNF Plan (p.2-24, Table 2-5) allocates adopted VQOs as follows:

Preservation	46,000
Retention	379,000
Partial Retention	548,000
Modification	88,000

The current draft for the revised GWNF EIS for the Forest Plan includes a crosswalk between Visual Quality Objectives and Scenic Integrity Objectives in Table C5.1 on page 3-251 of the draft EIS.

I would expect that Alternative A, which models the current GW Plan as the No Action Alternative, would show the following SIOs:

Very High	46,000
High	379,000
Moderate	548,000
Low	88,000

However, in the current draft Plan for the GWNF, the allocation of SIOs for Alternative A, the 1993 GWNF Plan, is far different. See table C5.3 on page 252 of the draft EIS the acres (rounded) are as follows:

Very High	46,000
High	350,000
Moderate	203,000
Low	467,000

What accounts for the differences in portraying the allocation of VQOs/SIOs in the 1993 GWNF Plan?

I noticed that in table C5.3, the alternatives have varying acreage in the four SIO classes. On what basis are SIOs allocated in these alternatives to account for the varying figures?

*Response: The SIOs are determined from a combination of the Scenic Class and the Management Area Prescription as indicated in the standards for each Mgmt Area Rx. Therefore, the SIOs do vary*

between the alternatives, according to the alternative's Mgmt Area Rx allocations. Alternative A represents the current Forest Plan, but it was described in terms of the 2011 Management Prescription Areas rather than the 1993 Management Areas to facilitate comparison of alternatives. In regard to Scenic Integrity Objectives, the Management Prescription Areas differ from the 1993 Management Areas. In the DEIS we incorrectly used the 2011 Management Prescription Areas to describe the Scenic Integrity Objectives for Alternative A. We have identified these errors in Errata #3.

**3. (May 28)** In the 1993 Plan the allocation of ROS by acreage was:

SPNM	150,000
SPM	206,000
Roaded Natural	615,000
Roaded Modified	86,000

I could not find a table that compared the distribution of ROS classes among the various alternatives in the draft EIS. If there is a table that I missed, on what page is it located?

If this information is not included in the draft EIS, what is the distribution of ROS acreage that you used in your analyses?

In the 1993 Plan/EIS, there was a map of the ROS areas. Is there a similar map available for the draft alternatives?

The draft Plan gives a range of acreage in ROS classes. Why is there a range instead of a fixed number? Is there a visual display showing the areas that would be included/excluded in the upper or lower range of allocation?

*Response: The 1993 Forest Plan assigned, or "adopted" ROS classes for specific areas of the Forest. These were assigned differently in different alternatives. Unlike the 1993 Plan, the proposed Plan does not use adopted ROS classes so there is no variation between the alternatives. The ROS inventory acres are displayed in the first column of Table C1.10. There is an ROS map under the Maps category on the Key Documents section of the revision website. The range of acres by ROS class is displayed to acknowledge that areas currently inventoried as Semi-Primitive Motorized or Semi-Primitive Non-Motorized that are in Management Prescription Areas that allow road construction, could be potentially changed to Roaded Natural settings. This would occur after site specific analysis, so cannot be mapped. However, the only place this would occur is in Management Prescription Areas that allow road construction.*

**4. (May 28)** As you may recall from my presentations in the IDT meetings, I am interested in the budgets needed to implement the plan or alternatives.

I did not see any figures in the draft Plan or EIS about the budgets that would be needed to implement the various management activities. If there was such a discussion that I overlooked, could you give me the page(s) in the draft documents? If you did not include these in the draft EIS or Plan, did you calculate these when you were doing analysis of the various alternatives, and could you send the figures?

I also did not see any display of the budgets associated with management of the GWNF over the life of the current (1993) Plan. Are these figures available? If so, would you please send them?

*Response: Historical budgets since 1993 are included in Appendix E – Budgets and Accomplishment History in the Analysis of the Management Situation. The estimated program budgets for each alternative were used in the Present Net Value determinations discussed in Chapter 3 of the DEIS and in the economic input/output IMPLAN model estimates for contributions to jobs and income in the local economy. However, the budget estimates were not included in the DEIS itself but are presented below.*

Program Costs (M\$'s, average cost for first decade)	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
Timber	1,880	2,160	0	3,680	1,240	800	2,160
Roads/Engineering	1,353	1,358	1,151	1,468	1,330	1,283	1,358
Recreation	3,845	3,845	3,562	4,128	3,562	4,128	3,845
Wildlife	573	637	382	700	637	637	637
Soil, Water & Air	1,371	1,318	709	1,318	1,344	1,318	1,344
Fire	1,214	1,955	1,214	1,527	2,183	1,955	1,955
Lands	427	427	427	427	427	427	427
Range	10	10	10	10	10	10	10
Minerals	190	190	190	228	190	190	190
Planning, Inv., Monitoring	400	400	400	400	490	400	400

5. (May 28) You mentioned in the draft EIS that changes were made in the conversion ratio between cubic feet and board feet, so the 33 MMBF volume given for the 1993 GWNF Plan was adjusted downward. (Please note that you still list the volume for the 93 Plan as 33 MMBF at least once.)

What is the "old" conversion factor that was used in the 93 Plan and what is the current conversion factor?

Has that changed more than once since 1993?

How have figures used to report volume cut since 1993 (usually given in MMBF) been adjusted over time?

*Karen Responded on 6/6/11; The old conversion factor used in the 1993 GW Plan was 6.98 to go from MMCF to MMBF. At one point, it was 5.5 and now it is 5.0. As you can see in the Errata for the DEIS document, we did find that we were not consistent in using the same conversion factor in reporting volume sold over the years. However, Russ did look over the spreadsheet he has been keeping that reports volume cut since 1993 and there is a footnote on that one (started by Jim Sitton) where Jim was using the same conversion factor of 5.0 throughout the years. So Russ feels confident that the volume cut that he has given you in the past did adjust the volumes to a common conversion.*

6. (May 28) I was reading your write up in the draft Plan and EIS about roads, and I can't make out what you have in mind for road management. I guess I'm an old fashioned guy who needs a table for

the number of miles of open, seasonally open, and closed miles of road for each alternative. I didn't see such a table, but maybe you can point one out, or send me the figures.

*Response:*

7. (May 29) I've looked for the rotation ages for the various forest types, but I didn't see it in the documents.

What rotation ages were used in the Spectrum runs?

Are these rotation ages the same as the CMAI?

*Response:* Since the preferred alternative uses mgmt Rx 13 instead of the individual wildlife habitat and timber production Mgmt Rxs as in the 1993 Plan and the JNF Plan, we have forest-wide rotation ages that apply, as shown in standard FW-112, page 4-13 of the Draft Plan. The emphasis became the ecological system, not the Mgmt Rx in terms of the rotation age. The Northern Hardwoods ecological system would fit under the Cove Hardwoods in the rotation age table and the Spruce Fir ecological system would fit under the White Pines. The CMAI ages are found at the following standard FW-113.

For the alternatives that kept the individual wildlife habitat and timber production Mgmt Rxs (Alts A and D), the Spectrum rotation ages varied. For example, Mgmt Rx 8C (1993 MA 14) had longer rotations ages. For the alternatives that used Mgmt Rx 13 (Alts B, E, F, G), the rotation ages used for Mgmt Rx 13 in Spectrum were as listed in the FW-112 table 4.2 in the Plan. The following table of rotation ages used for each alternative in Spectrum will be added to Appendix B of the Final EIS.

**Rotation Ages for Mgmt Rxs Suitable for Timber Production by Alternative**

Rx Code	Rx Description	Alt A	Alt B	Alt D
7A1	Scenic Byway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
7B	Scenic Corridors and Viewsheds	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
7C	ATV Use Area	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90
7E	Dispersed Recreation Areas			
7E2	Dispersed Recreation Areas-Suitable for Timber Production	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
7F	Blue Ridge Parkway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
8A1	Mix of Successional Habitats	CVH, UPH 100-120 WPN, SYP, SO 80-100		CVH, UPH 100-120 WPN, SYP, SO 80-100
8B	Early Successional Habitats	CVH, UPH 80-100 WPN, SYP, SO 80-100		CVH, UPH 80-100 WPN, SYP, SO 80-100

8C	Black Bear/Remote Habitats	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100		CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
8E4b	Indiana Bat-Secondary Conservation Area	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
10B	Timber Production	CVH 70-90 UPH 80-100 WPN, SYP, SO 60-80		CVH 70-90 UPH 80-100 WPN, SYP, SO 60-80
13	Mosaics of Habitat-Suitable for Timber Production	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	
<b>Rx Code</b>	<b>Rx Description</b>	<b>Alt E</b>	<b>Alt F</b>	<b>Alt G</b>
7A1	Scenic Byway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7B	Scenic Corridors and Viewsheds	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7C	ATV Use Area	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7E	Dispersed Recreation Areas		CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7E2	Dispersed Recreation Areas-Suitable for Timber Production	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100		
7F	Blue Ridge Parkway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
8A1	Mix of Successional Habitats			
8B	Early Successional Habitats			
8C	Black Bear/Remote Habitats			
8E4b	Indiana Bat-Secondary Conservation Area	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
10B	Timber Production			
13	Mosaics of Habitat-Suitable for Timber Production	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100

UPH = Upland Hardwoods

SYP = Southern Yellow Pines

CVH = Cove Hardwoods

WP = White Pines

SO – Scarlet Oak

**8. (June 5)** Is your link to the EIS of the 1993 GWNF Plan broken? The 93 EIS won't open for me.

*Response: We checked the link and found it to be working.*

**9. (June 7)** I got an email from someone stating that the proposed plan shows a decline in ASQ from the 93 plan. I followed up to see where this notion had come from, and there it is in the Summary, page S-21. "The Plan objective is to slightly reduce the annual Allowable Sale Quantity (ASQ) from 6.6 to 5.4 million cubic feet (MMCF) [27 million board feet (MMBF)]." That seems at odds with other statements about the volume (in cubic feet) for the current plan. What are the correct figures?

Table 2-17 in the errata sheet needs to be corrected further.

**Table 2-17. Comparison of the Timber Harvest Issue by Alternative**

	Alternative						
	A	B	C	D	E	F	G
<b>Age Class Distribution in 2040</b>	Percent of Forested Acres						
0-10 (1% in 2010)	3	3	0	5	2	1	2
11-40 (9% in 2010)	7	7	1	10	5	3	5
41-80 (7% in 2010)	10	10	10	8	10	10	10
81-100 (36% in 2010)	1	1	1	1	1	1	1
101-130 (33% in 2010)	34	34	40	34	35	38	35
131-150 (8% in 2010)	25	25	27	24	26	26	26
150+ (6% in 2010)	20	20	21	18	21	21	21

The percent in forested acres for the preferred alternative (G) was based on a harvest rate of 1800 acres per year. You corrected the harvest rate to 3,000 acres per year for the preferred alternative, but you need to change the age class distribution to match alternative B, which has the same harvesting program as alternative G. You also need to go through the documents to correct any other tables/figures that have the incorrect age class distribution figures for the preferred alternative.

*Response: Regarding the statement made on page S-21 of the Summary document, we cannot determine where the 6.6 MMCF came from but it is in error and will be corrected in Errata 3. It should actually read that the Plan objective is to slightly increase the annual ASQ from 4.7 MMCF in the 1993 Plan to 5.4 MMCF.*

**10. (June 9)** Referring to Table 2-2. Land Allocation of Management Prescriptions by Alternative, on pages. 2-18 and 2-19 in the draft EIS:

I don't understand why the acres allocated to some prescriptions vary among the alternatives. Why is the acreage allocated to Wilderness (prescription 1A) not the same for all alternatives? The designated Wilderness hasn't changed, has it? Why is the acreage allocated to Research Natural Area not the same for all alternatives? Why is the acreage allocated to Mt. Pleasant National Scenic Area not the same for all alternatives? Why is the acreage allocated to the Blue Ridge Parkway not the same for all alternatives? Why is the acreage allocated to the Appalachian Trail Corridor not the same for all alternatives? Why is the acreage allocated to the Indiana Bat Secondary Habitat not the same for all alternative? Etc.

*Response: The difference between alternatives in acreage for Management Prescription Area 1A(Wilderness) is less than 60 acres, the difference for Research Natural Areas is 1 acre, the difference for Mt. Pleasant is less than 9 acres. For these areas the differences are inconsequential and due to minor errors in mapping the alternative in the Geographic Information System (GIS). The actual boundaries of these areas do not change by alternative. For the other areas, the acreage will change due to a hierarchy of mapping. For instance, the Appalachian Trail corridor will not be displayed, nor will its acreage be included in the total acreage of Management Prescription Area 4a if it is located within a recommended wilderness area. The hierarchy of mapping is explained on page 3-1 of the Plan for Table 3.1 but should have also been noted on page 2-18 of the DEIS for Table 2-2 and page S-11 of the Summary for Table 1. Since the recommended wilderness areas vary by alternative, the acreage of other areas will vary as well. The acres listed for each Management Prescription Area description in Chapter 4 of the Plan identifies the actual acres, regardless of the mapping hierarchy used in the alternative maps.*

- 11. (June 11)** In Table C6.13 Acres by Method of Harvest for the First 10 Years for all Harvest Methods on page 3-266 of the draft EIS, the number of acres cut over the decade in the preferred alternative (G) totals 34,000, which would equate to 3400 acres per year. Why is this number different from the 3000 acres of harvesting per year that is used in several other places in the draft plan and draft EIS to express the number of acres cut to produce the ASQ? Which number should be the authoritative number? The number of acres cut in the "no action" alternative (A), is 32,670, or 3267 per year, while the number in other places in the draft EIS to express the number of acres cut to produce the ASQ is 3,000 Which number should be the authoritative number for the "no action" alternative?

*Response: Table C6.13 displays the correct level of acres expected to be harvested. In several areas of the Draft EIS and Draft Plan the harvest level should have been labeled as the regeneration harvest level. These references did not include the acres to be thinned. We have identified these errors in Errata #3.*

- 12. (June 12)** Please help make sense out of Table 2-5. Projected Habitat Components at 10 Years by Alternative, on page 2-22 of the draft EIS. How can Alternative A, the no action alternative, have 4% in early successional habitat after 10 years while alternative G, the preferred alternative, has 2-3% in early successional habitat after 10 years, even though alternative G has more timber harvested than alternative A?

*Response: Table 2.5 was based on information from Table B2.11. Tables B2.11 and B2.12 have been updated in Errata #3 to properly reflect that the Early Successional Forest acres listed for Alternatives A and C include the acreage of early successional habitat expected from natural disturbances in addition to timber regeneration harvest, while the other alternatives only include the early successional habitat created by timber regeneration harvest. The Errata also corrects an error in the harvest level for Alternative F. In*

*adjusting for these factors, Table 2.5 has been updated to reflect the early successional habitat created by timber harvest and natural disturbances.*

- 13. (June 15)** I am looking at Table 2. *Summary of Effects of Alternatives*, on page S-14 of the Summary. The table shows that the "open woodland" habitat after 10 years for alternatives B, E, F, and G is 11%. Am I correct that this habitat is the result of prescribed burning? This same table shows that the prescribed burning levels for alternatives B, F, and G are in the range of 12,000 to 20,000 acres per year, and the level for alternative E is 20,000 acres. Since the effects are the same for B, E, F, and G, am I correct in my conclusion that the level of burning that is being described in the 11% figure is 20,000 acres? **Is there any effort to show the effects for alternatives B, F, and G if the rate of burning is somewhere between 12,000 acres and 20,000 acres?**

*Response: You are correct that this is the result of prescribed burning. Unless otherwise noted in the analysis, the higher number in the range is what was analyzed in the EIS. The effects of the lower end of the range (12,000) is reflected in the figures for Alternative D that had a range of 5,000 to 12,000 acres.*

- 14. (June 17)** While discussing the draft plan with the Washington Office, we discussed the SIOs for the various alternatives. I couldn't answer key questions because I didn't have any maps for alternatives. Are there maps that show SIOs by alternatives? If there are, are they displayed somewhere on the website? If not, could you send them to me electronically or put them up?

*Response: We do not have maps that show SIO's by alternative. A map of the SIO's associated with the Draft Plan (Alternative G) is posted in the Key Documents on the website. If we generate maps of SIO's by alternative we will post copies on the website.*

- 15. (June 19)** I'm having trouble making sense of the transportation (roads) planning in the draft documents. Perhaps you can help explain what you've done.

1. In the draft EIS discussion about roads in chapter 3, pages 3-272 and 3-273, there is no discussion of cost or environmental effects (esp. sediment) included for the various alternatives. Are these effects discussed elsewhere in the EIS?

*Response: Effects to and from roads are discussed in Chapter 3 in the sections on Geology, Climate, Soils, Air, Water, Terrestrial Species, Aquatic Species, Fire, Recreation, Cultural Resources, Wilderness/Roadless, Scenery, Minerals, and Social/Economic Resources. Costs are discussed in Question #4.*

2. There is reference to Travel Analysis Process (TAP), which appears to be the analysis "driving" the development of the minimum road system needed for each alternative. There is no explanation in the draft EIS for the methodology used to develop the road mileage for the different alternatives. If the alternative road mileage is derived from TAP analysis, why is there no link to TAP analysis or an appendix outlining this analysis?

*Response: The TAP Report and TAP data does appear as a link on the Forest Plan Revision website.*

3. In Table C 8.3, which displays the maintenance level of the roads, the "No Action" alternative (A), has a higher total road maintenance mileage (1852 miles) than the total miles of roads in the current system (1823 miles). How can that be?

*Response: The higher total mileage of roads is due to the fact that an estimated 29 miles of road would be constructed during the first decade under Alternative 1*

4. In the 1993 GWNF Plan, the total mileage of Forest Highways in Virginia and West Virginia was 797 miles. The draft EIS says that the current mileage of Forest Highways in Virginia and West Virginia is 804 miles. If only 7 miles of road maintenance was transferred from the responsibility of the GW to the two states over the last 18 years, what reason is there to assume that 107 miles will be transferred to maintenance by the States over the life of this plan, especially in light of the budget squeeze on state transportation budgets for the foreseeable future?

*Response: The DEIS states on page 3-272 " It is anticipated that at least a portion of the 107 miles of road will be upgraded and converted to a Forest Highway within the current Plan period." The Forest will work towards this goal. It is not expected that it will be achieved within 10 years.*

5. Table C 8.3 shows that the "No Action" alternative (A) includes 8 miles of roads maintained at level 5, whereas all other alternatives include only 5 miles of roads at level 5; the "No Action" alternative includes 97 miles of roads at level 4, whereas all other alternatives include 33 miles at this maintenance level; the "No Action" alternative includes 465 miles of maintenance level 3 roads, whereas the other alternatives have mileage that range from 297 to 313 miles. Since Table C 8.1 shows that in all alternatives, including the "No Action" alternative, the minimum road system does not include 50 miles of Special Uses or 107 miles of Forest Highways, what accounts for the large disparity between the "No Action" alternative and all other alternatives?

*Response: Table C 8.3 incorrectly included the Special Use road mileage and the Forest Highway mileage. The table is corrected in Errata #3. The remaining disparity is due to the lack of decommissioning in Alternative A.*

16. **(June 19)** In reviewing Table C1.14 Estimated Total Acres of Big & Small Game Emphasis Areas by Alternative (in thousands), alternative G shows 507 (thousand) acres in the suitable base. This is far more than the 439,000 (or 440,000 or 450,000) shown elsewhere in the documents. Alternative A, the "No Action" alternative, shows 371.3 (thousand) acres as suitable, which is more than the 360,000 acres in the 93 Plan's suitable base. Are these figures in error, or is there some other explanation?

*Response: This table is in error regarding suitable acres. The amount of are suitable for timber production is not needed in this table. It is corrected in Errata #3.*

17. **(June 19)** The draft Plan contains the following statements:

**OBJ REC-7: Maintain a total of at least 244 miles of open or seasonally open roads as high clearance roads to meet Off-Highway Vehicle user needs.**

**The mileage of roads maintained for high clearance vehicles (OHV) is estimated to be about 1,030 miles across the Forest, near current levels.**

**OBJ RDS-3: Maintain to standard a minimum of 75 miles of passenger car roads (OML 3-5) and a minimum of 105 miles of high clearance vehicle (OML 1-2) roads on an annual basis.**

Could you please clarify how many miles of roads are maintained suitable for high clearance vehicle use?

*Response: It is estimated that about 1,030 miles of road will be maintained at maintenance level 2 which is designed for high clearance vehicles. There is an objective to assure that at*

least 244 miles of these high clearance roads will be open, at least seasonally to meet the needs of OHV users. The third item refers to annual road maintenance activities as opposed to a total number of roads available for use at a specified maintenance level.

- 18. (June 21)** In analyzing developed recreation capacity, the draft EIS uses the measure of "Person at One Time" (PAOT). In Table C1.11 *Estimated Capacity (PAOTs) of Developed Recreation Areas by Alternative* on page 3-210, it is claimed that the "No Action" alternative (A) has a PAOT of 10,210. However, the 1993 GWNF Plan, which is supposed to be represented in alternative A, actually shows a PAOT of 16,200. See page 2-85 of the 1993 GWNF EIS. Do you agree that a correction needs to be made in the draft documents to reflect the correct figures for alternative A?

According to the 1993 EIS, the capacity **existing** in 1993 was 13,820 PAOT. See page 3-7 of the 1993 GWNF EIS. The PAOT capacity of 16,200 in the 1993 Plan was the result of substantial construction of new facilities.

In the preferred alternative for the new GWNF plan, the Forest Service is proposing a substantial reduction in developed recreation capacity. The POAT capacity in the preferred alternative (G) is only 10,720. See page 3-210 in the draft EIS. However, there is no explanation or analysis of this substantial reduction from capacity that existed in 1993. Do you agree that the Forest Service is proposing a substantial reduction in developed recreation capacity? Do you agree that the planning documents should include an analysis of where these reductions are taking place and the rationale for the reductions?

*Response: Table C1.11 is incorrect for Alternative A in that it did not include the planned construction of additional facilities. The table is corrected in Errata #3. The figures for Alternative A are different from those in the current plan to reflect that some facilities have been closed. Rather than proposing a substantial reduction in capacity, Alternative G reflects the current status, but without the planned additional construction in Alternative A. Additional explanation is included in Errata #3 (in Progress).*

- 19. (June 21)** Could you help me understand how ROS settings are guiding the planning of dispersed recreation in the draft GWNF plan/EIS? Alternative A, the "No Action" alternative, has a specific number of acres in six ROS classes, as described in Table 2-11, on page 2-40 of the 1993 Plan,

<u>ROS Class (Thousands of Acres)</u>	
Rural	2
Roaded Modified	86
Roaded Natural	613
Semi-primitive Motorized- 1	104
Semi-primitive Motorized-2	104
Semi-Primitive Non-Motorized	150

There is also a map in the planning records for the 1993 GW Plan that shows where these acres are to be allocated on the ground. There are also maps for the 2004 JNF Plan that show where the ROS class acres are allocated on the ground.

However, I did not see any maps that show where the ROS classes are allocated on the ground for alternatives B through G in the current revision documents. Did you prepare such maps? If not, how is the public to evaluate the adequacy of the various alternatives in making ROS allocations expressed in Objectives? (It would be particularly helpful to have ROS maps that also show roads that are candidates for decommissioning so the public could evaluate the relationship of decommissioning and proposed SPNM areas.)

FYI, I attempted to open the map of the GWNF existing ROS inventory (February 2010) that is listed in key documents section on the web site. The link appears to be broken, and it would not open.

*Response: ROS classes were not allocated on the ground in Alternatives B through G. The ROS inventory was used to allocate other management prescriptions, some of the prescriptions have direction that will assure that the inventoried ROS class remains and others allow activities that could alter the ROS from the current inventory.*

**20. (June 21)** In reviewing Table C12.19 *Cumulative Decadal Present Net Values of Benefits and Costs* (millions of dollars, 4% discount rate cumulative to midpoint of 5th decade), on page 3-297 of the draft EIS, it struck me that all the present value costs by program and all the present value benefits by programs are expressed as a single value for each of the programs for each of the alternatives. However, the many of the objectives for the alternatives show a numerical range of activities. For example, the preferred alternative says that timber harvesting may range between 1800 acres and 3000 acres per year and that the prescribed burning program may range between 12,000 acres and 20,000 acres per year. It seems only reasonable to expect that the costs and the values from these activities would vary greatly depending on what level actually takes place, and therefore the PNV calculations would show a range of costs or benefits for each program instead of a single value. Could you explain or provide a process paper on how you arrive at a single number expressing the costs and the benefits over a five decade period when there may be a wide range of program activities on a yearly basis?

*No Response:*

**21. (June 23)** When is the next IDT meeting open to the public?

*Response: Replied in e-mail 6/28/11 that there will be no IDT meetings until after the 90 day comment period ends on Sept 1, 2011 and nothing has been scheduled yet.*

**22. (July 5)** Your first objective for timber (on page 3-23 of the draft Plan) states:

*OBJ TIM-1: A total timber sale program quantity (TSPQ) of 3.8 to 5.4 million cubic feet (MMCF) [19 to 27 million board feet (MMBF)] is provided annually from lands suitable for timber production. This equates to about 1,800 to 3,000 acres per year. The maximum Allowable Sale Quantity (ASQ) for the first decade is 54.3 MMCF.*

In Appendix C of the draft Plan, Table C-3, on page C-4, shows:

<i>Total Allowable Sale Quantity</i>	<i>54.3 MMCF</i>
<i>Total Non-Scheduled Volume</i>	<i>0 MMCF</i>
<i>Total Timber Sale Program Quantity</i>	<i>54.3 MMCF</i>

Since there is no amount shown for non-scheduled volume, the allowable timber sale quantity (ASQ) is equal to the timber sale program quantity (TSPQ). Is it therefore correct that the variable timber sale quantity program in OBJ TIM 1 of 3.8 to 5.4 million cubic feet is also a allowable sale quantity of 3.8 to 5.4 MMCF annually?

*No Response:*

**23. (July 5)** I am still looking for maps that display the adopted ROS classes for each alternative. The standards for the preferred alternative (draft plan p. 4-18) make reference to a map of adopted ROS classes

*FW-160: FW-161: New structures and facilities are constructed and maintained to meet the adopted ROS class for the area.*

*FW-162: Recreation opportunity maps will govern all new projects, including special uses. Existing conditions may not meet the assigned ROS classes.*

Where are the maps?

*Response: See the answer to Questions 3 and 19. The standards FW-161 and FW-162 were brought forward from the Jefferson Plan by mistake since they do refer to adopted ROS and that concept is not used in this Draft Plan. This is covered in Errata #3.*

**24. (July 5)** The draft plan (p. 2-28) states:

*It is also necessary, at times, to decommission roads that are no longer required or are causing damage to other natural resources. About 160 miles of road have been identified as potentially available for decommissioning.*

If they have been identified, where are they? Where is the map?

*Response: The Forest Plan provides broad direction on road decommissioning and identifies an objective. Specific roads that would be decommissioned would be identified in a site specific analysis. The TAP does identify roads to be considered for decommissioning and these roads are identified by road number.*

**25. (July 5)** On page 3-262 of the draft EIS, the ASQ for the "no action" alternative (A) does not vary by decade.

Table C6.8 Allowable Sale Quantity for All Products by Decade (MMCF)

Alternative	Decade 1	Decade 2	Decade 3	Decade 4	Decade 5
A*	47	47	47	47	47
B	54.3	55.4	60.9	63.3	67.5
C	0	0	0	0	0
D	91.8	91.8	101.0	101.6	111.7
E	31.1	33.0	36.3	39.9	40.4
F	20.4	20.4	21.6	23.8	25.0
G	54.3	55.4	60.9	63.3	67.5

Why have you held the volume constant for the 1993 plan? The 1993 plan did increase volume by decade. Exactly how the 1993 volumes are to be converted to the 2011 conversion rate between cubic feet and board feet is problematic, but the methodology used should be transparent. To show no increase in volume for decades 2-5 for the no action alternative skews the present net value analyses.

*No Response:*

**26. (July 6)** You state on page 2-6 of the draft EIS:

## ALTERNATIVE B

*This alternative is based on changes to the current plan identified in the Analysis of the Management Situation. The analysis was based on an IDT evaluation of the 1993 Forest Plan direction, monitoring and evaluation results, new policies, best available science and an attempt to balance public issues that were identified as of March 2010.*

The suitable base in alternative B is 476,000 and the acres to be harvested annually range from 1,800 to 3,000. (draft EIS, p. 2-6).

However, in reviewing the Analysis of Management Situation document shown on the GWNF website, and the CER report on which the AMS was based, the suitability review recommends maintaining a suitable base between 350,000 and 370,000 acres.

### *Tentative Options or Proposed Actions for Change*

*C-1. a) Strive to maintain at least the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres so as to maintain some capability to meet wildlife habitat, forest health, and the economic status of local community needs. (AMS, p. 115)*

Upon what documentation are you basing claim that the suitable base of 476,000 acres for alternative B is based on the AMS? Is there any other documentation not connected with the AMS on which you are basing your claim?

*Response: As quoted, the AMS recommended striving to maintain AT LEAST the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres. The 476,000 acres of forest suitable for timber production is greater than the range of 350,000 to 370,000 acres and so meets the goal of at least matching that level. After the discussion of the acreage, the AMS recommendation goes on to state:*

*b) Identify all of those NFS lands currently within MA 17 (Timber Production) but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Production.*

*c) Identify all of those NFS lands currently within other MA's but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Harvest. The identification of these areas helped to add to the suitable base of 476,000 acres.*

**27. (July 08)** I have read chapter 5 on monitoring in the draft GWNF plan. The paragraph that caught my attention is on page 5-3:

*The Monitoring and Evaluation Framework is part of the Forest Plan and is stated in terms that will direct what will be monitored, but are not so specific as to address how monitoring will be accomplished. The Monitoring and Evaluation Framework will be further refined during Forest Plan implementation into Monitoring Elements and Task Sheets, which are more detailed, specific and measurable than the monitoring questions themselves. Monitoring Elements and Task Sheets may be modified and prioritized to guide monitoring activities over the course of Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet (Appendix H) indicate the nature of Monitoring Elements and monitoring details that are to be further developed during Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet are presented here only for information and may be modified as needed to address changes in needs, priorities, availability of personnel and funding.*

On first reading, this appears to conflict with the requirements for monitoring established in the 1982 planning regulations, under which the GWNF is being prepared.

*(k) Monitoring and evaluation. At intervals established in the plan, implementation shall be evaluated on a sample basis to determine how well objectives have been met and how closely*

*management standards and guidelines have been applied. Based upon this evaluation, the interdisciplinary team shall recommend to the Forest Supervisor such changes in management direction, revisions, or amendments to the forest plan as are deemed necessary. Monitoring requirements identified in the forest plan shall provide for--*

*(1) A quantitative estimate of performance comparing outputs and services with those projected by the forest plan;*

*(2) Documentation of the measured prescriptions and effects, including significant changes in productivity of the land; and*

*(3) Documentation of costs associated with carrying out the planned management prescriptions as compared with costs estimated in the forest plan.*

*(4) A description of the following monitoring activities:*

*(i) The actions, effects, or resources to be measured, and the frequency of measurements;*

*(ii) Expected precision and reliability of the monitoring process; and*

*(iii) The time when evaluation will be reported.*

*(5) A determination of compliance with the following standards:*

*(i) Lands are adequately restocked as specified in the forest plan;*

*(ii) Lands identified as not suited for timber production are examined at least every 10 years to determine if they have become suited; and that, if determined suited, such lands are returned to timber production;*

*(iii) Maximum size limits for harvest areas are evaluated to determine whether such size limits should be continued; and*

*(iv) Destructive insects and disease organisms do not increase to potentially damaging levels following management activities.*

Would you be so kind as to explain in some detail where in the draft GWNF plan the monitoring elements that are required under the 1982 regulations implementing NFMA are written out?

Could the problem stem, perhaps, from the fact that the draft plan's monitoring approach is derived from a publication entitled **LMP Monitoring and Evaluation: a Monitoring Framework to Support Land Management Planning (USFS 2007)**, which was developed at a time that the "Bush" planning rule was in effect? As you are well aware, however, that planning approach was struck down by the courts.

The question that occurs to me is: why not adopt the monitoring components of the 2004 JNF Plan? Aren't we striving for consistency in management approach between the two forests?

*Response: The paragraph quoted from Chapter 5 is nearly identical to the paragraph in the Jefferson Forest Plan which was also prepared under the 1982 planning regulations. Monitoring elements are described in Appendix H of the Draft Forest Plan. The monitoring approach is derived, in part, from the referenced Forest Service publication, but monitoring approaches are not necessarily tied to specific planning rules. Appendix H is quite similar to the Jefferson Forest Plan to achieve better consistency.*

**28. (July 20)** In your errata version 1 dated June 3, 2011, you show in table 2-17 acres harvested for the all alternatives. I believe you propose in errata version 3 to correct "acres harvested" to "regeneration acres harvested", and this change should be made in errata 1.

Assuming that the acres shown are regeneration acres, what is the source for the 30,000 acres you show for the first decade for alternative A, the no action alternative? Am I not correct that the EIS for the 1993 GWNF plan shows a far lower total for regeneration acreage, especially in table 3-29 on p. 3-119 of the EIS? Depending on what percentage of the group selection acreage is removed on an annual basis, would the total regeneration not be under 24,000 for the decade or approximately 2,400 acres per year? If this is the approximate acreage of regeneration for alternative A, would this not affect the amount of early successional acreage that is displayed elsewhere in the effects analysis, both for the first decade and also in later decades?

*No Response:*

**29. (July 21)** In looking further at errata version 1, it appears the figures for alternative G in table 2-17 need to be corrected.

Table 2-17. Comparison of the Timber Harvest Issue by Alternative

	Alternative						
	A	B	C	D	E	F	G
Age Class Distribution in 2040	Percent of Forested Acres						
0-10 (1% in 2010)	3	3	0	5	2	1	2
11-40 (9% in 2010)	7	7	1	10	5	3	5
41-80 (7% in 2010)	10	10	10	8	10	10	10
81-100 (36% in 2010)	1	1	1	1	1	1	1
101-130 (33% in 2010)	34	34	40	34	35	38	35
131-150 (8% in 2010)	25	25	27	24	26	26	26
150+ (6% in 2010)	20	20	21	18	21	21	21

Unless there is a huge increase in the timber harvesting in later decades for alternative A that far surpasses the harvesting in alternative G, the age class distribution for alternative G should be higher in the 0-10 age class than for alternative A. It appears the figures for alternative G match the distribution in alternative E, even though the harvesting is higher in alternative G than in alternative E. I also think the percentage of the forest in the 0-10 age class is higher in alternative B than alternative B, since the amount of regeneration cutting in alternative B is substantially higher in alternative A. Do you agree that these changes need to be made?

*No Response:*

**29.1 (July 22)** In reviewing the draft errata version 3, I reviewed table B2.11, shown below.

**Table B2.11 Projected Habitat components in acres and percentage of forested landscape at 10 years by alternative.**

Habitat Component	Current Conditions	%	Alt A*	%	Alt B	%	Alt C*	%	Alt D	%	Alt E	%	Alt F	%	Alt G	%
Early Successional Forest	30,539	3	46,829	4	18,000-30,000	2-3	16,888	2	30,000 - 50,000	3-5	18,000-30,000	2-3	10,000-18,000	2	18,000-30,000	2-3
Open Woodlands	20,202	2	52,026	5	117,000	11	18,241	2	87,740	8	117,000	11	117,000	11	117,000	11
Grassland/shrublands	5,000	.05	5,500	.05	7,000	.06	2,500	.02	6,000	.05	7,000	.06	7,000	.06	7,000	.06
Total acres of combined active management habitat components	55,741	5	87526	8	142,000-154,000	14-15	37,629	3	133,740-143,740	13-14	142,000-154,000	13-14	134,270-142,270	12-13	142,000-154,000	13-14
Mid- to late successional Hard Mast Producing Forest	940,286	90	923,810	89	928,810	89	953,762	92	911,742	88	935,772	90	943,833	91	924,757	89

**\*Alternative A includes both early successional habitat created through natural disturbances and through timber harvest. Alternative C includes only early successional habitat created through natural disturbances. Alternatives B, D, E, F, and G only display early successional habitat created through timber harvest.**

Please correct me if I have misinterpreted your table, but it seems to me you are saying that natural forces create an average of 1,888 acres per year, or 18,888 per decade, as shown in alternative C. As you noted, alternative C has no timber program, and the 18,888 acres of early successional habitat are created through natural disturbance. You also state in your footnote that in alternative A, the decade total of early successional habitat of 46,829 is a combination of timber harvesting and natural disturbance. You do not break out what portion of the 46,829 is attributable to natural disturbance, but is it not reasonable to assume that the forces of nature would create the same amount of early successional habitat that you report in alternative C?

Your footnote says that alternatives B, D, E, F, and G, include only early successional habitat created through timber harvesting. Is it not reasonable to assume that the forces of nature will also create approximately 18,888 acres of early successional habitat no matter under which alternative the GWNF is managed? Perhaps I missed it, but I don't recall a discussion in the EIS about the contribution of natural forces to creating early successional habitat. Please direct me to the discussion in the EIS if I missed it. From the (draft revised) table you have presented, it appears you are saying that there is just as much early successional habitat created under alternative C, which has no timber harvesting, as in alternative F. In either case, you get 2% of the forest in early successional habitat. This is counterintuitive, but perhaps you have some rational explanation.

*No Response:*

**30. (July 22)** In my question of May 28 about budgets, I asked:

*I also did not see any display of the budgets associated with management of the GWNF over the life of the current (1993) Plan. Are these figures available? If so, would you please send them?*

In your response of July 15, you said:

*Response: Historical budgets since 1993 are included in Appendix E – Budgets and Accomplishment History in the Analysis of the Management Situation.*

The budget information in Appendix E of the AMS is for the combined GWNF and JNF. This is not helpful in a discussion about the GW plan, and not what I asked for. There certainly should be figures for the GW before it was combined with the JNF, and you can use an appropriate methodology of your choice to come up with budget figures for the GW portion of the combined forests since then. This is what should be included in the planning documents, is it not?

*No Response:*

**31. (July 23)** I was reviewing further the preliminary answers you sent on July 15 to questions I had emailed over the last six weeks. As I noted in my email on May 28, the draft Plan and EIS documents contain no budgets that project how much money it would take to implement each of the alternatives, including alternative G which was the basis for the Plan. In your July 15 answer, you included some figures that you call program budgets that you used in developing PNV and Implan calculations.

First, these figures are incomplete. They do not include many of the budget line items needed to fund operation of the GWNF, as shown for the combined GW and JNF in appendix E in the AMS. Have you prepared planning budgets for all the alternatives that include all line items?

*No Response:*

Second, the amended and full budget figures should be included in the planning documents. While responding to my request for budget figures by sending them to me is appreciated, you did not make any effort to include any budget figures in the errata you were drafting. Full and accurate figures need to be disclosed to the public. Do you intend to include full budget figures in the final version of errata version 3?

*No Response:*

Third, as I read the 1982 planning regulations, you need to include full budget figures for the plan so that the annual budgets can be compared to the base plan budget to see how these costs compare. If this is not your interpretation of the planning regulation language, what is your interpretation?

*No Response:*

**32. (July 23)** Continuing my review of the answer you provided on July 15 to my May 28 question about the lack of budget information in the draft Plan and EIS:

As I noted in my email question (31), the budget figures you provided are partial in the line item categories covered. The budget figures you provided appear far too low to disclose how much money would be required to actually implement the various alternatives.

First, once you disclose the budgets actually used to manage the GW since 1993 are disclosed, it will be possible to compare historical real-dollar costs with the costs estimated to implement various alternatives proposed. The historical data should be adjusted with Consumer Price Index factors to reflect current dollars so we are comparing apples to apples.

*No Response:*

Second, it is possible to check the reality of the budget estimates for alternative A, which supposedly models the 1993 Plan. The EIS for the 1993 Plan discloses that the budget needed to implement the plan activities is \$15.2 million. (See graph 2-47 on page 2-82 of the EIS) When adjusted to current dollars using price indexing, this is slightly over \$22 million, according to my calculations. In the draft EIS, the budget estimated to implement alternative A (the 1993 Plan) is \$11,262,000. I would appreciate you double checking my figures, but my figures show that the budget you are proposing to implement the 1993 Plan is only half of what they calculated in 1993. I suggest going back in the process records for the 1993 Plan/EIS to see how they arrived at their figures and compare it with how you arrived at the figures you sent to me. Without reliable budget figures, it is impossible to do realistic PNV or Implan calculations, or provide a baseline against which future budgets can be compared as required in the 1982 regs pertaining to monitoring.

*No Response:*

**33. (July 23)** I asked on June 19:

3. In Table C 8.3, which displays the maintenance level of the roads, the "No Action" alternative (A), has a higher total road maintenance mileage (1852 miles) than the total miles of roads in the current system (1823 miles). How can that be?

You answered on July 15:

*Response: The higher total mileage of roads is due to the fact that an estimated 29 miles of road would be constructed during the first decade under Alternative 1.*

The 1993 Plan (the no action alternative) actually says:

*The amount of road construction needed to accomplish the timber management and wildlife habitat needs on suitable acres in the Revised Plan is estimated to be 5 to 8 miles of system roads every year during the 10 to 15 year period that the Revised Plan is in effect. This does not include reconstruction or maintenance of existing roads. Additional roads may be needed for a variety of reasons including access to new developed recreation sites, general forest access, and access to wildlife improvements. (p. 2-19)*

Would you like to guess again? 😊

*No Response:*

**34. (July 23)** On June 5 I asked:

Is your link to the EIS of the 1993 GWNF Plan broken?  
The 93 EIS won't open for me.

On July 15, you responded:

*We checked the link and found it to be working.*

Well, of course it was working. After I reported the problem, Karen fixed it. She sent me the following email on June 6, the day after I reported the problem :

*Good morning Jim -  
I fixed the link so it should be working now. Thanks for letting us know. \*Karen*

She sent a copy of this message to you, Ken.

Don't you think it is appropriate to give credit to Karen for her quick response?

*No Response:*

**35. (July 24)** I am still trying to make sense of the Transportation Analysis Process. I had written to you on July 9:

The draft plan (p. 2-28) states:

*It is also necessary, at times, to decommission roads that are no longer required or are causing damage to other natural resources. About 160 miles of road have been identified as potentially available for decommissioning.*

If they have been identified, where are they? Where is the map?

You responded on July 15:

*Response: The Forest Plan provides broad direction on road decommissioning and identifies an objective. Specific roads that would be decommissioned would be identified in a site specific analysis. The TAP does identify roads to be considered for decommissioning and these roads are identified by road number.*

I did find a link to the **George Washington National Forest Travel Analysis Process (TAP)** document at the bottom of the “key documents” section of the website. On the first page of the report there is a table of contents, which clearly states that Appendix A contains the Minimum Road System Maps. There was no Appendix A included in the document posted on the website. So, where are the maps?

*No Response:*

**36. (July 24)** Reading further in the Transportation Analysis Process (TAP) report and the spreadsheets, I don't see how this process is used to develop the estimated road network needed to implement each of the alternatives outlined in the EIS. The TAP recommendations appear to stand as an independent analysis rather than an analysis that is used to calculate how many miles of roads are needed for each alternative. The TAP identification of 158 miles of roads that should be decommissioned is developed independent of analysis of any alternative. It seems to me that alternative C, which has no timber program, would decommission far more roads (which are not needed for timber harvesting) than the preferred alternative, which is maintaining a timber base of 439,000 acres. Yet, both call for decommissioning 160 miles of road. Alternative C does call for the decommissioning of additional roads located in roadless areas that are recommended for Wilderness. However, roads that are located in roadless areas are not servicing areas that are part of the timber base, so the call for decommissioning of roads in roadless areas is not connected to any consideration of a road system needed to access timber. However, maybe I missed something. Was there a discussion in the TAP documents about the road system needed for each alternative? Was there some analysis other than TAP that led to the figures for a road network needed to implement each alternative outlined in the EIS?

*No Response:*

**37. (July 24)** In the Frequently Asked Questions, the question is asked:

**5. Why does the Draft Plan maintain the same level of timber harvest, when recent budgets have not funded the levels in the current plan?**

Of course this is question based on a false premise and misleads the public. The level of timber harvesting in the draft plan **increases** over the timber harvesting level in the 1993 (current) plan. What accounts for this misstatement, and why has it not been corrected?

*No Response:*

**38. (July 24)** In my July email, I asked:

*Would you be so kind as to explain in some detail where in the draft GWNF plan the monitoring elements that are required under the 1982 regulations implementing NFMA are written out?*

This was not addressed in your response of July 15. Perhaps my question did not stand out sufficiently to merit attention. Would it help if I emphasized the importance of receiving an answer to my question by "shouting" it in capital letters? Let's see if this helps:

**WOULD YOU BE SO KIND AS TO EXPLAIN IN SOME DETAIL WHERE IN THE DRAFT GWNF PLAN THE MONITORING ELEMENTS THAT ARE REQUIRED UNDER THE 1983 REGULATIONS IMPLEMENTING NFMA ARE WRITTEN OUT?**

*No Response:*

**39. (July 25)** Is there a cumulative map that shows the acres that were burned by prescribed burning, especially since the 1993 plan was implemented?

Is there a cumulative map that shows the acres that were burned by wildfire, especially since the 1993 plan was implemented?

Is there a cumulative map that shows the acres that were harvested, especially since the 1993 plan was implemented?

Is there a cumulative map that shows where early succession habitat was created by natural forces, especially since the 1993 plan was implemented?

If yes, could be put them online? If not, would not it be important to begin this mapping for aid in future planning?

*No Response:*

**40. (July 26)** I've begun looking at the information in the draft plan and EIS pertaining to PNV calculations, IMPLAN, and Spectrum analysis in preparation for the Monday meeting. In order to get through all the information in one day, it would be helpful if you sent me some of the necessary background information.

1. The costs and revenue data for timber that you have presented combines the GWNF with the JNF. According to my addition, the total costs over 15 years was \$37.6 million, or an average of \$2.5 million per year. Again according to my addition, the timber revenues over 14 years was \$25.0 million, for an average of 1.8 million. Although the portion of the total costs and revenues attributable only to the GW, we do know that there are portions of the JNF, especially the Clinch and Glenwood areas, have higher site indices than most parts of the GW. On the face of it, the GW is a "below-cost" forest, and it would be expected that the PNV for all the alternatives would be negatives. It would be helpful to provide in advance of the Monday meeting those process records that lead you to the conclusion that a positive PNV is reasonable. Can you send those to me electronically?

*No Response:*

2. The process records for the 1993 PNV calculations would be helpful to compare and contrast with the current analysis. It would be particularly helpful to seeing how your calculations for A (the no action alternative) compare and contrast with the plan (alternative 8A) in 1993. Could you send those to me electronically?

*No Response:*

3. You have sent me budget figures on July 15 that you say were used in economic analysis in the current process. Many of these figures do not look reasonable in light of the past budget data for the GWNF/JNF. You provide me with background information that shows how you arrived at these figures?

*No Response:*

Thanking you in advance for your assistance.

**41. (July 26)** On page C-6 of Appendix C of the Draft Plan, you state:

*Since, on a given harvest entry, only a small portion of a stand's tree density is harvested, the cutting cycles generally result in lower per acre volumes and possible lower total*

*volume, thus reducing the total stumpage value for the harvested products (timber sale revenues are returned to the U.S. Treasury).*

Is there any documentary evidence to support this statement? If so, please send cite it.

*No Response:*

**42. (July 27)** In preparation for our meeting on Monday I've been reviewing the JNF process, especially Appendix B of the EIS. I had forgotten--it is bereft of detail. Since much of the analysis that you have outlined in the draft of the GWNF documents is based on the models and values developed in the JNF process, it would be helpful for our discussions to get out the JNF process records so we can refer to them. Are these available in electronic form so you can send them to me in advance and help me to focus the questions that are relevant?

**42a. (July 27)** In a message dated 7/27/2011 11:09:29 A.M. Eastern Daylight Time, kovercash@fs.fed.us writes:

Jim -

I really do not have the time to send you all of the materials you have requested per Questions 40 and 42 before Monday's meeting, that's why this week was not one of the choices of days I sent to you as being available to get together. We can either: 1) meet on Monday as is or 2) postpone until a later date and I can work on sending you the materials requested on Monday instead. \*Karen

**42b. (July 27)** We can meet on Monday and get done what we can, and then figure out how to proceed from there. September 1 is fast approaching.

*No Response:*

**43. (July 30)** On page B-23 of Appendix B to the EIS, there is a heading for **Sediment Effects Analysis**. On the following two pages there is a discussion about soil productivity, but no where in that section, or any other part of that appendix, did I see a discussion of sediment yield. Where is the discussion of the methodology used to calculate the effects of sediment deposition? And where are the results of such methodology? I saw no tables comparing the sediment yields for each of the alternatives.

*No Response:*

**44. (August**

**45. (August 4)** Look further at your spread sheet, I noticed that you had budget figures for 2009 for the GWNF/JNF in column I. The total was \$21,724,484.41. That is different from the 2009 budget figures for the two forests presented in the AMS, where it is \$28,473,639. The two should be the same, shouldn't they? If the AMS figure is not correct, it calls into question all of the other figures for past years, which I hope is not the case. I hope you'll be able to correct and send sometime today.

JIM

*No Response:*

In a message dated 8/3/2011 9:52:45 A.M. Eastern Daylight Time, klandgraf@fs.fed.us writes:

Jim,

Friday morning would be fine, let's plan from 9:00 till 11:00. Here is a spreadsheet to evaluate the costs of Alt A that we have been working on.

## **ERRATA FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT – Version 1**

**June 3, 2011**

### **Page 2-5, Alternative A-No Action Alternative:**

**Timber Harvest:** The Allowable Sale Quantity (ASQ) was shown as 4.73 million cubic feet (MMCF) or 33 million board feet (MMBF) per year in the 1993 Forest Plan. The timber yield tables used to determine that ASQ were in MMCF and a conversion factor of 6.98 was used at that time to convert from MMCF to MMBF. Today we use a conversion factor of 5.0, so to compare the ASQ in MMBF across all of the alternatives, the ASQ expressed in MMBF per year for Alternative A (which represents the 1993 Plan) should actually be shown as 23.5 MMBF. The suitable acres should be 350,000 acres. The actual average harvest program over the last 10 years should be 904 acres/year.

### **Page 2-7, Alternative B:**

**Timber Harvest:** The ASQ should be 27.1 MMBF/year. Suitable acres should be 486,000 acres.

### **Page 2-10, Alternative D:**

**Timber Harvest:** The ASQ should be 45.9 MMBF/year. Suitable acres should be 482,000 acres.

**Page 2-12, Alternative E:**

**Timber Harvest:** The ASQ should be 15.5 MMBF/year. Suitable acres should be 366,000 acres.

**Page 2-12, Alternative F:**

**Timber Harvest:** The ASQ should be 10.2 MMBF/year. Suitable acres should be 278,000 acres.

**Page 2-17, Alternative G:**

**Timber Harvest:** The ASQ should be 27.1 MMBF/year. Suitable acres should be 439,000 acres.

**Page 2-21, Table 2-2. Land Allocation of Management Prescriptions by Alternative:**

For Alternative F only, the southern portion of the Big Schloss Potential Wilderness Area should have been mapped as a 12D Remote Backcountry management prescription (not a 4FA Recommended National Scenic Area management prescription). Therefore within the table, the acreage for Alternative F, the acres for Rx 4FA should be corrected to 107,717 (not 127,940) and the acres for Rx 12D should be corrected to 167,845 (not 147,622).

**Page 2-36, Table 2-17 Comparison of the Timber Harvest Issue by Alternative:**

The Allowable Sale Quantity (Total First Decade) for Alternative D should be 459 MMBF (not 505 MMBF) and 91.8 MMCF (not 101 MMCF). The Acres Harvested (Total First Decade, thousands) for Alternative G should be 30 (not 18). The objective for acres harvested is a range of 18,000-30,000 per decade for Alternative G. Since the Allowable Sale Quantity (ASQ) is the maximum amount of timber that may be sold, it was determined using the upper range of the harvested acres objective.

**Table 2-17. Comparison of the Timber Harvest Issue by Alternative**

	Alternative						
	A	B	C	D	E	F	G
<b>Age Class Distribution in 2040</b>	Percent of Forested Acres						
0-10 (1% in 2010)	3	3	0	5	2	1	2
11-40 (9% in 2010)	7	7	1	10	5	3	5
41-80 (7% in 2010)	10	10	10	8	10	10	10
81-100 (36% in 2010)	1	1	1	1	1	1	1
101-130 (33% in 2010)	34	34	40	34	35	38	35
131-150 (8% in 2010)	25	25	27	24	26	26	26
150+ (6% in 2010)	20	20	21	18	21	21	21
<b>Timber Management</b>	Acres In Thousands						
Lands Suitable for Timber Production	350	486	0	482	366	278	439
<b>Acres Harvested (Total First Decade)</b>	Acres In Thousands						
	30	30	0	42	18	10	<b>30</b>
<b>Allowable Sale Quantity (Total First Decade)</b>	MMBF						
	235	271	0	<b>459</b>	155	102	271
<b>Allowable Sale Quantity (Total First Decade)</b>	MMCF						
	47	54.3	0	<b>91.8</b>	31.1	20.4	54.3
<b>Timber Sale Program Quantity as a Percent of Demand</b>	Percent of Current Annual Demand of GWNF Timber						
	18	21	0	36	12	8	21

**Page 3-254, Table C5.6 Estimated Harvest Acres and Allowable Sale Quantity for Timber Management Activities by Alternative, First Decade:**

The acres harvested, in thousands, first decade for Alternative A should be 30 (not 23).

**Page 3-258, Table C6.4 Total Timber Volume Sold:**

For FY 1993 – FY 2005, timber volumes were reported by the Forest Service in thousand board feet (MBF). In FY 2006, the Forest Service switched to using hundred cubic feet (CCF). In the table presented on page 3-258, a conversion factor of 1.818 had been used to convert MBF to CCF for FY 1993 – FY 2005. However, a conversion factor of 0.55 had been used to convert CCF to MBF from FY 2006 – FY 2009. In order to compare the total timber volume sold in the same conversion factor over time, the table should read as follows:

**Table C6.4 Total Timber Volume Sold**

FY	CCF	MBF
1993	<b>68,118</b>	34,059
1994	<b>58,550</b>	29,275
1995	<b>52,122</b>	26,061
1996	<b>41,074</b>	20,537
1997	<b>38,436</b>	19,218
1998	<b>16,876</b>	8,438
1999	<b>30,086</b>	15,043
2000	<b>20,202</b>	10,101
2001	<b>24,886</b>	12,443
2002	<b>26,994</b>	13,497
2003	<b>24,210</b>	12,105
2004	<b>36,814</b>	18,407
2005	<b>23,550</b>	11,775
2006	22,047	<b>11,023</b>
2007	16,362	<b>8,181</b>
2008	22,416	<b>11,208</b>
2009	16,403	<b>8,201</b>

**Page 3-261, third paragraph under Allowable Sale Quantity:**

Should read “These alternatives have ASQs ranging from 0 to 91.8 (not 101) mmcf per decade.”

**Page 3.262, Table C6.7 Allowable Sale Quantity for all Products (MMCF) by Decade:**

The title for the table should be “Allowable Sale Quantity for all Products (MMCF) for the First Decade.” The ASQ in MMCF for Alternative D should be 91.8 (not 101) and in MMBF the ASQ should be 459 MMBF (not 505).

**Page S-12, Table 1. Allocation of Lands to Management Prescription Areas:**

For Alternative F only, the southern portion of the Big Schloss Potential Wilderness Area should have been mapped as a 12D Remote Backcountry management prescription (not a 4FA Recommended National Scenic Area management prescription). Therefore within the table, the acreage for Alternative F, the acres for Rx 4FA should be corrected to 107,717 (not 127,940) and the acres for Rx 12D should be corrected to 167,845 (not 147,622).

**Page S-16, Table 2. Summary of Effects of Alternatives:**

Under the Timber Issue, the Allowable Sale Quantity (Total First Decade) for Alternative D should be 459 MMBF (not 505 MMBF) and 91.8 MMCF (not 101 MMCF). The Acres Harvested (Total First Decade, thousands) for Alternative G should be 30 (not 18). The objective for acres harvested is a range of 18,000-30,000 per decade for Alternative G. Since the Allowable Sale Quantity (ASQ) is the maximum amount of timber that may be sold, it was determined using the upper range of the harvested acres objective.

**Errata Version 2 (June 17, 2011) - Capability and Availability Evaluation by Potential Wilderness Area, DEIS Appendix C, Table C-1**

(20 page PDF table does not copy)

# (DRAFT) ERRATA FOR THE DRAFT DOCUMENTS – Version 3 July xx, 2011

## ERRATA FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

**A. The following changes are made to properly distinguish the acres of timber harvest versus the acres of regeneration through timber harvest. This means that timber harvest as a result of thinning is not included in the regeneration acres. The number of acres planned for thinning is displayed in Table C6.13 and ranges from about 170 acres per year in Alternative A to about 400 acres per year. This thinning is in addition to the acres of annual regeneration harvest.**

**DEIS Page 2-5, Alternative A-No Action Alternative:**

**Timber Harvest:** Annual **regeneration** harvest program of 3,000 acres.

**DEIS Page 2-6, Alternative B:**

**Timber Harvest:** Annual **regeneration** harvest program of 1,800-3,000 acres.

**DEIS Page 2-10, Alternative D:**

**Timber Harvest:** ASQ higher than current plan to meet an annual **regeneration** harvest program of 3,000 - 5,000 acres/year.

**DEIS Page 2-12, Alternative E:**

**Timber Harvest:** Annual **regeneration** harvest program of 1,800-3,000 acres.

**DEIS Page 2-12, Alternative F:**

**Timber Harvest:** Annual **regeneration** harvest program of 1,000-1,800 acres.

**DEIS Page 2-17, Alternative G:**

**Timber Harvest:** Annual **regeneration** harvest program of 1,800-3,000 acres.

Table 2-17. Comparison of the Timber Harvest Issue by Alternative

	Alternative						
	A	B	C	D	E	F	G
<b>Age Class Distribution in 2040</b>	Percent of Forested Acres						
0-10 (1% in 2010)	3	3	0	5	2	1	2
11-40 (9% in 2010)	7	7	1	10	5	3	5
41-80 (7% in 2010)	10	10	10	8	10	10	10
81-100 (36% in 2010)	1	1	1	1	1	1	1
101-130 (33% in 2010)	34	34	40	34	35	38	35
131-150 (8% in 2010)	25	25	27	24	26	26	26
150+ (6% in 2010)	20	20	21	18	21	21	21
<b>Timber Management</b>	Acres In Thousands						
Lands Suitable for Timber Production	350	486	0	482	366	278	439
	Acres In Thousands						

<b>Regeneration Harvest Acres (Total First Decade)</b>	30	30	0	42	18	10	<b>30</b>
<b>Allowable Sale Quantity (Total First Decade)</b>	MMBF						
	235	271	0	<b>459</b>	155	102	271
<b>Allowable Sale Quantity (Total First Decade)</b>	MMCF						
	47	54.3	0	<b>91.8</b>	31.1	20.4	54.3
<b>Timber Sale Program Quantity as a Percent of Demand</b>	Percent of Current Annual Demand of GWNF Timber						
	18	21	0	36	12	8	21

**DEIS Page 3-105, Table B2.10**

Table B2.10 Planned Annual Activities in acres, by Alternative

Active management activities	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
Timber <b>Regeneration</b> harvest	3,000	1,800-3,000	0	3,000-5,000	1,800-3,000	1,800-3,000	1,800-3,000
Prescribed fire	3,000	12,000-20,000	0	5,000-12,000	20,000	12,000-20,000	12,000-20,000
Grassland/shrubland restoration and maintenance	407	622	292	722	652	622	652
Temporary wildlife openings	120	250	0	250	250	250	250

**DEIS Page 3-254, Table C5.6**

Table C5.6 Estimated Harvest Acres and Allowable Sale Quantity for Timber Management Activities by Alternative, First Decade

	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
Acres of <b>Regeneration</b> Harvest, in	<b>30</b>	30	0	42.5	18	10	30

	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
thousands, first decade							
Allowable Sale Quantity, in million cubic feet, first decade	47	54.3	0	101	31.1	20.4	54.3

**B. The following changes are made to correct errors in the amount of early successional forest**

**DEIS Page 2-22, Table 2.5, change to:**

**Table 2-5. Projected Habitat Components at 10 Years by Alternative**

Habitat Component	Current Condition	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
Early Successional Forest	3%	4%	3-4%	2%	4-6%	3-4%	3%	3-4%
Open Woodlands	2%	5%	11%	2%	8%	11%	11%	11%
Grassland/Shrublands	0.05%	0.05%	0.06%	0.02%	0.05%	0.06%	0.06%	0.06%
Mid- to late successional Hard Mast Producing Forest	90%	89%	89%	92%	88%	90%	91%	89%
Total acres of combined active management habitat components	5%	8%	14 - 15%	3%	13- 14%	13- 14%	12 - 13%	13- 14%

**DEIS Page 3-108, Table B2.11, change to:**

Table B2.11 Projected Habitat components in acres and percentage of forested landscape at 10 years by alternative.

Habitat Component	Current Conditions	%	Alt A*	%	Alt B	%	Alt C*	%	Alt D	%	Alt E	%	Alt F	%	Alt G	%
Early Successional Forest	30,539	3	46,829	4	18,000-30,000	2-3	16,888	2	30,000 - 50,000	3-5	18,000-30,000	2-3	10,000-18,000	2	18,000-30,000	2-3
Open Woodlands	20,202	2	52,026	5	117,000	11	18,241	2	87,740	8	117,000	11	117,000	11	117,000	11
Grassland/shrublands	5,000	.05	5,500	.05	7,000	.06	2,500	.02	6,000	.05	7,000	.06	7,000	.06	7,000	.06
Total acres of combined active management habitat components	55,741	5	87,526	8	142,000-154,000	14-15	37,629	3	133,740-143,740	13-14	142,000-154,000	13-14	134,270-142,270	12-13	142,000-154,000	13-14
Mid- to late successional Hard Mast Producing Forest	940,286	90	923,810	89	928,810	89	953,762	92	911,742	88	935,772	90	943,833	91	924,757	89

**\*Alternative A includes both early successional habitat created through natural disturbances and through timber harvest. Alternative C includes only early successional habitat created through natural disturbances. Alternatives B, D, E, F, and G only display early successional habitat created through timber harvest.**

**DEIS Page 3-109, Table B2.12, change to:**

Table B2.12 Projected Habitat components in acres and percentage of forested landscape at 50 years by alternative.

Habitat Component	Current Conditions	%	Alt A*	%	Alt B	%	Alt C*	%	Alt D	%	Alt E	%	Alt F	%	Alt G	%
Early Successional Forest	30,539	3	46,829	4	18,000-30,000	2-3	16888	2	30,000 - 50,000	3 - 5	18,000-30,000	2-3	10,000-18,000	2	18,000-30,000	2-3
Open Woodlands	20,202	2	61,969	6	190,049	18	19,249	2	127,921	12	190,049	18	190,057	18	190,049	18
Grassland/shrublands	5,000	.05	6,100	.05	8,662	.08	2,815	.02	7,419	.07	8,662	.08	8,662	.08	8,662	.08
Total acres of combined active management habitat components	55,741	5	114,898	11	216,711-228,711	21-22	38,952	3	165,340-185,340	16-17	216,711-228,711	21-22	208,719-216,719	20	216,711-228,711	21-22
Mid- to late successional Hard Mast Producing Forest	940,286	90	924,220	89	924,220	89	953,762	92	904,509	87	935,762	90	943,786	91	924,220	89

**\*Alternative A includes both early successional habitat created through natural disturbances and through timber harvest. Alternative C includes only early successional habitat created through natural disturbances. Alternatives B, D, E, F, and G only display early successional habitat created through timber harvest.**

**C. The following changes correct an error in unsuitable lands.**

**DEIS Page 3-214, Table C1.14, Delete the row identifying lands unsuitable for timber harvest; change to:**

Type of Game Habitat (Management Prescription Area)	Rx Area	ALT A	ALT B	ALT C	ALT D	ALT E	ALT F	ALT G
Mix of Successional Habitats	8A1	258	0	0	316.9	0	0	0
	8A1U	69.7	0	0	0	0	0	0
Early Successional Habitat	8B	38.9	0	0	34.0	0	0	0
	8BU	0.8	0	0	0	0	0	0
Bear/Remote Habitat	8C	74.4	0	0	124.8	0	0	0
	8CU	61.2	0	0	0	0	0	0
Mosaic of Habitats	13	0	568.9	0	0	491.8	350.4	507.0
	13U	0	0	245.7	0	3.3	108.8	0
TOTAL ACRES		503.0	568.9	245.7	475.7	495.1	459.3	507.0
% of GWNF (approx.)		47%	53%	23%	45%	46%	43%	48%

**D. The following changes correct an error in road mileage.**

**DEIS Page 3-273, Table C8.3, Change to:**

	Alternative Miles						
	A	B	C	D	E	F	G
Maintenance Level 1 - Closed in storage for future use	245	140	105	155	146	140	155
Maintenance Level 2 - High Clearance, seasonal or admin	987	1,042	943	1,119	1,029	1,015	1,029
Maintenance Level 3 - Passenger Car	408	301	297	313	301	302	301
Maintenance Level 4 - Passenger Car, collector	47	33	33	33	33	33	33
Maintenance Level 5 - Passenger Car, 2-lane, paved, arterial	8	5	5	5	5	5	5

**D. The following changes correct errors in the Scenery analysis.**

**DEIS Pages 3-250 to 3-25, Change to:**

## C5- SCENERY

### DIRECT, INDIRECT AND CUMULATIVE EFFECTS

Table C5.3 Scenic Integrity Objectives (SIOs) by Alternative (Acres)

SIO	Alt A*	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
VH	46,000	45,028	44,972	44,972	44,972	44,970	44,971
H	379,000	374,408	594,472	379,210	450,269	499,890	432,963
M	548,000	199,216	237,678	196,132	178,843	160,927	182,157
L	88,000	446,776	188,343	445,151	391,381	359,676	405,374

\*No Action Alternative

Alternatives that receive the most acres assigned SIOs of Very High and High would result in more protection of the scenic resources than alternatives having fewer acres assigned to the higher SIOs.

Alternative A assigns the most acres to the Very High SIO, but the difference between alternatives with regards to acres assigned to the Very High SIO is negligible.

Alternative C assigns the most acres to the High SIO. The majority of those, 386,786 acres, are in the Recommended Wilderness Study prescription. For those acres that Congress designates Wilderness, the SIO would change to Very High. Alternative C provides the best protection of the current scenic integrity with primarily intact forest canopies. Alternatives F, E and G, in that order, assign the next most acres to the High SIO.

Alternative A assigns the most acres to the Moderate SIO, followed by Alternatives B, C and D.

Alternatives B, D and G assign the most acres to the Low SIO and provide the least protection for the current scenic integrity of primarily intact forest canopies. However, two of these alternatives, B and G, contain prescription area 13 that includes a landscape character goal of restoring the role that fire once played in the ecosystem, including the influence it had on scenery. This landscape was characterized by open woodlands which retained a natural, forested appearance interspersed with a mosaic of natural openings. Fire suppression has largely altered these once natural occurring openings, but lands assigned to prescription area 13 in Alternatives B and G would restore them to some degree.

All alternatives propose prescribed burning, as detailed in Table C5.4 below. Drifting smoke, blackened rock outcrops and charred tree trunks would be the main obvious visual effect. Visual contrast from fireline construction could also be evident. The

contrast levels and duration vary with fire intensity. Blackened vegetation usually last a short time but charring of trees may be evident for many years. Repetitive burning reduces overall visual diversity. It often results in loss of valued mid- and understory species such as flowering dogwood, but tends to promote herbaceous flowering species. Prescribed fire repeated over time produces stands with open understories allowing views farther into the landscape.

**Table C5.4 Planned Prescribed Burning Program by Alternative, acres per year**

	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
Prescribed Burns, acres per year	3,000	12,000 - 20,000		5,000 - 12,000	20,000	12,000 - 20,000	12,000-20,000

Alternative E has the most acres in the prescribed burning program, and therefore the greatest potential for altered scenery, while Alternative C has the least.

Alternatives B, E, F and G, assign acres to prescription area 13, Mosaics of Wildlife Habitat. As stated above, this prescription emphasizes, among other projects, restoring open woodlands that once existed as part of the natural evolving landscape. This would be achieved primarily through an expanded program of controlled burns to restore the historic role of wildland fires in the ecosystem. The openings created by these fires benefitted many species of wildlife, grass forbs, and understory and mid-story species, including many flowering shrubs and edge-loving trees. These openings and the diversity of vegetative and wildlife species found in them influenced the landscape character.

Prescribed fires planned in Alternatives B, D, E, and G would be larger and hotter than prescribed fires conducted under the current Forest Plan. These fires, several thousand acres in size, would result in blackened and charred trees, including large patches of dead trees that could be visible for several years. However, within a year, vegetation will grow in these natural appearing openings and with time would dominate the characteristic landscape. These openings are anticipated to provide added diversity to both the visual and biologic resources.

Project analysis would take into account the desired condition of a landscape character theme that contains these openings that appear to mimic natural wildfires. In scenic class 1 areas with a High SIO, any elements that visually appear to be human caused, such as roads, and that would be deemed not to meet that High SIO, would be avoided by implementing mitigation measures.

Insect infections and diseases can cause strong, unattractive contrasts in the landscape. Management efforts to control insect infestations and diseases can minimize or reduce effects. However some control efforts, such as removal of infected trees, may appear to visitors to be similar to clearcutting; but this can be avoided by implementing mitigation measures. Forest Service managers have the least flexibility to treat or control insects and disease infestations in Alternative C if recommended Wildernesses are designated by Congress as Wilderness. Alternatives D, E, F and G provide the least potential affects to scenery due to insect and disease

outbreaks. Under these alternatives, non-native and invasive species (NNIS) are treated aggressively, prevention and control in disturbed and/or high use areas is emphasized, Integrated Pest Management (IPM) techniques are used, and a priority is placed on preventing spread to adjacent private lands. Alternatives A and B have less potential impacts than Alternative C but more than Alternatives D, E, F and G. Alternative A focuses primarily on controlling gypsy moth and Alternative B increases recognition of non-native and invasive species. Both A and B make use of IPM techniques.

Utility rights-of-way (ROW) have a high potential of affecting the scenic resource for a long duration. Cleared ROWs, utility structures contrast and may be incongruent with existing landscape. Cleared ROWs provide contrast in form, line, color, and texture when compared to the natural appearing landscape.

Industrial wind development can have significant impacts on the scenic resource. Wind turbines hundreds of feet in length are erected on large concrete pads on ridgetops, visually breaking into the skyline when viewed from any angle except perhaps from an airplane. Roads are needed to access each wind turbine site, altering the form, line, color and texture of the natural landscape. Alternatives C and E would provide the most protection to the scenic resources, as they do not allow for any wind development. Alternative D has the potential for the most impacts to scenery, as it makes the entire Forest available for proposals for wind development. Alternatives B, F and G restrict wind development in the most visually, socially and environmentally sensitive areas, but do not protect all areas from the potential impacts of wind development on scenery. Alternative A is silent on wind development.

Mineral management and development activities can involve a range of alterations from small surface structures along existing roads to major landform alteration, as well as form, line, color, and texture contrasts, causing substantially adverse scenic impacts. Alternative C has the least potential for negative impacts due to oil and gas leasing, as it does not allow any acres for this use. Alternative A has the potential for the most impacts due to oil and gas leasing, making 960,000 acres (90% of the Forest) available for standard or controlled surface occupancy. It contains no direction related to the development of Marcellus shale. Alternative D makes available 720,000 acres and Alternative B makes available 700,000 acres for leasing under standard or controlled surface occupancy stipulations. Both allow for the development of Marcellus shale, but specific standards would be used related to hydrofracking.

Road maintenance, especially rights-of-way maintenance, affects scenery. Mowing frequency and timing alters the appearance of the landscape. Road construction introduces unnatural visual elements into the landscape and causes form, line, color, and texture contrasts. Road management controls how much of the landscape is seen by having roads open or closed.

**Table C5.5 Miles of Road Construction per Year by Alternative**

	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
Road Construction, miles per year	2.9	1.5	0	4.1	0.9	0.5	1.5

Related to roads, Alternatives C and F would have the least impacts to the scenic resource while Alternatives A and D would have the greatest potential for impacting scenery. Additionally, Alternative C would decommission 28 miles of road per year in the first decade of the Revised Forest Plan and Alternative F would decommission 18 miles. Alternative A does not provide for decommissioning of roads.

Vegetation management has the great potential to alter the landscape and impact the scenic resource. Timber harvest practices can cause long-term effects on scenery by altering landscape character through species conversion, reduction in species diversity, manipulation of the prominent age class, and alteration of opening sizes, locations, and frequencies. The potential effects may be positive or negative, depending on their consistency with the desired future condition of the landscape.

**Table C5.6 Estimated Harvest Acres and Allowable Sale Quantity  
for Timber Management Activities by Alternative, First Decade**

	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G
Acres of Regeneration Harvest, in thousands, first decade	30	30	0	42.5	18	10	30
Allowable Sale Quantity, in million cubic feet, first decade	47	54.3	0	101	31.1	20.4	54.3

Related to timber production, Alternative C would have the least adverse affect on the scenic resource and Alternative D would have the greatest potential for adverse affects to scenery. Of the alternatives that provide for an active timber program, Alternative F would have the least affect on the scenic resources of the Forest.

Of the management applications, even-aged management may be the most impacting. Among the even-aged regeneration methods, clearcutting and seed-tree harvest produces the highest visual contrasts because they remove the most forest canopy and create openings with visible roads and/or skid trails. These openings would vary in their effects on scenery depending on location, size, shape and distance from viewing platforms. Openings that repeat the size and general character of surrounding natural openings, with the least contrast in line, texture and shape, would impact scenery the least.

Single-tree selection and group selection harvest are normally less evident because they do not cause large openings in the canopy. Uneven-aged regeneration methods can affect scenery, causing contrasts in form, line, color, and texture from slash production. All impacts as a result of timber harvest are short-term because of rapid vegetation growth.

Site preparation activities affect scenery by exposing soil and killing other vegetation. These effects are generally short-term. Site preparation usually improves the appearance of the harvest area by removing the unmerchantable trees and most of the broken stems. Stand improvement work can affect scenery by browning the vegetation, reducing visual variety through elimination of target species. Table C5.6 provides the allowable sale quantity (ASQ) and annual harvest program by alternative.

Recreation facilities are deviations to the natural landscape. None of the alternatives provide for the development of new developed recreation sites. Alternatives B, F and G provide for expanding the capacity of some existing recreation sites. Forest Service recreation facilities are designed to blend into the landscape without major visual disruption. Alternatives C and E would result in closing and decommissioning some recreation areas. All man-made elements would be removed and the site put back to grade. Vegetation would eventually grow in and the casual observer would not be able to tell that a developed area had once existed there.

Designation of wilderness will generally cause positive effects to the scenery. Barring serious infestations by insects or disease, old-growth forest character will be created over time. What it lacks in visual variety, it makes up for with an intact, natural appearing landscape. Alternative C provides for the most recommended Wilderness at about 22% of the George Washington land base. Alternative F is next highest for recommended Wilderness acres, at about 9% of the Forest. Alternatives A, B and G provide for the least acres being allocated to recommended Wilderness study areas.

## **ERRATA FOR THE DRAFT FOREST PLAN**

**Forest Plan Chapter 3, Page 3-23, Change to:**

### **Objectives for Timber Management**

**OBJ TIM-1:** A total timber sale program quantity (TSPQ) of 3.8 to 5.4 million cubic feet (MMCF) [19 to 27 million board feet (MMBF)] is provided annually from lands suitable for timber production. This equates to about 1,800 to 3,000 acres per year **of regeneration harvest plus about 400 acres per year of thinning**. The maximum Allowable Sale Quantity (ASQ) for the first decade is 54.3 MMCF.

**Forest Plan Chapter 4, Page 4-18,**

Forestwide Standards FW-161 should be deleted. We are using the inventoried ROS classes in the Forest Plan, not adopted ROS classes as in the 1993 Plan.

Delete:

**FW-161:** New structures and facilities are constructed and maintained to meet the adopted ROS class for the area.

**FW-162:** Recreation opportunity maps will govern all new projects, including special uses. Existing conditions may not meet the assigned ROS classes.

And replace with

**FW-161\*:** New projects (including structures, facilities, and special uses) will be evaluated based on their potential to change the inventoried ROS class of the area.

## **ERRATA FOR THE SUMMARY FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DRAFT REVISED LAND AND RESOURCE MANAGEMENT PLAN**

On page S-21 of the Summary of the Draft EIS and Draft Plan document, the first sentence of the second paragraph under the Timber Harvest heading should read: ‘The Plan objective is to slightly increase the annual Allowable Sale Quantity (ASQ) from 4.7 to 5.4 million cubic feet (MMCF) [27 million board feet (MMBF)].’

1. **(May 21)** I'm trying to understand the dimensions of the timber program in each of the alternatives, especially as shown on table 2-17 on page 2-36 of the draft EIS. Can you help me by clarifying the following:

1. Karen said the ASQ for alternative A, which we had assumed for years was 330 MMBF for the decade, was adjusted to 235 MMBF due to a change in the official conversion ratio between cubic feet and board feet. I noticed at least one place where the ASQ for alternative A was still described as 33 MMBF per year. Is there some way to make certain that all the conversions are done (and made clear to the public what has been done) so there is no confusion about the volume associated with this alternative?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

2. Are ASQ figures for all the alternatives correct? Assuming that the ASQ as expressed in terms of cubic feet (rather than board feet) is correctly expressed in table 2-17 for all the alternatives, am I correct that the preferred alternative (alternative G) has an ASQ that is approximately 15% higher than the current plan (alternative A)?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

3. Are the acres suitable for timbering correct for all the alternatives in this table? Am I correct that the suitable base in the preferred alternative is approximately 25% higher than in the alternative modeling the current plan?

*Karen Responded on 6/6/11. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

Follow-up to 3 on 6/6/11. You did not directly answer my question #3 whether or not the suitable base figures used for alternatives displayed in the table were accurate. The errata sheet shows a suitable base for the preferred alternative of 439,000 acres. The FAQs uses a figure of 450,000. In other places in the documents, a variety of figures appear. Which of these figures is correct? I haven't gone through to check all the alternatives to see what variation may exist in various places in the documents, but I would not be surprised to find substantial variation in the suitable base figures for each alternative. Until there is a systematic examination of the documents and systematic correction to a single number to express the suitable base acreage for each alternative, I don't know how the public is supposed to know what the Forest Service is proposing, or how we can be expected to make substantive comments about the proposed action or the alternatives.

*Response: In the Summary document, page S-21 under Timber Harvest, the suitable acres should be 439,000 acres (not 440,000). In the FAQs document, page 1, the change in suitable acres should be to 439,000 acres (not 450,000). In the Draft Plan, pages 3-30 and page C-2, Total Suitable Land*

*should be 439,000 acres (not 438,000) and Economically Inefficient Land should be 114,000 acres (not 115,000.) Changes will be identified to the public in the Errata.*

4. The table shows that in alternative A the number of acres harvested to produce the ASQ of 47 MMCF is 30,000 acres over the first decade. The table also shows that for alternative G, the number of acres harvested to produce the ASQ of 54.3 MMCF is 18,000 acres. Since the ASQ for alternative G is approximately 15% higher than alternative A, I would expect that the number of acres needed to produce this higher volume would rise approximately 15% rather than fall by 40%. This table shows that alternative E also has 18,000 acres harvested, but it is associated with an ASQ of 31.1 MMCF. This is more what I would expect as the relationship between ASQ and acres harvested. Could you clarify? Is there an error in the figures? If not, are they based on Spectrum runs?

*Karen Responded on 6/6/11; included in Errata. In answer to questions #1, #2 and #3, we did make some errors and have prepared an errata document to correct some errors in the DEIS and posted it on the website. In response to #3, the suitable base acres are higher than the preferred and the rationale is addressed in the FAQs document that is on the website. Here's the errata document and the FAQ document.*

2. **(May 28)** I called Ginny Williams last week with questions about the allocation of SIOs in the draft GWNF plan, and I have some additional questions about the management of scenery.

As I noted in my discussion with Ginny, the 1993 GWNF Plan (p.2-24, Table 2-5) allocates adopted VQOs as follows:

Preservation	46,000
Retention	379,000
Partial Retention	548,000
Modification	88,000

The current draft for the revised GWNF EIS for the Forest Plan includes a crosswalk between Visual Quality Objectives and Scenic Integrity Objectives in Table C5.1 on page 3-251 of the draft EIS.

I would expect that Alternative A, which models the current GW Plan as the No Action Alternative, would show the following SIOs:

Very High	46,000
High	379,000
Moderate	548,000
Low	88,000

However, in the current draft Plan for the GWNF, the allocation of SIOs for Alternative A, the 1993 GWNF Plan, is far different. See table C5.3 on page 252 of the draft EIS the acres (rounded) are as follows:

Very High	46,000
High	350,000
Moderate	203,000
Low	467,000

What accounts for the differences in portraying the allocation of VQOs/SIOs in the 1993 GWNF Plan?

I noticed that in table C5.3, the alternatives have varying acreage in the four SIO classes. On what basis are SIOs allocated in these alternatives to account for the varying figures?

*Response: The SIOs are determined from a combination of the Scenic Class and the Management Area Prescription as indicated in the standards for each Mgmt Area Rx. Therefore, the SIOs do vary between the alternatives, according to the alternative's Mgmt Area Rx allocations. Alternative A represents the current Forest Plan, but it was described in terms of the 2011 Management Prescription Areas rather than the 1993 Management Areas to facilitate comparison of alternatives. In regard to Scenic Integrity Objectives, the Management Prescription Areas differ from the 1993 Management Areas. In the DEIS we incorrectly used the 2011 Management Prescription Areas to describe the Scenic Integrity Objectives for Alternative A. We have identified these errors in the Errata.*

**3. (May 28)** In the 1993 Plan the allocation of ROS by acreage was:

SPNM	150,000
SPM	206,000
Roaded Natural	615,000
Roaded Modified	86,000

I could not find a table that compared the distribution of ROS classes among the various alternatives in the draft EIS. If there is a table that I missed, on what page is it located?

If this information is not included in the draft EIS, what is the distribution of ROS acreage that you used in your analyses?

In the 1993 Plan/EIS, there was a map of the ROS areas. Is there a similar map available for the draft alternatives?

The draft Plan gives a range of acreage in ROS classes. Why is there a range instead of a fixed number? Is there a visual display showing the areas that would be included/excluded in the upper or lower range of allocation?

*Response: The 1993 Forest Plan assigned, or "adopted" ROS classes for specific areas of the Forest. These were assigned differently in different alternatives. Unlike the 1993 Plan, the proposed Plan does not use adopted ROS classes so there is no variation between the alternatives. The ROS inventory acres are displayed in the first column of Table C1.10. There is an ROS map under the Maps category on the Key Documents section of the revision website. The range of acres by ROS class is displayed to acknowledge that areas currently inventoried as Semi-Primitive Motorized or Semi-Primitive Non-Motorized that are in Management Prescription Areas that allow road construction, could be potentially changed to Roaded Natural settings. This would occur after site specific analysis, so cannot be mapped. However, the only place this would occur is in Management Prescription Areas that allow road construction.*

**4. (May 28)** As you may recall from my presentations in the IDT meetings, I am interested in the budgets needed to implement the plan or alternatives.

I did not see any figures in the draft Plan or EIS about the budgets that would be needed to implement the various management activities. If there was such a discussion that I overlooked, could you give me the page(s) in the draft documents? If you did not include these in the draft EIS or Plan,

did you calculate these when you were doing analysis of the various alternatives, and could you send the figures?

I also did not see any display of the budgets associated with management of the GWNF over the life of the current (1993) Plan. Are these figures available? If so, would you please send them?

*Response: Historical budgets since 1993 are included in Appendix E – Budgets and Accomplishment History in the Analysis of the Management Situation. The estimated program budgets for each alternative were used in the Present Net Value determinations discussed in Chapter 3 of the DEIS and in the economic input/output IMPLAN model estimates for contributions to jobs and income in the local economy. The program costs for Alt A were re-estimated based on administrative process records we found for the preferred alternative and overhead costs were included in each program area for all alts. The PNV calculations for each alternative were re-run and are included in the Errata.*

<b>Program Costs (M\$'s, average cost for decade)</b>							
	<b>Alt A</b>	<b>Alt B</b>	<b>Alt C</b>	<b>Alt D</b>	<b>Alt E</b>	<b>Alt F</b>	<b>Alt G</b>
<b>Timber</b>	2,081	2,465	0	4,167	1,438	931	2,480
<b>Roads/Engineering</b>	3,101	2,099	1,965	2,207	2,101	2,053	2,112
<b>Recreation</b>	7,205	5,157	5,232	4,674	4,131	4,769	4,416
<b>Wildlife</b>	1,931	726	460	793	738	741	731
<b>Soil, Water &amp; Air</b>	1,628	1,503	853	1,492	1,559	1,533	1,544
<b>Fire</b>	1,343	2,230	1,461	1,729	2,531	2,274	2,244
<b>Lands</b>	1,701	488	515	484	496	497	491
<b>Range</b>	11	11	12	11	12	12	11
<b>Minerals</b>	210	238	229	258	220	243	218
<b>Planning, Inv., Monitoring</b>	443	456	482	453	568	465	459
<b>Total</b>	19,654	15,373	11,209	16,268	13,794	13,518	14,706

5. **(May 28)** You mentioned in the draft EIS that changes were made in the conversion ratio between cubic feet and board feet, so the 33 MMBF volume given for the 1993 GWNF Plan was adjusted downward. (Please note that you still list the volume for the 93 Plan as 33 MMBF at least once.)

What is the "old" conversion factor that was used in the 93 Plan and what is the current conversion factor?

Has that changed more than once since 1993?

How have figures used to report volume cut since 1993 (usually given in MMBF) been adjusted over time?

*Karen Responded on 6/6/11; The old conversion factor used in the 1993 GW Plan was 6.98 to go from MMCF to MMBF. At one point, it was 5.5 and now it is 5.0. As you can see in the Errata for the DEIS document, we did find that we were not consistent in using the same conversion factor in reporting volume sold over the years. However, Russ did look over the spreadsheet he has been*

keeping that reports volume cut since 1993 and there is a footnote on that one (started by Jim Sitton) where Jim was using the same conversion factor of 5.0 throughout the years. So Russ feels confident that the volume cut that he has given you in the past did adjust the volumes to a common conversion.

6. **(May 28)** I was reading your write up in the draft Plan and EIS about roads, and I can't make out what you have in mind for road management. I guess I'm an old fashioned guy who needs a table for the number of miles of open, seasonally open, and closed miles of road for each alternative. I didn't see such a table, but maybe you can point one out, or send me the figures.

*Response: Currently about 230 miles are closed, 642 are for administrative use, 367 are open seasonally and about 574 are open. Tables comparing these categories for each alternative were not prepared for the DEIS.*

7. **(May 29)** I've looked for the rotation ages for the various forest types, but I didn't see it in the documents.

What rotation ages were used in the Spectrum runs?

Are these rotation ages the same as the CMAI?

*Response: Since the preferred alternative uses mgmt Rx 13 instead of the individual wildlife habitat and timber production Mgmt Rxs as in the 1993 Plan and the JNF Plan, we have forest-wide rotation ages that apply, as shown in standard FW-112, page 4-13 of the Draft Plan. The emphasis became the ecological system, not the Mgmt Rx in terms of the rotation age. The Northern Hardwoods ecological system would fit under the Cove Hardwoods in the rotation age table and the Spruce Fir ecological system would fit under the White Pines. The CMAI ages are found at the following standard FW-113, with the change of Mixed Hardwoods in the standard to Cove Hardwoods (identified in the Errata).*

*For the alternatives that kept the individual wildlife habitat and timber production Mgmt Rxs (Alts A and D), the Spectrum rotation ages varied. For example, Mgmt Rx 8C (1993 MA 14) had longer rotations ages. For the alternatives that used Mgmt Rx 13 (Alts B, E, F, G), the rotation ages used for Mgmt Rx 13 in Spectrum were as listed in the FW-112 table 4.2 in the Plan. The following table of rotation ages used for each alternative in Spectrum will be added to Appendix B of the Final EIS.*

**Rotation Ages for Mgmt Rxs Suitable for Timber Production by Alternative**

Rx Code	Rx Description	Alt A	Alt B	Alt D
7A1	Scenic Byway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
7B	Scenic Corridors and Viewsheds	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
7C	ATV Use Area	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90

7E	Dispersed Recreation Areas			
7E2	Dispersed Recreation Areas-Suitable for Timber Production	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
7F	Blue Ridge Parkway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100
8A1	Mix of Successional Habitats	CVH, UPH 100-120 WPN, SYP, SO 80-100		CVH, UPH 100-120 WPN, SYP, SO 80-100
8B	Early Successional Habitats	CVH, UPH 80-100 WPN, SYP, SO 80-100		CVH, UPH 80-100 WPN, SYP, SO 80-100
8C	Black Bear/Remote Habitats	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100		CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
8E4b	Indiana Bat-Secondary Conservation Area	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100
10B	Timber Production	CVH 70-90 UPH 80-100 WPN, SYP, SO 60-80		CVH 70-90 UPH 80-100 WPN, SYP, SO 60-80
13	Mosaics of Habitat-Suitable for Timber Production	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	
7A1	Scenic Byway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7B	Scenic Corridors and Viewsheds	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7C	ATV Use Area	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-90 UPH 80-100 WPN 60-80 SYP, SO 70-90	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7E	Dispersed Recreation Areas		CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
7E2	Dispersed Recreation Areas-Suitable for Timber Production	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100		
7F	Blue Ridge Parkway	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH, UPH 120-180 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
8A1	Mix of Successional Habitats			
8B	Early Successional Habitats			

8C	Black Bear/Remote Habitats			
8E4b	Indiana Bat-Secondary Conservation Area	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 100-120 UPH 120-140 WPN, SYP, SO 80-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100
10B	Timber Production			
13	Mosaics of Habitat-Suitable for Timber Production	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100	CVH 70-180 UPH 80-180 WPN, SYP, SO 60-100

UPH = Upland Hardwoods  
CVH = Cove Hardwoods

SYP = Southern Yellow Pines  
WP = White Pines SO = Scarlet Oak

8. (June 5) Is your link to the EIS of the 1993 GWNF Plan broken? The 93 EIS won't open for me.

*Response: We checked the link and found it to be working.*

9. (June 7) I got an email from someone stating that the proposed plan shows a decline in ASQ from the 93 plan. I followed up to see where this notion had come from, and there it is in the Summary, page S-21. "The Plan objective is to slightly reduce the annual Allowable Sale Quantity (ASQ) from 6.6 to 5.4 million cubic feet (MMCF) [27 million board feet (MMBF)]." That seems at odds with other statements about the volume (in cubic feet) for the current plan. What are the correct figures?

Table 2-17 in the errata sheet needs to be corrected further.

Table 2-17. Comparison of the Timber Harvest Issue by Alternative

	Alternative						
	A	B	C	D	E	F	G
<b>Age Class Distribution in 2040</b>	Percent of Forested Acres						
0-10 (1% in 2010)	3	3	0	5	2	1	2
11-40 (9% in 2010)	7	7	1	10	5	3	5
41-80 (7% in 2010)	10	10	10	8	10	10	10
81-100 (36% in 2010)	1	1	1	1	1	1	1
101-130 (33% in 2010)	34	34	40	34	35	38	35
131-150 (8% in 2010)	25	25	27	24	26	26	26
150+ (6% in 2010)	20	20	21	18	21	21	21

The percent in forested acres for the preferred alternative (G) was based on a harvest rate of 1800 acres per year. You corrected the harvest rate to 3,000 acres per year for the preferred alternative, but you need to change the age class distribution to match alternative B, which has the same harvesting program as alternative G. You also need to go through the documents to correct any other tables/figures that have the incorrect age class distribution figures for the preferred alternative.

*Response: Regarding the statement made on page S-21 of the Summary document, we cannot determine where the 6.6 MMCF came from but it is in error and will be corrected in the Errata. It should actually read that the Plan objective is to slightly increase the annual ASQ from 4.7 MMCF in the 1993 Plan to 5.4 MMCF.*

- 10. (June 9)** Referring to Table 2-2. Land Allocation of Management Prescriptions by Alternative, on pages. 2-18 and 2-19 in the draft EIS:

I don't understand why the acres allocated to some prescriptions vary among the alternatives. Why is the acreage allocated to Wilderness (prescription 1A) not the same for all alternatives? The designated Wilderness hasn't changed, has it? Why is the acreage allocated to Research Natural Area not the same for all alternatives? Why is the acreage allocated to Mt. Pleasant National Scenic Area not the same for all alternatives? Why is the acreage allocated to the Blue Ridge Parkway not the same for all alternatives? Why is the acreage allocated to the Appalachian Trail Corridor not the same for all alternatives? Why is the acreage allocated to the Indiana Bat Secondary Habitat not the same for all alternative? Etc.

*Response: The difference between alternatives in acreage for Management Prescription Area 1A(Wilderness) is less than 60 acres, the difference for Research Natural Areas is 1 acre, the difference for Mt. Pleasant is less than 9 acres. For these areas the differences are inconsequential and due to minor errors in mapping the alternative in the Geographic Information System (GIS). The actual boundaries of these areas do not change by alternative. For the other areas, the acreage will change due to a hierarchy of mapping; always a difficulty in double-counting/under-counting Rx areas versus resource inventory areas. For instance, the Appalachian Trail corridor will not be displayed, nor will its acreage be included in the total acreage of Management Prescription Area 4a if it is located within a recommended wilderness area. The hierarchy of mapping is explained on page 3-1 of the Plan for Table 3.1 but should have also been noted on page 2-18 of the DEIS for Table 2-2 and page S-11 of the Summary for Table 1. Since the recommended wilderness areas vary by alternative, the acreage of other areas will vary as well. The acres listed for each Management Prescription Area description in Chapter 4 of the Plan identifies the actual acres, regardless of the mapping hierarchy used in the alternative maps.*

- 11. (June 11)** In Table C6.13 Acres by Method of Harvest for the First 10 Years for all Harvest Methods on page 3-266 of the draft EIS, the number of acres cut over the decade in the preferred alternative (G) totals 34,000, which would equate to 3400 acres per year. Why is this number different from the 3000 acres of harvesting per year that is used in several other places in the draft plan and draft EIS to express the number of acres cut to produce the ASQ? Which number should be the authoritative number? The number of acres cut in the "no action" alternative (A), is 32,670, or 3267 per year, while the number in other places in the draft EIS to express the number of acres cut to produce the ASQ is 3,000 Which number should be the authoritative number for the "no action" alternative?

*Response: Table C6.13 displays the correct level of acres expected to be harvested. In several areas of the Draft EIS and Draft Plan the harvest level should have been labeled as the regeneration harvest level. These references did not include the acres to be thinned. We have identified these errors in the Errata.*

- 12. (June 12)** Please help make sense out of Table 2-5. Projected Habitat Components at 10 Years by Alternative, on page 2-22 of the draft EIS. How can Alternative A, the no action alternative, have 4% in early successional habitat after 10 years while alternative G, the preferred alternative, has 2-3% in early successional habitat after 10 years, even though alternative G has more timber harvested than alternative A?

*Response: Table 2.5 was based on information from Table B2.11 on page 3-108. Tables B2.11 and B2.12 have been updated in the Errata to properly reflect the natural disturbance and active management activities that provide early successional habit and open woodlands. The Errata also corrects an error in the harvest level for Alternative F. In adjusting for these factors, Table 2.5 has also been updated.*

- 13. (June 15)** I am looking at Table 2. *Summary of Effects of Alternatives*, on page S-14 of the Summary. The table shows that the "open woodland" habitat after 10 years for alternatives B, E, F, and G is 11%. Am I correct that this habitat is the result of prescribed burning? This same table shows that the prescribed burning levels for alternatives B, F, and G are in the range of 12,000 to 20,000 acres per year, and the level for alternative E is 20,000 acres. Since the effects are the same for B, E, F, and G, am I correct in my conclusion that the level of burning that is being described in the 11% figure is 20,000 acres? Is there any effort to show the effects for alternatives B, F, and G if the rate of burning is somewhere between 12,000 acres and 20,000 acres?

*Response: You are correct that this is the result of prescribed burning. Unless otherwise noted in the analysis, the higher number in the range is what was analyzed in the EIS. The effects of the lower end of the range (12,000) is reflected in the figures for Alternative D that had a range of 5,000 to 12,000 acres.*

- 14. (June 17)** While discussing the draft plan with the Washington Office, we discussed the SIOs for the various alternatives. I couldn't answer key questions because I didn't have any maps for alternatives. Are there maps that show SIOs by alternatives? If there are, are they displayed somewhere on the website? If not, could you send them to me electronically or put them up?

*Response: We do not have maps that show SIO's by alternative. A map of the SIO's associated with the Draft Plan (Alternative G) is posted in the Key Documents on the website. If we generate maps of SIO's by alternative we will post copies on the website.*

- 15. (June 19)** I'm having trouble making sense of the transportation (roads) planning in the draft documents. Perhaps you can help explain what you've done.

1. In the draft EIS discussion about roads in chapter 3, pages 3-272 and 3-273, there is no discussion of cost or environmental effects (esp. sediment) included for the various alternatives. Are these effects discussed elsewhere in the EIS?

*Response: Effects to and from roads are discussed in Chapter 3 in the sections on Geology, Climate, Soils, Air, Water, Terrestrial Species, Aquatic Species, Fire, Recreation, Cultural Resources, Wilderness/Roadless, Scenery, Minerals, and Social/Economic Resources. Costs are discussed in Question #4.*

2. There is reference to Travel Analysis Process (TAP), which appears to be the analysis "driving" the development of the minimum road system needed for each alternative. There is no explanation in the draft EIS for the methodology used to develop the road mileage for the different alternatives. If the alternative road mileage is derived from TAP analysis, why is there no link to TAP analysis or an appendix outlining this analysis?

*Response: The TAP Report and TAP data does appear as a link on the Forest Plan Revision website.*

3. In Table C 8.3, which displays the maintenance level of the roads, the "No Action" alternative (A), has a higher total road maintenance mileage (1852 miles) than the total miles of roads in the current system (1823 miles). How can that be?

*Response: The table was corrected in the Errata.*

4. In the 1993 GWNF Plan, the total mileage of Forest Highways in Virginia and West Virginia was 797 miles. The draft EIS says that the current mileage of Forest Highways in Virginia and West Virginia is 804 miles. If only 7 miles of road maintenance was transferred from the responsibility of the GW to the two states over the last 18 years, what reason is there to assume that 107 miles will be transferred to maintenance by the States over the life of this plan, especially in light of the budget squeeze on state transportation budgets for the foreseeable future?

*Response: The DEIS states on page 3-272 " It is anticipated that at least a portion of the 107 miles of road will be upgraded and converted to a Forest Highway within the current Plan period." The Forest will work towards this goal.*

5. Table C 8.3 shows that the "No Action" alternative (A) includes 8 miles of roads maintained at level 5, whereas all other alternatives include only 5 miles of roads at level 5; the "No Action" alternative includes 97 miles of roads at level 4, whereas all other alternatives include 33 miles at this maintenance level; the "No Action" alternative includes 465 miles of maintenance level 3 roads, whereas the other alternatives have mileage that range from 297 to 313 miles. Since Table C 8.1 shows that in all alternatives, including the "No Action" alternative, the minimum road system does not include 50 miles of Special Uses or 107 miles of Forest Highways, what accounts for the large disparity between the "No Action" alternative and all other alternatives?

*Response: Table C 8.3 incorrectly included the Special Use road mileage and the Forest Highway mileage. The table is corrected in the Errata. The remaining disparity is due to the lack of decommissioning in Alternative A.*

16. **(June 19)** In reviewing Table C1.14 Estimated Total Acres of Big & Small Game Emphasis Areas by Alternative (in thousands), alternative G shows 507 (thousand) acres in the suitable base. This is far more than the 439,000 (or 440,000 or 450,000) shown elsewhere in the documents. Alternative A, the "No Action" alternative, shows 371.3 (thousand) acres as suitable, which is more than the 360,000 acres in the 93 Plan's suitable base. Are these figures in error, or is there some other explanation?

*Response: This table is in error regarding suitable acres. The amount of acres suitable for timber production is not needed in this table. It is corrected in the Errata.*

17. **(June 19)** The draft Plan contains the following statements:

***OBJ REC-7: Maintain a total of at least 244 miles of open or seasonally open roads as high clearance roads to meet Off-Highway Vehicle user needs.***

***The mileage of roads maintained for high clearance vehicles (OHV) is estimated to be about 1,030 miles across the Forest, near current levels.***

***OBJ RDS-3: Maintain to standard a minimum of 75 miles of passenger car roads (OML 3-5) and a minimum of 105 miles of high clearance vehicle (OML 1-2) roads on an annual basis.***

Could you please clarify how many miles of roads are maintained suitable for high clearance vehicle use?

*Response: It is estimated that about 1,030 miles of road will be maintained at maintenance level 2 which is designed for high clearance vehicles. There is an objective to assure that at least 244 miles of these high clearance roads will be open, at least seasonally to meet the needs of OHV users. The third item refers to annual road maintenance activities as opposed to a total number of roads available for use at a specified maintenance level. The word 'maintain' with these three statements will be changed in the Final Plan to distinguish between road maintenance and the desire to keep something at a minimum level.*

- 18. (June 21)** In analyzing developed recreation capacity, the draft EIS uses the measure of "Person at One Time" (PAOT). In Table C1.11 *Estimated Capacity (PAOTs) of Developed Recreation Areas by Alternative* on page 3-210, it is claimed that the "No Action" alternative (A) has a PAOT of 10,210. However, the 1993 GWNF Plan, which is supposed to be represented in alternative A, actually shows a PAOT of 16,200. See page 2-85 of the 1993 GWNF EIS. Do you agree that a correction needs to be made in the draft documents to reflect the correct figures for alternative A? According to the 1993 EIS, the capacity **existing** in 1993 was 13,820 PAOT. See page 3-7 of the 1993 GWNF EIS. The PAOT capacity of 16,200 in the 1993 Plan was the result of substantial construction of new facilities. In the preferred alternative for the new GWNF plan, the Forest Service is proposing a substantial reduction in developed recreation capacity. The POAT capacity in the preferred alternative (G) is only 10,720. See page 3-210 in the draft EIS. However, there is no explanation or analysis of this substantial reduction from capacity that existed in 1993. Do you agree that the Forest Service is proposing a substantial reduction in developed recreation capacity? Do you agree that the planning documents should include an analysis of where these reductions are taking place and the rationale for the reductions?

*Response: Table C1.11 is corrected in the Errata. The current capacity of about 10,225 PAOT displayed in the Errata differs from the existing capacity displayed in the 1993 Plan (about 13,000 PAOT). This difference is due to: 1) the 1993 figures include PAOT (2,608 PAOT) that are now displayed in the DEIS in Table C1.7 as Developed Access Points for Dispersed Recreation; 2) PAOT were calculated differently for some sites in 1993 and have been updated in our current database; and 3) a few sites have been decommissioned. Rather than proposing a substantial reduction in capacity, Alternative G reflects the current status, but without the planned additional construction in Alternative A.*

- 19. (June 21)** Could you help me understand how ROS settings are guiding the planning of dispersed recreation in the draft GWNF plan/EIS? Alternative A, the "No Action" alternative, has a specific number of acres in six ROS classes, as described in Table 2-11, on page 2-40 of the 1993 Plan,

<u>ROS Class (Thousands of Acres)</u>	
Rural	2
Roaded Modified	86
Roaded Natural	613
Semi-primitive Motorized- 1	104
Semi-primitive Motorized-2	104
Semi-Primitive Non-Motorized	150

There is also a map in the planning records for the 1993 GW Plan that shows where these acres are to be allocated on the ground. There are also maps for the 2004 JNF Plan that show where the ROS class acres are allocated on the ground.

However, I did not see any maps that show where the ROS classes are allocated on the ground for alternatives B through G in the current revision documents. Did you prepare such maps? If not, how is the public to evaluate the adequacy of the various alternatives in making ROS allocations expressed in Objectives? (It would be particularly helpful to have ROS maps that also show roads that are candidates for decommissioning so the public could evaluate the relationship of decommissioning and proposed SPNM areas.)

FYI, I attempted to open the map of the GWNF existing ROS inventory (February 2010) that is listed in key documents section on the web site. The link appears to be broken, and it would not open.

*Response: ROS classes were not allocated on the ground in Alternatives B through G. The ROS inventory was used to allocate other management prescriptions, some of the prescriptions have direction that will assure that the inventoried ROS class remains and others allow activities that could alter the ROS from the current inventory.*

- 20. (June 21)** In reviewing Table C12.19 *Cumulative Decadal Present Net Values of Benefits and Costs (millions of dollars, 4% discount rate cumulative to midpoint of 5th decade)*, on page 3-297 of the draft EIS, it struck me that all the present value costs by program and all the present value benefits by programs are expressed as a single value for each of the programs for each of the alternatives. However, the many of the objectives for the alternatives show a numerical range of activities. For example, the preferred alternative says that timber harvesting may range between 1800 acres and 3000 acres per year and that the prescribed burning program may range between 12,000 acres and 20,000 acres per year. It seems only reasonable to expect that the costs and the values from these activities would vary greatly depending on what level actually takes place, and therefore the PNV calculations would show a range of costs or benefits for each program instead of a single value. Could you explain or provide a process paper on how you arrive at a single number expressing the costs and the benefits over a five decade period when there may be a wide range of program activities on a yearly basis?

*Response: The benefits and costs associated with the timber outputs were calculated using the Spectrum estimates, which are based on the level of acres harvested shown in Table 2-17, with the corrected typos identified through the Errata. The costs associated with the fire program reflect the upper end of the range for each alternative, as clarified in the Errata.*

- 21. (June 23)** When is the next IDT meeting open to the public?

*Response: Replied in e-mail 6/28/11 that there will be no IDT meetings until after the 90 day comment period ends on October 1, 2011 and nothing has been scheduled yet.*

- 22. (July 5)** Your first objective for timber (on page 3-23 of the draft Plan) states:

*OBJ TIM-1: A total timber sale program quantity (TSPQ) of 3.8 to 5.4 million cubic feet (MMCF) [19 to 27 million board feet (MMBF)] is provided annually from lands suitable for timber production. This equates to about 1,800 to 3,000 acres per year. The maximum Allowable Sale Quantity (ASQ) for the first decade is 54.3 MMCF.*

In Appendix C of the draft Plan, Table C-3, on page C-4, shows:

Total Allowable Sale Quantity	54.3 MMCF
Total Non-Scheduled Volume	0 MMCF
Total Timber Sale Program Quantity	54.3 MMCF

Since there is no amount shown for non-scheduled volume, the allowable timber sale quantity (ASQ) is equal to the timber sale program quantity (TSPQ). Is it therefore correct that the variable timber sale quantity program in OBJ TIM 1 of 3.8 to 5.4 million cubic feet is also a allowable sale quantity of 3.8 to 5.4 MMCF annually?

*Response: No, the ASQ is a ceiling for the volume of timber harvested on a decadal basis and therefore would not be expressed as a range.*

- 23. (July 5)** I am still looking for maps that display the adopted ROS classes for each alternative. The standards for the preferred alternative (draft plan p. 4-18) make reference to a map of adopted ROS classes

*FW-160: FW-161: New structures and facilities are constructed and maintained to meet the adopted ROS class for the area.*

*FW-162: Recreation opportunity maps will govern all new projects, including special uses. Existing conditions may not meet the assigned ROS classes.*

Where are the maps?

*Response: See the answer to Questions 3 and 19. The standards FW-161 and FW-162 were brought forward from the Jefferson Plan by mistake since they do refer to adopted ROS and that concept is not used in this Draft Plan. This is covered in the Errata.*

- 24. (July 5)** The draft plan (p. 2-28) states:

*It is also necessary, at times, to decommission roads that are no longer required or are causing damage to other natural resources. About 160 miles of road have been identified as potentially available for decommissioning.*

If they have been identified, where are they? Where is the map?

*Response: The Forest Plan provides broad direction on road decommissioning and identifies an objective. Specific roads that would be decommissioned would be identified in a site specific analysis. The TAP does identify roads to be considered for decommissioning and these roads are identified by road number. The maps from Appendix A of the TAP have been posted to the website.*

- 25. (July 5)** On page 3-262 of the draft EIS, the ASQ for the "no action" alternative (A) does not vary by decade.

Table C6.8 Allowable Sale Quantity for All Products by Decade (MMCF)

Alternative	Decade 1	Decade 2	Decade 3	Decade 4	Decade 5
A*	47	47	47	47	47
B	54.3	55.4	60.9	63.3	67.5
C	0	0	0	0	0
D	91.8	91.8	101.0	101.6	111.7
E	31.1	33.0	36.3	39.9	40.4
F	20.4	20.4	21.6	23.8	25.0

G            54.3        55.4        60.9        63.3        67.5

Why have you held the volume constant for the 1993 plan? The 1993 plan did increase volume by decade. Exactly how the 1993 volumes are to be converted to the 2011 conversion rate between cubic feet and board feet is problematic, but the methodology used should be transparent. To show no increase in volume for decades 2-5 for the no action alternative skews the present net value analyses.

*Response: We were unable to locate any estimates in the 1993 Forest Plan or FEIS or administrative process record that indicated how the ASQ would increase for decades 2-5.*

**26. (July 6)** You state on page 2-6 of the draft EIS:

*ALTERNATIVE B*

*This alternative is based on changes to the current plan identified in the Analysis of the Management Situation. The analysis was based on an IDT evaluation of the 1993 Forest Plan direction, monitoring and evaluation results, new policies, best available science and an attempt to balance public issues that were identified as of March 2010.*

The suitable base in alternative B is 476,000 and the acres to be harvested annually range from 1,800 to 3,000. (draft EIS, p. 2-6).

However, in reviewing the Analysis of Management Situation document shown on the GWNF website, and the CER report on which the AMS was based, the suitability review recommends maintaining a suitable base between 350,000 and 370,000 acres.

*Tentative Options or Proposed Actions for Change*

*C-1. a) Strive to maintain at least the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres so as to maintain some capability to meet wildlife habitat, forest health, and the economic status of local community needs. (AMS, p. 115)*

Upon what documentation are you basing claim that the suitable base of 476,000 acres for alternative B is based on the AMS? Is there any other documentation not connected with the AMS on which you are basing your claim?

*Response: As quoted, the AMS recommended striving to maintain AT LEAST the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres. The 476,000 acres of forest suitable for timber production is greater than the range of 350,000 to 370,000 acres and so meets the goal of at least matching that level. After the discussion of the acreage, the AMS recommendation goes on to state:*

*b) Identify all of those NFS lands currently within MA 17 (Timber Production) but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Production.*

*c) Identify all of those NFS lands currently within other MA's but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Harvest*

*The identification of these areas helped to add to the suitable base of 476,000 acres.*

**27. (July 08)** I have read chapter 5 on monitoring in the draft GWNF plan. The paragraph that caught my attention is on page 5-3:

*The Monitoring and Evaluation Framework is part of the Forest Plan and is stated in terms that will direct what will be monitored, but are not so specific as to address how monitoring will be*

*accomplished. The Monitoring and Evaluation Framework will be further refined during Forest Plan implementation into Monitoring Elements and Task Sheets, which are more detailed, specific and measurable than the monitoring questions themselves. Monitoring Elements and Task Sheets may be modified and prioritized to guide monitoring activities over the course of Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet (Appendix H) indicate the nature of Monitoring Elements and monitoring details that are to be further developed during Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet are presented here only for information and may be modified as needed to address changes in needs, priorities, availability of personnel and funding.*

On first reading, this appears to conflict with the requirements for monitoring established in the 1982 planning regulations, under which the GWNF is being prepared.

*(k) Monitoring and evaluation. At intervals established in the plan, implementation shall be evaluated on a sample basis to determine how well objectives have been met and how closely management standards and guidelines have been applied. Based upon this evaluation, the interdisciplinary team shall recommend to the Forest Supervisor such changes in management direction, revisions, or amendments to the forest plan as are deemed necessary. Monitoring requirements identified in the forest plan shall provide for--*

*(1) A quantitative estimate of performance comparing outputs and services with those projected by the forest plan;*

*(2) Documentation of the measured prescriptions and effects, including significant changes in productivity of the land; and*

*(3) Documentation of costs associated with carrying out the planned management prescriptions as compared with costs estimated in the forest plan.*

*(4) A description of the following monitoring activities:*

*(i) The actions, effects, or resources to be measured, and the frequency of measurements;*

*(ii) Expected precision and reliability of the monitoring process; and*

*(iii) The time when evaluation will be reported.*

*(5) A determination of compliance with the following standards:*

*(i) Lands are adequately restocked as specified in the forest plan;*

*(ii) Lands identified as not suited for timber production are examined at least every 10 years to determine if they have become suited; and that, if determined suited, such lands are returned to timber production;*

*(iii) Maximum size limits for harvest areas are evaluated to determine whether such size limits should be continued; and*

*(iv) Destructive insects and disease organisms do not increase to potentially damaging levels following management activities.*

Would you be so kind as to explain in some detail where in the draft GWNF plan the monitoring elements that are required under the 1982 regulations implementing NFMA are written out?

Could the problem stem, perhaps, from the fact that the draft plan's monitoring approach is derived from a publication entitled **LMP Monitoring and Evaluation: a Monitoring Framework to Support Land Management Planning (USFS 2007)**, which was developed at a time that the "Bush" planning rule was in effect? As you are well aware, however, that planning approach was struck down by the courts.

The question that occurs to me is: why not adopt the monitoring components of the 2004 JNF Plan? Aren't we striving for consistency in management approach between the two forests?

*Response: The paragraph quoted from Chapter 5 is nearly identical to the paragraph in the Jefferson Forest Plan which was also prepared under the 1982 planning regulations. Monitoring elements are described in Appendix H of the Draft Forest Plan. The monitoring approach is derived, in part, from the referenced Forest Service publication, but monitoring approaches are not necessarily tied to specific planning rules. Appendix H is quite similar to the Jefferson Forest Plan to achieve better consistency. Your comments on the monitoring needs will be reviewed and responded to in the Final EIS.*

- 28. (July 20)** In your errata version 1 dated June 3, 2011, you show in table 2-17 acres harvested for the all alternatives. I believe you propose in errata version 3 to correct "acres harvested" to "regeneration acres harvested", and this change should be made in errata 1.

Assuming that the acres shown are regeneration acres, what is the source for the 30,000 acres you show for the first decade for alternative A, the no action alternative? Am I not correct that the EIS for the 1993 GWNF plan shows a far lower total for regeneration acreage, especially in table 3-29 on p. 3-119 of the EIS? Depending on what percentage of the group selection acreage is removed on an annual basis, would the total regeneration not be under 24,000 for the decade or approximately 2,400 acres per year? If this is the approximate acreage of regeneration for alternative A, would this not affect the amount of early successional acreage that is displayed elsewhere in the effects analysis, both for the first decade and also in later decades?

*Response: You are correct. An error was made in reading the tables for the 1993 Plan and FEIS and the total acres available for uneven-aged management were added to the acres estimated to be harvested with even-aged management. The correct figures on an annual basis would be 2,300 acres of uneven-aged management and about 80 acres of uneven-aged management. This is corrected in the Errata.*

- 29. (July 21)** In looking further at errata version 1, it appears the figures for alternative G in table 2-17 need to be corrected.

Table 2-17. Comparison of the Timber Harvest Issue by Alternative

	Alternative						
	A	B	C	D	E	F	G
<b>Age Class Distribution in 2040</b>	Percent of Forested Acres						
0-10 (1% in 2010)	3	3	0	5	2	1	2
11-40 (9% in 2010)	7	7	1	10	5	3	5
41-80 (7% in 2010)	10	10	10	8	10	10	10
81-100 (36% in 2010)	1	1	1	1	1	1	1
101-130 (33% in 2010)	34	34	40	34	35	38	35
131-150 (8% in 2010)	25	25	27	24	26	26	26
150+ (6% in 2010)	20	20	21	18	21	21	21

Unless there is a huge increase in the timber harvesting in later decades for alternative A that far surpasses the harvesting in alternative G, the age class distribution for alternative G should be higher in the 0-10 age class than for alternative A. It appears the figures for alternative G match the distribution in alternative E, even though the harvesting is higher in alternative G than in alternative E. I also think the percentage of the forest in the 0-10 age class is higher in alternative B than alternative B, since the amount of regeneration cutting in alternative B is substantially higher in alternative A. Do you agree that these changes need to be made?

*Response: The age class distribution for Alt A as based on the correct acres of regeneration is corrected in the Errata. The age class distribution for Alt G is also corrected in the Errata.*

**30. (July 22)** In reviewing the draft errata version 3, I reviewed table B2.11, shown below.

**Table B2.11 Projected Habitat components in acres and percentage of forested landscape at 10 years by alternative.**

**\*Alternative A includes both early successional habitat created through natural disturbances and through timber harvest. Alternative C includes only early successional habitat created through natural disturbances. Alternatives B, D, E, F, and G only display early successional habitat created through timber harvest.**

Please correct me if I have misinterpreted your table, but it seems to me you are saying that natural forces create an average of 1,888 acres per year, or 18,888 per decade, as shown in alternative C. As you noted, alternative C has no timber program, and the 18,888 acres of early successional habitat are created through natural disturbance. You also state in your footnote that in alternative A, the decade total of early successional habitat of 46,829 is a combination of timber harvesting and natural disturbance. You do not break out what portion of the 46,829 is attributable to natural disturbance, but is it not reasonable to assume that the forces of nature would create the same amount of early successional habitat that you report in alternative C? Your footnote says that alternatives B, D, E, F, and G, include only early successional habitat created through timber harvesting. Is it not reasonable to assume that the forces of nature will also create approximately 18,888 acres of early successional habitat no matter under which alternative the GWNF is managed? Perhaps I missed it, but I don't recall a discussion in the EIS about the contribution of natural forces to creating early successional habitat. Please direct me to the discussion in the EIS if I missed it. From the (draft revised) table you have presented, it appears you are saying that there is just as much early successional habitat created under alternative C, which has no timber harvesting, as in alternative F. In either case, you get 2% of the forest in early successional habitat. This is counterintuitive, but perhaps you have some rational explanation.

*Response: This table has been redone to better display the information. It more clearly describes that the table displays both timber regeneration harvest and natural disturbances in the early successional habitat. The same level of early successional habitat from natural disturbances (16,888 acres) is expected under all the alternatives.*

**xx. (July 22)** In my question of May 28 about budgets, I asked:

I also did not see any display of the budgets associated with management of the GWNF over the life of the current (1993) Plan. Are these figures available? If so, would you please send them?

In your response of July 15, you said:

*Response: Historical budgets since 1993 are included in Appendix E – Budgets and Accomplishment History in the Analysis of the Management Situation.*

The budget information in Appendix E of the AMS is for the combined GWNF and JNF. This is not helpful in a discussion about the GW plan, and not what I asked for. There certainly should be figures for the GW before it was combined with the JNF, and you can use an appropriate methodology of your choice to come up with budget figures for the GW portion of the combined forests since then. This is what should be included in the planning documents, is it not?

*Response: A table displaying the budget information used in the DEIS analysis will be added to the website under the “Key Documents.”*

**31. (July 23)** I was reviewing further the preliminary answers you sent on July 15 to questions I had emailed over the last six weeks. As I noted in my email on May 28, the draft Plan and EIS documents contain no budgets that project how much money it would take to implement each of the alternatives, including alternative G which was the basis for the Plan. In your July 15 answer, you included some figures that you call program budgets that you used in developing PNV and Implan calculations. First, these figures are incomplete. They do not include many of the budget line items needed to fund operation of the GWNF, as shown for the combined GW and JNF in appendix E in the AMS. Have you prepared planning budgets for all the alternatives that include all line items? Second, the amended and full budget figures should be included in the planning documents. While responding to my request for budget figures by sending them to me is appreciated, you did not make any effort to include any budget figures in the errata you were drafting. Full and accurate figures need to be disclosed to the public. Do you intend to include full budget figures in the final version of errata version 3? Third, as I read the 1982 planning regulations, you need to include full budget figures for the plan so that the annual budgets can be compared to the base plan budget to see how these costs compare. If this is not your interpretation of the planning regulation language, what is your interpretation?

*Response: See Response to previous question.*

**32. (July 23)** Continuing my review of the answer you provided on July 15 to my May 28 question about the lack of budget information in the draft Plan and EIS:

As I noted in my email question (31), the budget figures you provided are partial in the line item categories covered. The budget figures you provided appear far too low to disclose how much money would be required to actually implement the various alternatives.

First, once you disclose the budgets actually used to manage the GW since 1993 are disclosed, it will be possible to compare historical real-dollar costs with the costs estimated to implement various alternatives proposed. The historical data should be adjusted with Consumer Price Index factors to reflect current dollars so we are comparing apples to apples.

Second, it is possible to check the reality of the budget estimates for alternative A, which supposedly models the 1993 Plan. The EIS for the 1993 Plan discloses that the budget needed to implement the plan activities is \$15.2 million. (See graph 2-47 on page 2-82 of the EIS) When adjusted to current dollars using price indexing, this is slightly over \$22 million, according to my calculations. In the draft EIS, the budget estimated to implement alternative A (the 1993 Plan) is \$11,262,000. I would appreciate you double checking my figures, but my figures show that the budget you are proposing to implement the 1993 Plan is only half of what they calculated in 1993. I suggest going back in the process records for the 1993 Plan/EIS to see how they arrived at their figures and compare it with how you arrived at the figures you sent to me. Without reliable budget figures, it is impossible to do realistic PNV or Implan calculations, or provide a baseline against which future budgets can be compared as required in the 1982 regs pertaining to monitoring.

*Response: We re-estimated the budget used for Alt A and adjusted costs to better reflect the intent of Alternative A. The estimate for timber roads was not included in future projections since we do not fund timber roads any longer. Costs associated with timber roads are now reflected in the historical revenues for timber.*

**33. (July 23)** I asked on June 19:

3. In Table C 8.3, which displays the maintenance level of the roads, the "No Action" alternative (A), has a higher total road maintenance mileage (1852 miles) than the total miles of roads in the current system (1823 miles). How can that be?

You answered on July 15:

*Response: The higher total mileage of roads is due to the fact that an estimated 29 miles of road would be constructed during the first decade under Alternative 1.*

The 1993 Plan (the no action alternative) actually says:

*The amount of road construction needed to accomplish the timber management and wildlife habitat needs on suitable acres in the Revised Plan is estimated to be 5 to 8 miles of system roads every year during the 10 to 15 year period that the Revised Plan is in effect. This does not include reconstruction or maintenance of existing roads. Additional roads may be needed for a variety of reasons including access to new developed recreation sites, general forest access, and access to wildlife improvements. (p. 2-19)*

Would you like to guess again?

*Response: The road figures in the 1993 were based on estimates of road needs to accomplish the timber and wildlife management programs in the plan. Our current estimates of the road needs to meet the 1993 timber and wildlife management programs are lower.*

**34. (July 23)** On June 5 I asked: Is your link to the EIS of the 1993 GWNF Plan broken? The 93 EIS won't open for me.

On July 15, you responded: *We checked the link and found it to be working.*

Well, of course it was working. After I reported the problem, Karen fixed it. She sent me the following email on June 6, the day after I reported the problem :

*Good morning Jim -*

*I fixed the link so it should be working now. Thanks for letting us know. \*Karen*

She sent a copy of this message to you, Ken.

Don't you think it is appropriate to give credit to Karen for her quick response?

*Response: No response is needed.*

- 35. (July 24)** I am still trying to make sense of the Transportation Analysis Process. I had written to you on July 9:

The draft plan (p. 2-28) states:

*It is also necessary, at times, to decommission roads that are no longer required or are causing damage to other natural resources. About 160 miles of road have been identified as potentially available for decommissioning.*

If they have been identified, where are they? Where is the map?

You responded on July 15:

*Response: The Forest Plan provides broad direction on road decommissioning and identifies an objective. Specific roads that would be decommissioned would be identified in a site specific analysis. The TAP does identify roads to be considered for decommissioning and these roads are identified by road number.*

I did find a link to the **George Washington National Forest Travel Analysis Process (TAP)** document at the bottom of the "key documents" section of the website. On the first page of the report there is a table of contents, which clearly states that Appendix A contains the Minimum Road System Maps. There was no Appendix A included in the document posted on the website. So, where are the maps?

*Response: Those maps are now posted on the website.*

- 36. (July 24)** Reading further in the Transportation Analysis Process (TAP) report and the spreadsheets, I don't see how this process is used to develop the estimated road network needed to implement each of the alternatives outlined in the EIS. The TAP recommendations appear to stand as an independent analysis rather than an analysis that is used to calculate how many miles of roads are needed for each alternative. The TAP identification of 158 miles of roads that should be decommissioned is developed independent of analysis of any alternative. It seems to me that alternative C, which has no timber program, would decommission far more roads (which are not needed for timber harvesting) than the preferred alternative, which is maintaining a timber base of 439,000 acres. Yet, both call for decommissioning 160 miles of road. Alternative C does call for the decommissioning of additional roads located in roadless areas that are recommended for Wilderness. However, roads that are located in roadless areas are not servicing areas that are part of the timber base, so the call for decommissioning of roads in roadless areas is not connected to any consideration of a road system needed to access timber. However, maybe I missed something. Was there a discussion in the TAP documents about the road system needed for each alternative? Was there some analysis other than TAP that led to the figures for a road network needed to implement each alternative outlined in the EIS?

*Response: Timber management is not the only reason for maintaining the road system on the GWNF. Roads provide access for many users and the need to maintain many of the existing roads was an important issue in the DEIS. There was no discussion in the TAP documents about alternatives. The TAP was based on current conditions and then adjustments were made in the DEIS to reflect the varying levels of road decommissioning by alternative. Alternative C also has an emphasis on dispersed recreation use, for which some of the road network is still needed for access.*

- 37. (July 24)** In the Frequently Asked Questions, the question is asked:

5. Why does the Draft Plan maintain the same level of timber harvest, when recent budgets have not funded the levels in the current plan?

Of course this is question based on a false premise and misleads the public. The level of timber harvesting in the draft plan **increases** over the timber harvesting level in the 1993 (current) plan. What accounts for this misstatement, and why has it not been corrected?

*Response: As described in the response to question 28, an error was made in describing the level of regeneration harvest in the current plan. It is corrected in the Errata.*

**38. (July 24)** In my July email, I asked:

*Would you be so kind as to explain in some detail where in the draft GWNF plan the monitoring elements that are required under the 1982 regulations implementing NFMA are written out? This was not addressed in your response of July 15. Perhaps my question did not stand out sufficiently to merit attention. Would it help if I emphasized the importance of receiving an answer to my question by "shouting" it in capital letters? Let's see if this helps:*

WOULD YOU BE SO KIND AS TO EXPLAIN IN SOME DETAIL WHERE IN THE DRAFT GWNF PLAN THE MONITORING ELEMENTS THAT ARE REQUIRED UNDER THE 1983 REGULATIONS IMPLEMENTING NFMA ARE WRITTEN OUT?

*Response: Monitoring is described in Chapter 5 and Appendix H of the Draft Forest Plan. There is no more detail currently available. Your comments on the monitoring needs will be reviewed and responded to in the Final EIS.*

**39. (July 25)** Is there a cumulative map that shows the acres that were burned by prescribed burning, especially since the 1993 plan was implemented?

Is there a cumulative map that shows the acres that were burned by wildfire, especially since the 1993 plan was implemented?

Is there a cumulative map that shows the acres that were harvested, especially since the 1993 plan was implemented?

Is there a cumulative map that shows where early succession habitat was created by natural forces, especially since the 1993 plan was implemented?

If yes, could be put them online? If not, would not it be important to begin this mapping for aid in future planning?

*Response: In the "Key Documents" on the web are links to District maps that display prescribed burning and timber harvest completed since 1993. We do not have maps of wildfires or of early successional habitat created by natural disturbances.*

**40. (July 26)** I've begun looking at the information in the draft plan and EIS pertaining to PNV calculations, IMPLAN, and Spectrum analysis in preparation for the Monday meeting. In order to get through all the information in one day, it would be helpful if you sent me some of the necessary background information.

1. The costs and revenue data for timber that you have presented combines the GWNF with the JNF. According to my addition, the total costs over 15 years was \$37.6 million, or an average of \$2.5 million per year. Again according to my addition, the timber revenues over 14 years was \$25.0 million, for an average of 1.8 million. Although the portion of the total costs and revenues attributable only to the GW, we do know that there are portions of the JNF, especially the Clinch and Glenwood areas, have higher site indices than most parts of the GW. On the face of it, the GW is a "below-cost" forest, and it would be expected that the PNV for all the alternatives would be negatives. It would be

helpful to provide in advance of the Monday meeting those process records that lead you to the conclusion that a positive PNV is reasonable. Can you send those to me electronically?

2. The process records for the 1993 PNV calculations would be helpful to compare and contrast with the current analysis. It would be particularly helpful to seeing how your calculations for A (the no action alternative) compare and contrast with the plan (alternative 8A) in 1993. Could you send those to me electronically?

3. You have sent me budget figures on July 15 that you say were used in economic analysis in the current process. Many of these figures do not look reasonable in light of the past budget data for the GWNF/JNF. You you provide me with background information that shows how you arrived at these figures?

*Response: These are specific questions about a meeting, Karen responded in an email.*

**41. (July 26)** On page C-6 of Appendix C of the Draft Plan, you state:

*Since, on a given harvest entry, only a small portion of a stand's tree density is harvested, the cutting cycles generally result in lower per acre volumes and possible lower total volume, thus reducing the total stumpage value for the harvested products (timber sale revenues are returned to the U.S. Treasury).*

Is there any documentary evidence to support this statement? If so, please send cite it.

*Response: With uneven-aged management, more trees are left over the cutting cycle life of a particular stand than with even-aged management in that stand and regeneration potential in the openings of uneven-aged management stands is not as high as in even-aged management stands. There is no documentary evidence to support the silvicultural statement.*

**42. (July 27)** In preparation for our meeting on Monday I've been reviewing the JNF process, especially Appendix B of the EIS. I had forgotten--it is bereft of detail. Since much of the analysis that you have outlined in the draft of the GWNF documents is based on the models and values developed in the JNF process, it would be helpful for our discussions to get out the JNF process records so we can refer to them. Are these available in electronic form so you can send them to me in advance and help me to focus the questions that are relevant?

*Response: These are specific questions about a meeting, Karen responded in an email.*

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

August 7, 2011

Elizabeth Agpaoa, Regional Forester  
US Forest Service, R-8  
1720 Peachtree Road NW  
Atlanta, GA 30309

Re: GWNF PLAN REVISION PROBLEMS

Dear Regional Forester Agpaoa:

I received a call from R-8 Director of Planning Chris Liggett on August 2, 2011 informing me of the results of a conference call held with planners from the GWNF, Regional Office and Washington Office on August 1, 2011. In that call they discussed how to respond to the scores of emails I had sent to the GWNF planners pointing out deficiencies in the draft Plan and EIS. They decided that the GWNF would issue an “errata” document that would make changes in the draft documents, and then extend the official comment period for the public to comment of the modified Plan and EIS. In this letter I will outline why this is the not the appropriate approach to take.

I met with GWNF Planning Staff Officer Ken Landgraf and Planner Karen Overcash on August 5, 2011 and they outlined in greater detail how they planned to proceed. They confirmed that the GWNF staff would prepare “errata” by the end of next week in response to most of my 44 emails which had detailed errors and deficiencies in the draft documents. This expanded “errata” document would replace the two versions already posted on the GWNF website. They expected to post this document of the GWNF website by the end of the coming week (August 12). They said they would notify the members of the public on the plan revision mailing list of the availability of this “errata” document on the website. Landgraf also said there was continuing discussion about the length of the comment period, and they were leaning toward extending it from September 1 to October 17, 2011. Landgraf thought the Regional Forester would be the responsible official to send this extension notice to the Federal Register.

Assuming you will officially make these decisions, this approach will fail for the following reasons.

1. You will note that I have put quotation marks around “errata” to refer to the documents that the GWNF staff has published, drafted, or proposed. Errata should be used to correct typos such as spelling errors or incorrect page numbers.

It is not an appropriate mode for making changes in the substance of planning analyses.

2. As described by Liggett and Landgraf, the “errata” will be a separate document apart from the draft plan, EIS, appendices, and supporting documentation. The “errata” language will supersede language in the other planning documents but the language in the draft documents will remain physically unchanged. This will be a logistics nightmare for the public because the public will either have to print out thousands of pages of draft documents and then laboriously substitute hundreds of “errata” pages to create an updated hard copy, or they will have to make a separate electronic version of the draft documents and then laboriously cut and paste all of the hundreds of changes from the “errata”. Most members of the public do not have the time or the technical ability to carry out these steps. It is not the responsibility of the public to create an updated version of the document they are attempting to review. It is the responsibility of the Forest Service.
3. The time frame of one week to prepare new “errata” to respond to questions I have raised about the planning analysis in the draft documents is far too short. The “errata” the staff posted on their website on June 13, 2011 and the draft “errata” they sent me on July 15, 2011 were prepared hastily, and as a result contained numerous errors. As I pointed out in emails to the GWNF staff, the hastily prepared “errata” will need to be corrected---“errata” to correct “errata”. The public needs a full review and careful rewrite of the plan and environmental analyses to address the identified problems rather than repeated corrections of hastily drafted responses. As I have pointed out often during this planning process, it is better to take the time to do it right the first time rather than doing it over two, three or more times.
4. Ken Landgraff said the “errata” would consist primarily in changes to tables. The tables are the tip of the iceberg. The tables are merely the summary of analyses that have been done. Certainly the tables need to change but it is even more important to revise the analyses or plan components on which the tables are built.
5. Chris Liggett said that changes in the analyses would be done between draft and final. The time to make changes in analyses that are known to be inadequate based on the “errata” should not be delayed. The public should not be asked to comment on analyses that are known to be erroneous. Changing the analyses after the public comment period closes will deprive the public of the opportunity to provide meaningful comment.

6. There are serious NEPA and NFMA violations that were outlined in earlier letters and emails that cannot be addressed through “errata”.

Several interested citizens have suggested to Maureen Hyzer, the Forest Supervisor, and her planning staff, that the only way to adequately address these problems is to prepare a supplemental draft to the Plan and EIS. We have not received a response to our proposal from the Forest Supervisor, who is away on detail. We have scheduled a meeting with her for mid-September, the first available time after her return. However, our suggestion for a supplemental draft will be moot by the time we meet again, if the approaches that have been outlined by the Regional Director of Planning and the GWNF Planning Staff Office are put into effect.

The GWNF Planning Staff Officer, who is also the Acting Forest Supervisor in the absence of Maureen Hyzer, said everyone was tired of planning and just wanted to get on with implementing a final plan. That is a poor excuse for avoiding a full response required to address the serious deficiencies in the planning process that have been identified. The late Ron Lindenboom, the competent planner who prepared the 1993 GWNF Plan, was fond of saying, “We never seem to have time to do it right the first time, but we always seem to have time and money to do it over.”

I called your executive assistant, Silvia Ramirez, on August 1, 2011 to request setting up an extended phone call with you to discuss how to proceed with the GWNF revision. I hope you will schedule a call so we can discuss in some detail the reasons why a supplemental draft rather than posting more “errata” is the appropriate path to follow.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc:

Tom Tidwell, Chief  
Tim DeCoster, Chief of Staff  
Joel Holcomb, Deputy Chief  
Tony Tooke, Director EMC  
Richard Rine, Planning/NFMA  
Jerome Thomas, Deputy Regional Forester  
Chris Liggett, Director of Planning  
Maureen Hyzer, GW/Jeff Forest Supervisor  
Ken Landgraff, GW/Jeff Planning Staff Officer  
Karen Overcash, GW/Jeff Planner  
Rupert Cutler  
Robert Giles, Jr.  
Tammy Belinsky

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

August 27, 2011

Elizabeth Agpaoa, Regional Forester  
US Forest Service, R-8  
1720 Peachtree Road NW  
Atlanta, GA 30309

Re: GWNF PLAN REVISION PROBLEMS

Dear Regional Forester Agpaoa:

I received a call from your executive assistant, Silvia Ramirez, on August 17, 2011 to discuss setting up an extended phone call with you on September 1 at 10:30 a.m. to discuss how to proceed with the GWNF revision

Despite the warnings in my letter of August 7, 2011 that using “errata” would fail to correct the deficiencies in the draft documents, the GWNF staff posted voluminous “errata” on the GWNF website dated Thursday, August 11. Ten days later I received a letter from Planning Staff Officer Ken Landgraf, in his capacity as Acting Forest Supervisor, notifying the public about the availability of “errata” on the website. In response to my request, the GWNF staff sent me a printed version of the “errata” totaling approximately 400 pages.

Based on my limited review, it is evident the problems with the “errata” are much worse than I had predicted in my letter of August 7, 2011.

1. The “errata” fail to correct many of fundamental problems with the draft documents.
2. The hastily prepared “errata” need to be corrected---“errata” to correct “errata” to correct “errata”.
3. The “errata” introduced errors that were not in the original.
4. Changes have been made in some parts of the documents but not in others.
5. Instead of one “errata” list, there are 16 separate “errata” documents. They are not integrated into the text of the draft documents.

6. For the public trying to understand what has been changed and what has not, this is a logistical nightmare.
7. The public is told that we will not have the opportunity to review key analyses during the comment period because they will be created or changed later.
8. There are serious NEPA and NFMA violations not addressed through “errata”.

It should be obvious from even a cursory review that the Forest Service is using “erratas” to crudely revise the draft documents rather than merely correct printing errors. Before our September 1 call I hope you will spend some time looking at the GWNF website to review the “errata” and the draft documents so we do not spend our time reviewing the problems outlined above. Rather, I hope we can discuss in some detail the reasons why a supplemental draft is necessary to address the deficiencies in the draft documents.

Sincerely,

/s/ James E. Loesel

James E. Loesel, Secretary

cc:

Tom Tidwell, Chief  
Tim DeCoster, Chief of Staff  
Joel Holcomb, Deputy Chief  
Tony Tooke, Director EMC  
Richard Rine, Planning/NFMA  
Jerome Thomas, Deputy Regional Forester  
Chris Liggett, Director of Planning  
Maureen Hyzer, GW/Jeff Forest Supervisor  
Ken Landgraff, GW/Jeff Planning Staff Officer  
Karen Overcash, GW/Jeff Planner  
Rupert Cutler  
Robert Giles, Jr.  
Tammy Belinsky

## QUESTIONS #43 THROUGH #89

43. (July 30) On page B-23 of Appendix B to the EIS, there is a heading for **Sediment Effects Analysis**. On the following two pages there is a discussion about soil productivity, but no where in that section, or any other part of that appendix, did I see a discussion of sediment yield. Where is the discussion of the methodology used to calculate the effects of sediment deposition? And where are the results of such methodology? I saw no tables comparing the sediment yields for each of the alternatives.

*RESPONSE: The heading in Appendix B of the DEIS should have been "Soil Productivity Analysis" and will be corrected in the Final EIS and a section for Sediment Effects Analysis will be added. Chapter 3, DEIS, Direct and Indirect Effects for Water on page 3-49 discusses sediment effects and concludes with Table A6.3 Acres of Soil Disturbance by Alternative as the measure for the relative effects of the alternatives on sediment and water quality. Sediment yield was not calculated for the alternatives. The primary factor that varies in estimating sediment yield is the amount of soil disturbance. Rather than calculating a derivation of soil disturbance, we used acres of soil disturbance to compare alternatives in relation to their effects on soils and water resources. The amount of soil disturbance is based on the amount of road construction and decommissioning, timber harvest, prescribed fire, trail construction, and wind energy development.*

44. (August 1) During the discussion with Karen this morning, I said I had not seen a discussion in the draft documents about the amount and cause of early successional habitat created through natural disturbance. Karen thought that Carol had included a discussion but I only found a single sentence.

*The lowest is 16,888 acres at 10 years under Alternative C, which assumes no timber harvesting and only natural disturbances creating early successional forest, modeled at 1% (Table B2.11).*

This sentence is repeated in several section of Chapter 3 of the draft EIS. Karen thought the figure was based on 2% of the forest, but it appears to be 1%. I asked Karen what the origin of the natural disturbance figure is, but she did not know on what analyses this was based. It is also not clear from the discussion in Chapter 3 that natural disturbance is included in Alternative A, as indicated in your response to one of my questions. I did several word searched in both the plan and the EIS that might indicate a discussion about natural disturbance to create early succession but nothing showed up. If I missed something relevant, could you please direct my attention to the pages. It seems abundantly clear to me that the entire discussion in chapter 3 needs to be rewritten to disclose the environmental effects of natural disturbance in addition to any management-caused early succession. If you disagree, please detail your rationale.

We can include this as a topic on the conference call, along with the 22 other items that have not been answered so far and the multiple items that were answered incorrectly. Chris, just to remind you, my phone number is 540-774-6690.

*RESPONSE: The Errata for the DEIS document clarifies that Tables 2-5, B2.11 and B2.12 include natural disturbance. See also response to question 48.*

45. (August 4) The budget that Lindenboom calculated necessary to implement the preferred alternative (8A) in 1993 was \$15.2 million. That figure appears in the 1993 EIS as I've pointed out previously.

Your spreadsheet total for 1993 plan only got to \$14.153 million. I understand there may be some adjustment because of savings in overhead due to combining the GWNF with the JNF offices, but your figures suggest this amounts to \$637,500. I suggest redoing the spreadsheet so it is very clear any adjustments from the \$15.2 million base.

*RESPONSE: We used the FORPLAN analysis in the 1993 process record, upon which the 1993 FEIS was based. We used these figures as a starting point for Alternative A in the DEIS Errata and adjusted them if conditions had changed. Appendix F costs from the 1993 Forest Plan are also included for reference, but they did not always match the EIS/FORPLAN costs. See also the Response to question 69.*

*Alt A in DEIS Errata:*

*CACA General Administration:*

*Inflated EIS/FORPLAN = 1,750,000 \* 1.45 = 2,537,500.*

*Inflated App F costs = (NFGA) 1,750,000 \* 1.45 = 2,537,500.*

*Figure used in original DEIS= 1,900,000*

*Two Forests consolidated resulting in savings in overhead costs so DEIS Errata = 1,900,000.*

*Facilities (CMFC Recreation Facilities and CP09 FAO Facilities):*

*Inflated EIS/FORPLAN = 500,000 \* 1.45 = 725,000*

*Inflated App F = (CNRN, Activity AN22) 1,500,000 \* 1.45 = 2,175,000.*

*Figure used in original DEIS: CMFC=530,062 and CP09= 481,500*

*DEIS Errata = 725,000 (CMFC=530,062 and CP09=194,938).*

*CMLG Legacy Roads: no decommissioning.*

*CMRD Roads:*

*Inflated EIS/FORPLAN = 1,600,000 \* 1.45 = 2,320,000.*

*Inflated App F costs = (CNRN) 842,200 + (CNGP) 562,900 + (NFRD) 1,400,000 = 2,805,100 \* 1.45 = 4,067,395. No more funded timber road construction*

*Figure used in original DEIS= 1,352,800*

*DEIS Errata = 2,320,000.*

*CMTL Trails:*

*Inflated EIS/FORPLAN = 600,000 \* 1.45 = 870,000.*

*Inflated App F costs = (NFTR) 400,000 + (CNTR) 200,000 = 600,000 \* 1.45 = 870,000.*

*Figure used in original DEIS= 580,000*

*DEIS Errata = 870,000.*

*NFRW Recreation:*

*Inflated EIS/FORPLAN = 3,233,300\*1.45=5,398,785*

*Inflated App F costs = (NFRM) 2,500,000 + (NFHR) 550,000 = 3,050,000 \* 1.45 = 4,422,500.*

*Figure used in original DEIS= 2,250,000*

*DEIS Errata = 5,398,785.*

*NFLM Lands:*

*Inflated EIS/FORPLAN = 1,060,000 \* 1.45 = 1,537,000.*

*Inflated App F costs = (NLFA) 450,000 + (NFLL) 625,000 = 1,075,000 \* 1.45 = 1,558,750.*

*Figure used in original DEIS= 427,300*

*DEIS Errata = 1,537,000.*

*NFMG Minerals:*

*Inflated EIS/FORPLAN = 150,000 \* 1.45 = 217,500.*

*Inflated App F costs = (NFMG) 150,000 \* 1.45 = 217,500.*

*Figure used in original DEIS= 190,000*

*DEIS Errata = 217,500.*

*NFPN Planning, Inv & Monitoring:*

*Inflated EIS/FORPLAN = 247,000 \* 1.45 = 358,150.*

*Figure used in original DEIS= 400,000 (NFPN = 100,000 and NFIM = 300,000)*

*DEIS Errata = 358,150 (NFPN=100,000 and NFIM = 258,150).*

*NFRG Range:*

*Inflated EIS/FORPLAN = 14,000 \* 1.45 = 20,300.*

*Inflated App F costs = (NFVM) 13,000 \* 1.45 = 18,850.*

*Figure used in original DEIS=10,000*

*We now have fewer allotments, so DEIS Errata = 10,000.*

*NFTM Timber:*

*Inflated EIS/FORPLAN costs = 1,565,500 \* 1.45 = 2,269,975.*

*Inflated App F costs = (NFTI) 82,000 and (NFRF) 215,000 + (NFSP) 670,300 +  
(NFGT) 15,000 + (NFHA) 261,300 + (NFTP) 88,900 + (NFSE) 262,500 = 1,595,000  
\* 1.45 = 2,312,750.*

*Figure used in original DEIS=1,880,000*

*DEIS Errata = 2,878,975 (=2,269,975 + 609,000). (Including NFVW silviculture funds)*

*NFWF Wildlife and Fish:*

*Inflated EIS/ FORPLAN = 1,203,000 \* 1.45 = 1,744,350.*

*Inflated App F costs = (NFWL) 800,000 – 171,000 (estimated Rx fire acres moved to  
Fire out of Activity CW222) + (NFIF) 450,000 + (NFTE) 400,000 = 1,479,000 \* 1.45  
= 2,144,550.*

*Figure used in original DEIS=572,850*

*DEIS Errata = 1,573,350 (1,744,350 - 171,000 for Rx fire).*

*WFPR Fire:*

*Inflated EIS/FORPLAN = 650,000 \* 1.45 = 942,500.*

*Inflated App F = (FFFP) 710,000 + (CW222) 171,000 estimated Rx fire \* 1.45 = 1,277,450.*

*Figure used in original DEIS=1,042,500.*

*DEIS Errata = 1,113,500 (942,500 + 171,000 for Rx fire).*

*NFVW Soil, Water and Air:*

*Inflated EIS/FORPLAN = 825,000 \* 1.45 = 1,196,250.*

*Inflated App F = (NFSO) 533,400 + (NFSV) 230,000 + (NFSI) 75,000 + (NFIP) 2,000 = 840,400 \*  
1.45 = 1,218,000.*

*Figure used in original DEIS=1,370,956*

*DEIS Errata = 972,080. (Without NFVW silviculture funds)*

46. (August 4) Look further at your spread sheet, I noticed that you had budget figures for 2009 for the GWNF/JNF in column I. The total was \$21,724,484.41. That is different from the 2009 budget figures for the two forests presented in the AMS, where it is \$28,473,639. The two should be the same, shouldn't they? If the AMS figure is not correct, it calls into question all of the other figures for past years, which I hope is not the case. I hope you'll be able to correct and send sometime today.

*RESPONSE: The 2009 figures are for the annual budget. The AMS figures are for total expenditures for the year. Total expenditures often include items that are not included in the allocation for an annual budget. The AMS figures include the Working Capital Fund for fleet, wildfire suppression, highway funds*

*for specific projects, grants, trust funds, etc. The budget figures only include allocations that can be reasonably planned.*

47. *Number skipped?*

48. (August 15) I'm still trying to understand where the figure used in the draft documents for the acreage of early successional habitat created through natural processes came from. The number cited, 16,888 for the decade, is very precise. Please send me electronically the process paper in which that number is arrived at and the calculation that was used. I asked Karen, and she just said it came from the 2% of the forest that was sometimes talked about during the JNF planning process. However, 16,888 acres does not equate to 2% of the forested area of the GWNF. Moreover, there are times the GWNF draft EIS chapter 3 says the 16,888 is 2% of the forest, at other times the percentage due to natural disturbance is cited as 1% of the forest, and at other times the percentage is expressed as the range of 1%-2%. If it is a range, then there should be a range of acreage, should it not? If it is just a SWAG (Scientific Wild Assed Guess), who was the scientist or who were the scientists that made the estimation?

*RESPONSE: The estimated amounts of regenerating forests and open woodlands produced by natural disturbances were estimated by ecological system. For the cove system, gap phase replacement occurs on a small scale and is incorporated into the acres of late-successional, open canopy conditions, so no additional natural disturbance regenerating acres were estimated for this system. Fire is not generally a major disturbance in these systems, so the acreage of current open canopy, as defined by analysis of Landfire canopy density data, was used as a background level. For northern hardwoods, the area of regenerating forest from natural disturbances was estimated at 1 percent of the total area and the area of open woodlands from natural disturbances was also estimated at 1 percent of the total area plus the current amount of open woodlands derived from the Landfire open canopy density data. In the oak forests, which are subject to more disturbances, the area of regenerating forests from natural disturbances was estimated as 2 percent of the total area. The area of open woodlands from natural disturbances in the oak systems was estimated at 2 percent of the total area (which closely approximated the amount derived from the Landfire open canopy density data. For the pine systems, the area of regenerating forests from natural disturbances was estimated at 1 percent of the total area. The area of open woodlands from natural disturbances in the pine systems was estimated at 1 percent of the total area.*

49. (August 15) I visited the GWNF Revision website and clicked on the following link:

NEW - Letter from the Forest Supervisor (8/12/11)

Nothing happened. It 's not a link to anything. That is a common occurrence on your website. Do you not check to see if your website actually has operational links?. I've pointed out this problem in the past, and I've not checked many of the links. There is always the chance that the website functions differently from inside the FS system intranet vs. accessing the FS documents via the internet. Why not check on all the links to documents from a computer outside the FS system to get everything operational?

*RESPONSE: The link is working now.*

50. (August 16) This morning I was able to open the letter from (Acting) Forest Supervisor Kenneth Landgraf that was posted on the GW website. Thanks for responding quickly to the email I sent yesterday pointing out that the link did not work.

I noticed there were two hyperlinks outlined in blue in the text of the letter. They did not work. One was:

Comments can be emailed to: [comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us) and the other was: (<http://www.fs.fed.us/r8/gwj>). As I said in yesterday's email, it would be helpful to the public if you made certain that all the links are operational.

Your letter said:

*If you have any questions or would like a paper copy of the Errata, please call Karen Overcash at 540-265-5175 or send a request to the email address above.*

Please send me a paper copy.

I'm sure there will be more questions.

*Response: (August 16) Since the letter was sent as a hard copy to everyone and since the electronic copy is already on our website, I didn't think it was necessary for the web site location and email address to be hyperlinked. Do you think people would need that link to be operational?*

*A hard copy will be put in the mail tomorrow.*

(August 17) If it's set up to look like a hyperlink, then it should be operational. If you don't want it to be operational, make the print black instead of blue and don't have a link pop-up box appear when you put a pointer on the "link".

*RESPONSE: We were not anticipating that people would follow the links embedded in that letter but we will be aware of that potential in the future.*

51. (August 17) I didn't see a link to the Federal Register notice of extending the comment period listed on the GWNF website. Could you send me a copy electronically and also post it on the website?

(August 17 ) Here's another "link" that doesn't link.

#### NEW INFORMATION

Comment Period - Extended

The comment period for the [Draft Forest Plan and Draft Environmental Impact Statement](#) has been EXTENDED UNTIL OCTOBER 17, 2011.

*RESPONSE: Checked link several times and found it to be working. A copy of the Federal Register Notice (dated Aug 26) mailed electronically to Jim on Monday August 2 and posted on the website on Friday Aug 26.*

51 Duplicate. (August 18, 2011) As you well know, I have asked multiple questions about the budgets projected for the various alternatives and the budgets used to calculate PNV costs. You posted one of my questions in the expanded FAQ under the errata section.

**b. The budget information in Appendix E of the AMS is for the combined GWNF and JNF. Are there**

**more detailed figures for just the GWNF?**

You gave the following answer to this question:

***A table displaying the budget information used in the DEIS analysis has been added to the website under the "Key Documents."***

I went to the Key Documents page and carefully inspected each and every item--all 43 of them--and the promised budget table was not to be found. What explanation do you have for not following through on your promise?

As you well know, I have said that this information should be included in the EIS, as such budget information has in previous EIS for the JNF and the GWNF plans. What explanation do you have for not making these figures part of the EIS?

*RESPONSE: The spreadsheet was not posted until September 7, due to other work scheduling conflicts. The historic budget information has now been separated by national forest and posted on the website. We felt that the historic budget information belonged in the AMS. We will look at including the information in the final EIS.*

52. (August 18) **In response to my question 33, you said:**

*Response: The road figures in the 1993 were based on estimates of road needs to accomplish the timber and wildlife management programs in the plan. Our current estimates of the road needs to meet the 1993 timber and wildlife management programs are lower.*

Please provide your detailed documentation for the claim that current estimates to achieve 1993 timber road needs are lower and should override the calculations made as part of the 1993 plan.

*RESPONSE: There is not detailed documentation. Review of road construction needs versus wildlife and timber programs over the past 15 years resulted in the revised estimate.*

53. (August 18) In response to my question 4, you provided a table titled: **Program Costs (M\$'s, average cost for decade)**

What is included in the line item for fire? Is it for prescribed fire only? Does it include the cost of fighting wildfire? If it does not include the cost of fighting wildfire, where is that cost included in program costs?

*RESPONSE: It includes the funding for the prescribed fire program and funding for pre-suppression activities for wildfires. It does not include the cost of fighting wildfires. Wildfire suppression is not part of our annual appropriation and is not included in our costs.*

53 Duplicate. (August 20) In your answer to my question 4 about budgets, you said that the PNV analysis had been redone: *The PNV calculations for each alternative were re-run and are included in the Errata.*

However, I did not see evidence that the PNV analyses cited in the AMS or Appendix B were redone. There may be many other references dispersed in the documents that include PNV figures or are based on PNV. Why did you not make all the changes and instead focus only on making the change in one table in chapter 3 of the draft EIS? Are you going to systematically go through the draft documents and process records to correct PNV data and the analyses about PNV? Are you planning to do this in additional errata or a supplemental draft so the public can review this information?

*RESPONSE: It was an oversight that the PNV data was not corrected in Appendix B but it will be in the final EIS.*

54. (August 20) You revised the costs that are used in PNV analyses but I did not see any changes on the benefit side. You made numerous changes in the outputs for various resources in various

alternatives, which necessitates changes in the PNV benefits, does it not? Are you planning to revise the benefit calculations and the PNV analyses in additional errata or a supplemental draft so the public can review and comment?

*RESPONSE: The timber resource benefits are based on the volume of the different wood products, and not acres. Therefore, the benefit calculations for Alternative A were correct. The volume estimates that were corrected in the Errata were table entry errors. The PNV analysis used the correct volumes.*

54 Duplicate. (August 20) I am starting my review of the budget figures which you included in the additional FAQ. I'm sure there will be several questions that arise as I examine the figures, but the first question that occurred to me regards the line item budget for fire. The budget figure listed for Alternative C was an annual cost of \$1,461,000. Is this figure correct? The budget for fire in Alternative A is \$1,231,000 to accomplish an average of 3,000 acres prescribed burning. Is this figure correct? Since the fire budget that you show for Alternative C is substantially higher than the figure you show for Alternative A, this would suggest that the acre to be burned in Alternative C would be substantially higher than the 3,000 acres called for in Alternative A (the 1993 plan). Your description of the prescribed fire program for Alternative C (see EIS p. 2-9) is: *Very limited use of prescribed fire, for TES species*. In other tables you show that the prescribed fire program for Alternative C is 0. What acreage did you use to calculate a fire budget of \$1,461,000 for alternative C? It seems that whatever figure you used should be disclosed in the description of the alternative and in tables showing the levels for various alternatives.

It is also not clear how much "open woodland" habitat is created by prescribed fire in alternative C. Could you explain what amount is "open woodland" is attributable to the prescribed fire program in alternative C and how much is attributable to wildfire and other natural events?

*RESPONSE: The budget for fire includes fire pre-suppression as well as prescribed fire. Without a prescribed fire program in Alt C, there will likely be an increase in the amount of wildfire. The funding for fire was about the same for Alternatives A and C before the distribution of the overhead funds among the various budget items. Since the timber budget is zero in Alternative C, more of the overhead is distributed to each of the other budget items and thus the funding figure for fire is larger in Alternative C. The amount of prescribed burning is expected to be low. The budget figure used is the same as in Alternative A, since it is expected that unit costs to perform any needed burning would be higher, since less total acres would be burned. No open woodland was attributed to prescribed burning in Alternative C. The acreage of open woodland attributed to natural disturbance in Alternative C is 19,249 acres.*

55. Skipped number?

56. (August 20) I don't understand why the wildlife budget figures you show for Alternative A are very much larger than for all the other alternatives. What differences are there in outputs that would account for an annual cost of \$1,739,000 in alternative A and \$731,000 in Alternative G? What costs an extra million dollars in Alternative A that you don't get in each of the other alternatives? Could it be that the figures for alternatives B-G are just unrealistically low? Please send me your calculations or process paper that details how you arrived at each of the budget figures for wildlife.

*RESPONSE: The costs for Alternative A were taken from the 1993 Forest Plan. It is difficult to determine why the costs were much higher. The costs for alternatives B, E, F, and G are based on annual budget requests for wildlife and fisheries activities. Alternative C is reduced to reflect a reduction in maintaining current grass openings and the increase in Alternative D reflects an increase in grassy openings.*

57. (August 20) Could you send me electronically the GWNF/JNF budget for FY 2010 and 2011 so I can see how budget figures for the last two years compare to years before 2009, which are displayed in the AMS? Would it be possible to put them in a format similar to those shown in the AMS or in the monitoring reports and put them on the website for public review and use?

*RESPONSE: Yes*

58. (August 20) I was reviewing the budget figures for Lands. I noticed there was a huge disparity between the Lands budget for Alternative A and all others. For Alternative A, the budget (adjusted for 2009 dollars) was \$1,701,000 per year. For the other alternatives, the figures ranged from \$488,000 in Alternative B to \$515,000 in Alternative C, with the preferred Alternative G at \$491,000. I did some research to see what might account for such a huge difference between Alternative A and all other alternatives.

I was able to locate an Appendix E to the 1993 GWNF Plan, which detailed the various components of the lands program. The index showed the following components of the lands program

<b>Landownership Adjustments .....</b>	<b>E-1</b>
<b>Special Land Uses .....</b>	<b>E-3</b>
<b>Appalachian National Scenic Trail .....</b>	<b>E-4</b>
<b>Right-of-way Grants for Roads (Easements) .....</b>	<b>E-5</b>
<b>Land Status Maintenance .....</b>	<b>E-5</b>
<b>Landline Location .....</b>	<b>E-6</b>
<b>Boundary Maintenance .....</b>	<b>E-6</b>
<b>Other Land Title Claims and Encroachment .....</b>	<b>E-7</b>
<b>Land Sales, Grants and Selections (Small Tracts Act) .....</b>	<b>E-7</b>
<b>Rights-of-way Acquisition .....</b>	<b>E-8</b>

There were multiple objectives that detailed the management of each of these components. Including:

**Establish 121 miles of landline per year. This is considered the minimum acceptable level to complete the remaining 1,325 miles.**

**Maintenance will be required on the existing 1598 miles of boundary line once every 10 years (160 miles annually).**

**Maintenance of the 2,923 miles of boundary line, once established, will be at the same rate and schedule, every 10 years.**

Then I looked at the current draft documents. There was no appendix, and the Lands section in the draft Plan was very brief. There was only one objective:

**Objectives for Land and Special Uses**

**OBJ LAN-1: Survey and maintain to standard about 100-150 miles per year of boundary lines.**

Unlike the 1993 Plan, the proposed plan does not distinguish between surveying the land lines that are not clearly determined and maintaining known line with fresh red paint.

The draft Plan asserts that LANDS was an INSIGNIFICANT ISSUE. The rationale given was:

**REASON FOR NON-SIGNIFICANT ISSUE: This issue is limited in extent across the Forest and is unlikely to vary by alternative. (EIS, p. 1-14.)**

This is clearly false. The lands issue is everywhere across the GWNF, and varies enormously between Alternative A ( the 1993 Plan) and Alternative G (the draft Plan). Do you disagree?

I then looked at the historic budget line for Lands, as shown in Appendix E of the AMS. The Lands line item for the last four years shown (2006-09) averaged a little over \$500,000 for the combined GWNF/JNF. If the GW portion is half of that, the Lands budget for that four year period is approximately \$250,000; if the budget is apportioned according to acreage, the GWNF portion would be approximately \$300,000. This is only a small fraction of what was seen as needed under the 1993 Plan, and it is substantially below what is projected as the budget needed to implement the proposed Plan. The proposed Plan has a Lands budget of \$491,000. It is clear to me that the proposed Land component of the draft Plan, woefully inadequate though it is, is unlikely to be funded. Do you disagree?

Do you not agree that what is needed is an honest engagement of the very serious problems that will be encountered during the life of the next Plan because there is not enough money to do what should be done? Do you not agree this is a SIGNIFICANT ISSUE? Do you not agree there need to be objectives for the various components of the Lands program that are realistic and set priorities for accomplishment based on budget realities?

*RESPONSE: The Forest Plan identifies desired conditions and objectives to move towards that condition. We considered past funding when establishing our objectives and tried to keep the objectives within a reasonable range of funding of what has been allocated in the past. The level of funding that would be desirable does not vary by alternative. We did not consider this to be a significant issue. There may be a need for further discussion of the implications of the landline program in the analysis.*

59. (August 20) This is a digression from budget/economic analysis/questions, but when I looked up LANDS, I saw the GRAZING was also listed as a NON-SIGNIFICANT ISSUE. This is surprising, in light of the recommendation of the Forest staff in the AMS. Here is what you said:

**a. Is a Change in the Plan warranted? Yes**

**b. Why? Maintaining pastoral settings through grazing may not be appropriate on each of the five allotments. On the South Fork of the Shenandoah River, pastoral settings are common. However, Eastern Riverfront Hardwood communities (Bottomland Hardwoods) are not common. The JNF Plan (pages 3-170 and 3-178) recognizes the importance of this ecosystem, while the George Washington currently does not.**

**As a corollary, if pastoral settings is appropriate, and since cattle still have access to the streams for water, there is a need to strengthen the desired conditions and standards and guidelines under which grazing can occur. Utilizing just cattle to maintain a pastoral setting may not be appropriate. Currently the Curl tract's setting is maintained by mowing or haying. Utilizing cattle may conflict with trying to have intact riparian corridors and high water quality given that cattle have access to the stream/river water for drinking. Management of the allotments could become a model for other privately managed farms in the valley.**

**Likewise, the NRCS is the leader in agricultural conservation in the United States and its [standard practices](#)**

**on reducing effects from cattle grazing should be adopted by the Forest Service. NRCS can recommend appropriate practices for these allotments.**

**c. Tentative Options or Proposed Actions for Change**

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

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

**AMS-169**

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

**b) Adopting Jefferson Plan Forestwide range standard FW-212.**

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

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

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

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

**5. What are the Consequences of Not Changing?** Cattle will still graze and will still have access to the rivers and streams. The Forest would continue to attempt to remove cattle access to rivers and streams on a sitespecific basis as funding permits.

**Proposed Action** Propose Option C2.

Why did you decide not to carry through with Option C2 in the Plan?

*RESPONSE: We did carry through, except that the objectives were modified.*

### **Desired Conditions for Rangeland Resources**

A landscape that includes pastoral landscapes and bottomland hardwoods exists.

Healthy forage for domestic livestock and valuable grassland/shrubland habitat for various wildlife species is provided.

Rangelands are not contributing to the degradation of water quality, aquatic species, or threatened, endangered or sensitive species habitat.

59 Duplicate. (August 20) So I went back to look at the budget figures you had sent me as part of the response to 42 of my questions.

--In response to question 4 you said the budget for recreation in Alternative A was \$1,931,000 per year.

--In the "errata" you included my question as one of the additional FAQ, the answer you gave for the budget for recreation in Alternative A was \$1,739,000. That was the figure that I used in my question # 56.

Which is correct? What is your explanation for giving two different numbers in response to the same question? Do you understand why I don't trust anything you say?

*RESPONSE: I assume you meant the wildlife budget and not the recreation budget. The answer to question 4 was prepared after an early review of the budget data. It was modified after that. The current Errata and FAQ are correct.*

60. Skipped number?

61. (August 21) I am starting my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

Starting at the end:

42. (July 27) In preparation for our meeting on Monday I've been reviewing the JNF process, especially Appendix B of the EIS. I had forgotten--it is bereft of detail. Since much of the analysis that you have outlined in the draft of the GWNF documents is based on the models and values developed in the JNF process, it would be helpful for our discussions to get out the JNF process records so we can refer to them. Are these available in electronic form so you can send them to me in advance and help me to focus the questions that are relevant?

*Response: These are specific questions about a meeting, Karen responded in an email.*

I am still interested in reviewing the JNF process records, since you have based much of the current Spectrum modeling on the JNF process. As I asked, are they available in electronic form? If so, please send them to me. If not, can they be placed in the "Loesel" public room available for public review?

*RESPONSE: We will put these on a CD.*

62. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**41. (July 26)** On page C-6 of Appendix C of the Draft Plan, you state:

*Since, on a given harvest entry, only a small portion of a stand's tree density is harvested, the cutting cycles generally result in lower per acre volumes and possible lower total volume, thus reducing the total stumpage value for the harvested products (timber sale revenues are returned to the U.S. Treasury).*

Is there any documentary evidence to support this statement? If so, please send cite it.

*Response: With uneven-aged management, more trees are left over the cutting cycle life of a particular stand than with even-aged management in that stand and regeneration potential in the openings of uneven-aged management stands is not as high as in even-aged management stands. There is no documentary evidence to support the silvicultural statement.*

Since I challenged the assertions and you are unable to support your statements, why were they not removed from the draft?

*RESPONSE: We believe that the statement is based on common knowledge and the statement is fine the way it is.*

63. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**40. (July 26)** I've begun looking at the information in the draft plan and EIS pertaining to PNV calculations, IMPLAN, and Spectrum analysis in preparation for the Monday meeting. In order to get through all the information in one day, it would be helpful if you sent me some of the necessary background information.

1. The costs and revenue data for timber that you have presented combines the GWNF with the JNF. According to my addition, the total costs over 15 years was \$37.6 million, or an average of \$2.5 million per year. Again according to my addition, the timber revenues over 14 years was \$25.0 million, for an average of 1.8 million. Although the portion of the total costs and revenues attributable only to the GW, we do know that there are portions of the JNF, especially the Clinch and Glenwood areas, have higher site indices than most parts of the GW. On the face of it, the GW is a "below-cost" forest, and it would be expected that the PNV for all the alternatives would be negatives. It would be helpful to provide in advance of the Monday meeting those process records that lead you to the conclusion that a positive PNV is reasonable. Can you send those to me electronically?

2. The process records for the 1993 PNV calculations would be helpful to compare and contrast with the current analysis. It would be particularly helpful to seeing how your calculations for A (the no action alternative) compare and contrast with the plan (alternative 8A) in 1993. Could you send those to me electronically?

3. You have sent me budget figures on July 15 that you say were used in economic analysis in the current process. Many of these figures do not look reasonable in light of the past budget data for the GWNF/JNF. Can you provide me with background information that shows how you arrived at these figures?

*Response: These are specific questions about a meeting, Karen responded in an email.*

The meeting did not answer my questions, and I am still interested in the information I requested so I can continue preparation for commenting on the GWNF draft documents. Please send me the information requested.

*RESPONSE: As identified in the Errata, timber program costs were adjusted in the PNV calculations and all of the alternatives except for Alt C and Alt D have negative PNVs for the timber program for at least the first two decades.*

64. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**39. (July 25)** Is there a cumulative map that shows the acres that were burned by prescribed burning, especially since the 1993 plan was implemented?

Is there a cumulative map that shows the acres that were burned by wildfire, especially since the 1993 plan was implemented?

Is there a cumulative map that shows the acres that were harvested, especially since the 1993 plan was implemented?

Is there a cumulative map that shows where early succession habitat was created by natural forces, especially since the 1993 plan was implemented?

If yes, could be put them online? If not, would not it be important to begin this mapping for aid in future planning?

*Response: In the "Key Documents" on the web are links to District maps that display prescribed burning and timber harvest completed since 1993. We do not have maps of wildfires or of early successional habitat created by natural disturbances*

I went to the "Key Documents" section of the website and clicked on the District maps that you claimed display burning and timber harvest completed since 1993. The first three District maps did not contain such information and I did not waste more of my time checking the others. Please send me the maps that contain the information or put them on the website and verify that this has been done, and then notify me.

*RESPONSE: The website links were fixed on 8/29/11.*

65. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**38. (July 24)** In my July email, I asked:

*Would you be so kind as to explain in some detail where in the draft GWNF plan the monitoring elements that are required under the 1982 regulations implementing NFMA are written out?*

*This was not addressed in your response of July 15. Perhaps my question did not stand out sufficiently to merit attention. Would it help if I emphasized the importance of receiving an answer to my question by "shouting" it in capital letters? Let's see if this helps:*

**WOULD YOU BE SO KIND AS TO EXPLAIN IN SOME DETAIL WHERE IN THE DRAFT GWNF PLAN THE MONITORING ELEMENTS THAT ARE REQUIRED UNDER THE 1983 REGULATIONS IMPLEMENTING NFMA ARE WRITTEN OUT?**

*Response: Monitoring is described in Chapter 5 and Appendix H of the Draft Forest Plan. There is no more detail currently available. Your comments on the monitoring needs will be reviewed and responded to in the Final EIS.*

Your response does not answer the question I asked. Stonewalling won't work. Please answer the question.

*RESPONSE: See response to question 73.*

66. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**37. (July 24)** In the Frequently Asked Questions, the question is asked:

5. Why does the Draft Plan maintain the same level of timber harvest, when recent budgets have not funded the levels in the current plan?

Of course this is question based on a false premise and misleads the public. The level of timber harvesting in the draft plan **increases** over the timber harvesting level in the 1993 (current) plan. What accounts for this misstatement, and why has it not been corrected?

*Response: As described in the response to question 28, an error was made in describing the level of regeneration harvest in the current plan. It is corrected in the Errata.*

You still have not corrected the erroneous statement in the FAQ. I checked. It's still wrong. You need to correct it.

*RESPONSE: We corrected this FAQ on September 7.*

67. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**36. (July 24)** Reading further in the Transportation Analysis Process (TAP) report and the spreadsheets, I don't see how this process is used to develop the estimated road network needed to implement each of the alternatives outlined in the EIS. The TAP recommendations appear to stand as an independent analysis rather than an analysis that is used to calculate how many miles of roads are needed for each alternative. The TAP identification of 158 miles of roads that should be decommissioned is developed independent of analysis of any alternative. It seems to me that alternative C, which has no timber program, would decommission far more roads (which are not needed for timber harvesting) than the preferred alternative, which is maintaining a timber base of 439,000 acres. Yet, both call for decommissioning 160 miles of road. Alternative C does call for the decommissioning of additional roads located in roadless areas that are recommended for Wilderness. However, roads that are located in roadless areas are not servicing areas that are part of the timber base, so the call for decommissioning of roads in roadless areas is not connected to any consideration of a road system needed to access timber. However, maybe I missed something. Was there a discussion in the TAP documents about the road system needed for each alternative? Was there some analysis other than TAP that led to the figures for a road network needed to implement each alternative outlined in the EIS?

*Response: Timber management is not the only reason for maintaining the road system on the GWNF. Roads provide access for many users and the need to maintain many of the existing roads was an important issue in the DEIS. There was no discussion in the TAP documents about alternatives. The TAP was based on current conditions and then adjustments were made in the DEIS to reflect the varying levels of road decommissioning by*

*alternative. Alternative C also has an emphasis on dispersed recreation use, for which some of the road network is still needed for access.*

Your response does not address my questions about the inadequacy of TAP to plan a road system needed for the needs of each alternative. As I pointed out, TAP called for the decommissioning of 158 miles of road independent of the transportation need of each alternative. There was an independent calculation of the number of miles of road that would be decommissioned if the wilderness recommendations specific to each alternative were implemented, but there was no other attempt to tailor the road system for alternatives. As I pointed out, Alternative C has no timber program, and the roads that are used administratively for timber purposes could be dropped from the system in this alternative. Your statement that Alternative C has an emphasis on dispersed recreation that would require maintaining roads designed for timber use is not supported by the description of Alternative C in chapter 2 of the draft EIS.

#### *RECREATION*

*Three existing ATV/OHV use areas; drop planned Archer Run area*

*Increase in trails for non-motorized users but no net increase in maintenance (by relocating or decommissioning unsustainable trails)*

*No management of roads for OHV use*

*No new developed recreation sites, closure of some sites*

*Maintain inventoried semi-primitive acres and move towards a primitive ROS setting in Shenandoah Mountain area*

You need to include alternative-specific road planning in the supplemental draft.

*RESPONSE: We will consider this as we move through the review of all of the public comments and identify any needs for modification to the documents.*

68. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**33. (July 23)** I asked on June 19:

3. In Table C 8.3, which displays the maintenance level of the roads, the "No Action" alternative (A), has a higher total road maintenance mileage (1852 miles) than the total miles of roads in the current system (1823 miles). How can that be?

You answered on July 15:

*Response: The higher total mileage of roads is due to the fact that an estimated 29 miles of road would be constructed during the first decade under Alternative 1.*

The 1993 Plan (the no action alternative) actually says:

*The amount of road construction needed to accomplish the timber management and wildlife habitat needs on suitable acres in the Revised Plan is estimated to be*

*5 to 8 miles of system roads every year during the 10 to 15 year period*

*that the Revised Plan is in effect. This does not include reconstruction or*

*maintenance of existing roads. Additional roads may be needed for a variety of*

*reasons including access to new developed recreation sites, general forest*

*access, and access to wildlife improvements. (p. 2-19)*

Would you like to guess again?

*Response: The road figures in the 1993 were based on estimates of road needs to accomplish the timber and wildlife management programs in the plan. Our current estimates of the road needs to meet the 1993 timber and wildlife management programs are lower.*

I had followed up with a question on August 18, but I have not received an answer. I reiterate the need for an answer.

*RESPONSE: See answer to question 52.*

69. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**32. (July 23)** Continuing my review of the answer you provided on July 15 to my May 28 question about the lack of budget information in the draft Plan and EIS:

As I noted in my email question (31), the budget figures you provided are partial in the line item categories covered. The budget figures you provided appear far too low to disclose how much money would be required to actually implement the various alternatives.

First, once you disclose the budgets actually used to manage the GW since 1993 are disclosed, it will be possible to compare historical real-dollar costs with the costs estimated to implement various alternatives proposed. The historical data should be adjusted with Consumer Price Index factors to reflect current dollars so we are comparing apples to apples.

Second, it is possible to check the reality of the budget estimates for alternative A, which supposedly models the 1993 Plan. The EIS for the 1993 Plan discloses that the budget needed to implement the plan activities is \$15.2 million. (See graph 2-47 on page 2-82 of the EIS) When adjusted to current dollars using price indexing, this is slightly over \$22 million, according to my calculations. In the draft EIS, the budget estimated to implement alternative A (the 1993 Plan) is \$11,262,000. I would appreciate you double checking my figures, but my figures show that the budget you are proposing to implement the 1993 Plan is only half of what they calculated in 1993. I suggest going back in the process records for the 1993 Plan/EIS to see how they arrived at their figures and compare it with how you arrived at the figures you sent to me. Without reliable budget figures, it is impossible to do realistic PNV or Implan calculations, or provide a baseline against which future budgets can be compared as required in the 1982 regs pertaining to monitoring.

*Response: We re-estimated the budget used for Alt A and adjusted costs to better reflect the intent of Alternative A. The estimate for timber roads was not included in future projections since we do not fund timber roads any longer. Costs associated with timber roads are now reflected in the historical revenues for timber.*

The recalculation of the costs associated with Alternative A is still not adequate. The spreadsheet which Ken sent on August 8 showed the original FORPLAN line items (totaling \$14,153,200) and the inflation-adjusted figures in 2009 dollars (totaling \$20,522,140). I had used the figure \$15.2 million for the cost of implementing the plan because it was shown in a graph on page 2-82 in the EIS.

However, Appendix F of the 1993 Plan contains a detailed line item budget for implementing the Plan, and it totals \$17,661,100. Why is this information not used as the starting point for calculating an

inflation-adjusted (in 2009 dollars) budget for Alternative A? According to my rough calculations, this would approximate \$25.6 million in 2009 dollars.

What was the source for the line items shown in the August 8 spread sheet, since they do not approximate the Appendix F figures?

Your response says you did not include the costs associated with timber roads because you do not fund timber roads any longer because they are reflected in the historical revenues for timber. Do I interpret this correctly to mean that purchaser credit is not included in the budget but is reflected in lower revenues for timber contracts? If this is a correct interpretation, the line item for "Forest Road Purchaser Construction" in the Appendix F budget totals \$156,000 would not be included in the current budget for Alternative A. Is that correct?

The conclusion is that the costs shown in the budget for Alternative A in the table included in the response to my question #4 are much too low and must be recalculated. It would also cast doubt on the reliability of the line item costs associated with other alternatives, especially where the outputs are not significantly different from those in Alternative A.

*RESPONSE: The budget in Appendix F does not coincide with the budget figures used in the 1993 FEIS (and FORPLAN analysis). We used the figures from the EIS. Your comment on purchaser roads is correct; as previously noted we used the EIS budget figures.*

70. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**31. ( July 23)** I was reviewing further the preliminary answers you sent on July 15 to questions I had emailed over the last six weeks. As I noted in my email on May 28, the draft Plan and EIS documents contain no budgets that project how much money it would take to implement each of the alternatives, including alternative G which was the basis for the Plan. In your July 15 answer, you included some figures that you call program budgets that you used in developing PNV and Implan calculations.

First, these figures are incomplete. They do not include many of the budget line items needed to fund operation of the GWNF, as shown for the combined GW and JNF in appendix E in the AMS. Have you prepared planning budgets for all the alternatives that include all line items?

Second, the amended and full budget figures should be included in the planning documents. While responding to my request for budget figures by sending them to me is appreciated, you did not make any effort to include any budget figures in the errata you were drafting. Full and accurate figures need to be disclosed to the public. Do you intend to include full budget figures in the final version of errata version 3?

Third, as I read the 1982 planning regulations, you need to include full budget figures for the plan so that the annual budgets can be compared to the base plan budget to see how these costs compare. If this is not your interpretation of the planning regulation language, what is your interpretation?

*Response: See Response to previous question.*

See my analysis in Question (69) which suggests the budget figures which you provided as a response to my questions about the cost of implementing the 1993 Plan (Alternative A) and other alternatives are much too low.

Please note that the budget figures for implementing the 1993 Plan were included in an appendix to the Plan. A budget to implement the GWNF Plan now under development should be outlined in an appendix to the current planning documents. You have stated that the budget figures used in developing the PNV analyses and Spectrum modeling would be included in under "Key Documents". This has not been done, but that is not the place for this important information. It needs to be fully developed and included in the Plan. Note my third question, which refers to the 1982 planning regulation requirements for budget information needed for monitoring.

*RESPONSE: We will consider this as we move through the review of all of the public comments and identify any needs for modification to the documents.*

71. (August 21) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**xx. (July 22)** In my question of May 28 about budgets, I asked:

I also did not see any display of the budgets associated with management of the GWNF over the life of the current (1993) Plan. Are these figures available? If so, would you please send them?

In your response of July 15, you said:

*Response: Historical budgets since 1993 are included in Appendix E – Budgets and Accomplishment History in the Analysis of the Management Situation.*

The budget information in Appendix E of the AMS is for the combined GWNF and JNF. This is not helpful in a discussion about the GW plan, and not what I asked for. There certainly should be figures for the GW before it was combined with the JNF, and you can use an appropriate methodology of your choice to come up with budget figures for the GW portion of the combined forests since then. This is what should be included in the planning documents, is it not?

*Response: A table displaying the budget information used in the DEIS analysis will be added to the website under the "Key Documents."*

As noted in my comments and question, there is a need for breaking out the GWNF portion of the combined GWNF/JNF budget figures shown in Appendix E of the AMS. The table which you refer to has not been added to the "Key Documents" section of the website, so there is no way to know if you have addressed my concern. However, can you tell me what procedure you use to calculate the GWNF portion of the combined budget when determining costs based on historic data?

*RESPONSE: The historic budget information has been separated by national forest. The actual budgets for the GWNF and JNF were separate for FY 94 and FY 95. With the Forests administratively combined, it is*

not possible to clearly distinguish costs attributed to just one Forest. For the analysis, the budget is split in half for each Forest for FY 96 through FY 2009.

72. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**30. (July 22)** In reviewing the draft errata version 3, I reviewed table B2.11, shown below.

**Table B2.11 Projected Habitat components in acres and percentage of forested landscape at 10 years by alternative.**

**\*Alternative A includes both early successional habitat created through natural disturbances and through timber harvest. Alternative C includes only early successional habitat created through natural disturbances. Alternatives B, D, E, F, and G only display early successional habitat created through timber harvest.**

Please correct me if I have misinterpreted your table, but it seems to me you are saying that natural forces create an average of 1,888 acres per year, or 18,888 per decade, as shown in alternative C. As you noted, alternative C has no timber program, and the 18,888 acres of early successional habitat are created through natural disturbance. You also state in your footnote that in alternative A, the decade total of early successional habitat of 46,829 is a combination of timber harvesting and natural disturbance. You do not break out what portion of the 46,829 is attributable to natural disturbance, but is it not reasonable to assume that the forces of nature would create the same amount of early successional habitat that you report in alternative C? Your footnote says that alternatives B, D, E, F, and G, include only early successional habitat created through timber harvesting. Is it not reasonable to assume that the forces of nature will also create approximately 18,888 acres of early successional habitat no matter under which alternative the GWNF is managed? Perhaps I missed it, but I don't recall a discussion in the EIS about the contribution of natural forces to creating early successional habitat. Please direct me to the discussion in the EIS if I missed it. From the (draft revised) table you have presented, it appears you are saying that there is just as much early successional habitat created under alternative C, which has no timber harvesting, as in alternative F. In either case, you get 2% of the forest in early successional habitat. This is counterintuitive, but perhaps you have some rational explanation.

*Response: This table has been redone to better display the information. It more clearly describes that the table displays both timber regeneration harvest and natural disturbances in the early successional habitat. The same level of early successional habitat from natural disturbances (16,888 acres) is expected under all the alternatives.*

I had written a follow up on August 18 asking for the derivation of the 16,888 acres that you claim is created through natural disturbances. I have not received an answer, and this information is critical to developing comments on the draft documents. Please respond.

I am skeptical that the 1,688.8 acres of early successional habitat per year adequately reflects the effects of gypsy moth defoliation on killing trees, resulting in sunlight to the forest floor and stimulating early successional growth. I see thousands of acres of trees in the JNF near Paint Bank that have

been killed by successive defoliation from gypsy moth, and there are many areas of the GWNF where wave after wave of defoliation has resulted in early successional growth. Look at the map displaying successive gypsy moth defoliation on the GWNF in your "Key Documents" section of your website. Large swaths of the GWNF have been hammered by four, five, six, seven, eight, nine, ten, or eleven infestations of gypsy moths. Have you monitored or evaluated how much tree mortality has taken place in these areas? If you have such information, please send it to me.

*RESPONSE: We do not have that information.*

73. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written, in part:

**27. (July 08)** I have read chapter 5 on monitoring in the draft GWNF plan. The paragraph that caught my attention is on page 5-3:

*The Monitoring and Evaluation Framework is part of the Forest Plan and is stated in terms that will direct what will be monitored, but are not so specific as to address how monitoring will be accomplished. The Monitoring and Evaluation Framework will be further refined during Forest Plan implementation into Monitoring Elements and Task Sheets, which are more detailed, specific and measurable than the monitoring questions themselves. Monitoring Elements and Task Sheets may be modified and prioritized to guide monitoring activities over the course of Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet (Appendix H) indicate the nature of Monitoring Elements and monitoring details that are to be further developed during Forest Plan implementation. The Monitoring Summary Table and sample Task Sheet are presented here only for information and may be modified as needed to address changes in needs, priorities, availability of personnel and funding.*

On first reading, this appears to conflict with the requirements for monitoring established in the 1982 planning regulations, under which the GWNF is being prepared.

*(k) Monitoring and evaluation. At intervals established in the plan, implementation shall be evaluated on a sample basis to determine how well objectives have been met and how closely management standards and guidelines have been applied. Based upon this evaluation, the interdisciplinary team shall recommend to the Forest Supervisor such changes in management direction, revisions, or amendments to the forest plan as are deemed necessary. Monitoring requirements identified in the forest plan shall provide for--*

*(1) A quantitative estimate of performance comparing outputs and services with those projected by the forest plan;*

*(2) Documentation of the measured prescriptions and effects, including significant changes in productivity of the land; and*

*(3) Documentation of costs associated with carrying out the planned management prescriptions as compared with costs estimated in the forest plan.*

*(4) A description of the following monitoring activities:*

*(i) The actions, effects, or resources to be measured, and the frequency of measurements;*

*(ii) Expected precision and reliability of the monitoring process; and*

*(iii) The time when evaluation will be reported.*

*(5) A determination of compliance with the following standards:*

*(i) Lands are adequately restocked as specified in the forest plan;*

*(ii) Lands identified as not suited for timber production are examined at least every 10 years to determine if they have become suited; and that, if determined suited, such lands are returned to timber production;*

*(iii) Maximum size limits for harvest areas are evaluated to determine whether such size limits should be continued; and*

*(iv) Destructive insects and disease organisms do not increase to potentially damaging levels following management activities.*

Would you be so kind as to explain in some detail where in the draft GWNF plan the monitoring elements that are required under the 1982 regulations implementing NFMA are written out?

*Response: ...Your comments on the monitoring needs will be reviewed and responded to in the Final EIS.*

I wrote a question, not a comment. Your response does not address my question, which I think is quite simple. Please answer the question.

*RESPONSE: Requirements for Section (k)(1) are addressed in Appendix H tasks 1-44; for Section (k)(2) in Appendix H tasks 1, 2, 7, 8, 9, 10, 11, 12, 13, 14, 37, 38, 39, and 40; for Section (k)(3) in Appendix H task 46; for Section (k)(4) throughout Appendix H; for Section (k)(5)(i) in Appendix H task 47; for Section (k)(5)(ii) in Appendix H task 48; for Section (k)(5)(iii) in Appendix H task 49, and for Section (k)(5)(iv) in Appendix H task 15.*

74. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**26. (July 6)** You state on page 2-6 of the draft EIS:

**ALTERNATIVE B**

*This alternative is based on changes to the current plan identified in the Analysis of the Management Situation. The analysis was based on an IDT evaluation of the 1993 Forest Plan direction, monitoring and evaluation results, new policies, best available science and an attempt to balance public issues that were identified as of March 2010.*

The suitable base in alternative B is 476,000 and the acres to be harvested annually range from 1,800 to 3,000. (draft EIS, p. 2-6).

However, in reviewing the Analysis of Management Situation document shown on the GWNF website, and the CER report on which the AMS was based, the suitability review recommends maintaining a suitable base between 350,000 and 370,000 acres.

*Tentative Options or Proposed Actions for Change*

*C-1. a) Strive to maintain at least the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres so as to maintain some capability to meet wildlife habitat, forest health, and the economic status of local community needs. (AMS, p. 115)*

Upon what documentation are you basing claim that the suitable base of 476,000 acres for alternative B is based on the AMS? Is there any other documentation not connected with the AMS on which you are basing your claim?

*Response: As quoted, the AMS recommended striving to maintain AT LEAST the existing amount of forest suitable for timber production or suitable for timber harvest between 350,000 to 370,000 acres. The 476,000 acres of forest suitable for timber production is greater than the range of 350,000 to 370,000 acres and so meets the goal of at least matching that level. After the discussion of the acreage, the AMS recommendation goes on to state:*

*b) Identify all of those NFS lands currently within MA 17 (Timber Production) but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Production.*

*c) Identify all of those NFS lands currently within other MA's but outside of any other special areas and otherwise consistent with timber suitability requirements as Suitable for Timber Harvest*

*The identification of these areas helped to add to the suitable base of 476,000 acres.*

To assuage any concerns that the jump from 350,000-370,000 acres in the AMS to 476,000 in alternative B in the draft plan was arbitrary and capricious, please send me the process records in which the calculations were done to identify lands in b) and c) noted in your response.

*RESPONSE: The calculations will be sent.*

75. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**25. (July 5)** On page 3-262 of the draft EIS, the ASQ for the "no action" alternative (A) does not vary by decade.

Table C6.8 Allowable Sale Quantity for All Products by Decade (MMCF)

Alternative	Decade 1	Decade 2	Decade 3	Decade 4	Decade 5
A*	47	47	47	47	47
B	54.3	55.4	60.9	63.3	67.5
C	0	0	0	0	0
D	91.8	91.8	101.0	101.6	111.7
E	31.1	33.0	36.3	39.9	40.4
F	20.4	20.4	21.6	23.8	25.0
G	54.3	55.4	60.9	63.3	67.5

Why have you held the volume constant for the 1993 plan? The 1993 plan did increase volume by decade. Exactly how the 1993 volumes are to be converted to the 2011 conversion rate between cubic feet and board feet is problematic, but the methodology used should be transparent. To show no increase in volume for decades 2-5 for the no action alternative skews the present net value analyses.

*Response: We were unable to locate any estimates in the 1993 Forest Plan or FEIS or administrative process record that indicated how the ASQ would increase for decades 2-5.*

Can you place all the administrative process records in the "Loesel" Document Room so they can be examined by the public?

*RESPONSE: It would not be practical to move all of the records to another room. The records are available for review. We have a summary of the process records for the 1993 Forest Plan and EIS which can be used to identify specific documents.*

76. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**23. (July 5)** I am still looking for maps that display the adopted ROS classes for each alternative. The standards for the preferred alternative (draft plan p. 4-18) make reference to a map of adopted ROS classes

*FW-160: FW-161: New structures and facilities are constructed and maintained to meet the adopted ROS class for the area.*

*FW-162: Recreation opportunity maps will govern all new projects, including special uses. Existing conditions may not meet the assigned ROS classes.*

Where are the maps?

*Response: See the answer to Questions 3 and 19. The standards FW-161 and FW-162 were brought forward from the Jefferson Plan by mistake since they do refer to adopted ROS and that concept is not used in this Draft Plan. This is covered in the Errata.*

Why have you decided to abandon the approach used in the current GWNF Plan and the JNF Plan and instead adopt a radically different approach? Is there any documentary evidence that the approach in the current GW Plan or the JNF Plan is not working?

*RESPONSE: There is no documentary evidence that the approach in the current GW plan or JNF plan is not working. However, the AMS includes a discussion of the change in the approach on pages 161 to 165. The amounts of SPM and SPNM on the JNF are more limited than on the GWNF. The JNF Plan provides an additional ROS category that prohibits permanent road construction to buffer SPM and SPNM areas against boundary creep. The amounts of SPM and SPNM on the GWNF are larger and better insulated from boundary creep. By mapping the Rx 13 areas close to existing access on the GWNF and having a new permanent road objective so small, it was felt that there is no need to use adopted ROS settings any longer on the GWNF.*

77. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**22. (July 5)** Your first objective for timber (on page 3-23 of the draft Plan) states:

*OBJ TIM-1: A total timber sale program quantity (TSPQ) of 3.8 to 5.4 million cubic feet (MMCF) [19 to 27 million board feet (MMBF)] is provided annually from lands suitable for timber production. This equates to about 1,800 to 3,000 acres per year. The maximum Allowable Sale Quantity (ASQ) for the first decade is 54.3 MMCF.*

In Appendix C of the draft Plan, Table C-3, on page C-4, shows:

<i>Total Allowable Sale Quantity</i>	<i>54.3 MMCF</i>
<i>Total Non-Scheduled Volume</i>	<i>0 MMCF</i>
<i>Total Timber Sale Program Quantity</i>	<i>54.3 MMCF</i>

Since there is no amount shown for non-scheduled volume, the allowable timber sale quantity (ASQ) is equal to the timber sale program quantity (TSPQ). Is it therefore correct that the variable timber sale quantity program in OBJ TIM 1 of 3.8 to 5.4 million cubic feet is also a allowable sale quantity of 3.8 to 5.4 MMCF annually?

*Response: No, the ASQ is a ceiling for the volume of timber harvested on a decadal basis and therefore would not be expressed as a range.*

My argument, which you have not addressed, shows that it cannot be a Total Timber Sale Program Quantity and you have stated that it cannot be an ASQ figure. So what is the 3.8 MMCF figure to be called?

*RESPONSE: We do not follow your argument. The total timber sale program quantity is projected to be a range from 3.8 to 5.4 million cubic feet. The 3.8 million cubic feet is called the lower end of the range.*

78. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**21. (June 23) When is the next IDT meeting open to the public?**

*Response: Replied in e-mail 6/28/11 that there will be no IDT meetings until after the 90 day comment period ends on October 1, 2011 and nothing has been scheduled yet.*

I believe the comment period was originally set to end on September 1, but it may have been extended to October 17.

Please notify me immediately when the next IDT meeting has been scheduled, and reserve at least 30 minutes during that meeting for a presentation from me. Could you please send me a copy of the agenda and when my presentation is scheduled?

*RESPONSE: We will notify you of the next IDT meeting.*

79. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**20. (June 21) In reviewing Table C12.19 Cumulative Decadal Present Net Values of Benefits and Costs (millions of dollars, 4% discount rate cumulative to midpoint of 5th decade), on page 3-297 of the draft EIS, it struck me that all the present value costs by program and all the present value benefits by programs are expressed as a single value for each of the programs for each of the alternatives. However, the many of the objectives for the alternatives show a numerical range of activities. For example, the preferred alternative says that timber harvesting may range between 1800 acres and 3000 acres per year and that the prescribed burning program may range between 12,000 acres and 20,000 acres per year. It seems only reasonable to expect that the costs and the values from these activities would vary greatly depending on what level actually takes place, and therefore the PNV calculations would show a range of costs or benefits for each program instead of a single value. Could you explain or provide a process paper on how you arrive at a single number expressing the costs and the benefits over a five decade period when there may be a wide range of program activities on a yearly basis?**

*Response: The benefits and costs associated with the timber outputs were calculated using the Spectrum estimates, which are based on the level of acres harvested shown in Table 2-17, with the*

*corrected typos identified through the Errata. The costs associated with the fire program reflect the upper end of the range for each alternative, as clarified in the Errata.*

Your response does not address the basis for my question. If you select the high end of the range for analysis, what about the low end? How does that get analyzed? Why prefer one number over another, when you are attempting to make anything within the range equally acceptable?

*RESPONSE: The analysis identifies the specific number used in each of the calculations. There are a range of alternatives and so a range of costs and benefits are displayed that can be used to compare alternatives.*

80. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**19. (June 21)** Could you help me understand how ROS settings are guiding the planning of dispersed recreation in the draft GWNF plan/EIS? Alternative A, the "No Action" alternative, has a specific number of acres in six ROS classes, as described in Table 2-11, on page 2-40 of the 1993 Plan,

ROS Class (Thousands of Acres)

Rural	2
Roaded Modified	86
Roaded Natural	613
Semi-primitive Motorized- 1	104
Semi-primitive Motorized-2	104
Semi-Primitive Non-Motorized	150

There is also a map in the planning records for the 1993 GW Plan that shows where these acres are to be allocated on the ground. There are also maps for the 2004 JNF Plan that show where the ROS class acres are allocated on the ground.

However, I did not see any maps that show where the ROS classes are allocated on the ground for alternatives B through G in the current revision documents. Did you prepare such maps? If not, how is the public to evaluate the adequacy of the various alternatives in making ROS allocations expressed in Objectives? (It would be particularly helpful to have ROS maps that also show roads that are candidates for decommissioning so the public could evaluate the relationship of decommissioning and proposed SPNM areas.)

FYI, I attempted to open the map of the GWNF existing ROS inventory (February 2010) that is listed in key documents section on the web site. The link appears to be broken, and it would not open.

*Response: ROS classes were not allocated on the ground in Alternatives B through G. The ROS inventory was used to allocate other management prescriptions, some of the prescriptions have direction that will assure that the inventoried ROS class remains and others allow activities that could alter the ROS from the current inventory.*

I understand that you have not allocated ROS classes on the ground in Alternatives B through G, making this a departure from the way ROS classes were mapped in the current GWNF Plan and the current JNF Plan. Why then do you assign numbers to ROS acreage in OBJECTIVES for Alternatives B through G? The process you are proposing uses ROS as a running total--ever changing--merely the result of decisions made in specific timber sale documents to build additional roads. ROS merely keeps track of the numbers; ROS does not guide anything

*RESPONSE: ROS was used to assist in making land allocation decisions in the alternatives. The objectives set sideboards on the range of opportunities we expect to provide.*

81. (August 22) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**18. (June 21)** In analyzing developed recreation capacity, the draft EIS uses the measure of "Person at One Time" (PAOT). In Table C1.11 *Estimated Capacity (PAOTs) of Developed Recreation Areas by Alternative* on page 3-210, it is claimed that the "No Action" alternative (A) has a PAOT of 10,210. However, the 1993 GWNF Plan, which is supposed to be represented in alternative A, actually shows a PAOT of 16,200. See page 2-85 of the 1993 GWNF EIS. Do you agree that a correction needs to be made in the draft documents to reflect the correct figures for alternative A?

According to the 1993 EIS, the capacity **existing** in 1993 was 13,820 PAOT. See page 3-7 of the 1993 GWNF EIS. The PAOT capacity of 16,200 in the 1993 Plan was the result of substantial construction of new facilities.

In the preferred alternative for the new GWNF plan, the Forest Service is proposing a substantial reduction in developed recreation capacity. The POAT capacity in the preferred alternative (G) is only 10,720. See page 3-210 in the draft EIS. However, there is no explanation or analysis of this substantial reduction from capacity that existed in 1993. Do you agree that the Forest Service is proposing a substantial reduction in developed recreation capacity? Do you agree that the planning documents should include an analysis of where these reductions are taking place and the rationale for the reductions?

*Response: Table C1.11 is corrected in the Errata. The current capacity of about 10,225 PAOT displayed in the Errata differs from the existing capacity displayed in the 1993 Plan (about 13,000 PAOT). This difference is due to: 1) the 1993 figures include PAOT (2,608 PAOT) that are now displayed in the DEIS in Table C1.7 as Developed Access Points for Dispersed Recreation; 2) PAOT were calculated differently for some sites in 1993 and have been updated in our current database; and 3) a few sites have been decommissioned. Rather than proposing a substantial reduction in*

*capacity, Alternative G reflects the current status, but without the planned additional construction in Alternative A.*

In the draft :Plan, you say about developed recreation:

*However, based on our current agency capacity, development of new facilities is not anticipated and some less-frequently used sites could be closed in the future. Over the next few years, our focus will be on reducing facility maintenance backlogs and aligning facilities and services with demand and our capability to manage it. A key part of this strategy will be to seek long-term funding and establish additional partnerships as a way to add desired facilities in the future to meet increasing recreation demands. (draft Plan, p. 3-17)*

Do I read this correctly to mean that you may close some sites or you may add desired facilities, contrary to your claim that Alternative G is simply going to maintain the status quo regarding developed recreation?

*RESPONSE: The draft plan language describes the intent of the Plan.*

82. (August 23) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**17. (June 19)** The draft Plan contains the following statements:

***OBJ REC-7: Maintain a total of at least 244 miles of open or seasonally open roads as high clearance roads to meet Off-Highway Vehicle user needs.***

***The mileage of roads maintained for high clearance vehicles (OHV) is estimated to be about 1,030 miles across the Forest, near current levels.***

***OBJ RDS-3: Maintain to standard a minimum of 75 miles of passenger car roads (OML 3-5) and a minimum of 105 miles of high clearance vehicle (OML 1-2) roads on an annual basis.***

***Could you please clarify how many miles of roads are maintained suitable for high clearance vehicle use?***

*Response: It is estimated that about 1,030 miles of road will be maintained at maintenance level 2 which is designed for high clearance vehicles. There is an objective to assure that at least 244 miles of these high clearance roads will be open, at least seasonally to meet the needs of OHV users. The third item refers to annual road maintenance activities as opposed to a total number of roads available for use at a specified maintenance level. The word 'maintain' with these three statements*

*will be changed in the Final Plan to distinguish between road maintenance and the desire to keep something at a minimum level.*

If you only maintain 105 miles per year to high clearance standards, it will take approximately 10 years to maintain the 1030 miles of roads in the OML 1-2 inventory only once. There are many roads that will be impassible if they are "maintained" only once in 10 years.

- 1, How often do you maintain them now?
2. How many of these are closed?
3. How many of them are open?

You have proposed to eliminate the identification in the plan of roads suitable for OHV users.

1. What is your rationale for removing this information from a group of Forest users?
2. Do you propose to notify OHV users of the location of the 244 or more miles of roads which are available for OHV users?
- 3, If so, how?

*RESPONSE: The occurrence of maintenance varies by road conditions, weather, type of maintenance activity and other factors. Generally roads are maintained once every one to three years. About 298 miles of the maintenance level 2 roads are open or seasonally open, the rest are only open for administrative use. We now produce Motor Vehicle Use Maps that display roads that are open or seasonally open for motor vehicle use.*

83. (August 23) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

1. In the 1993 GWNF Plan, the total mileage of Forest Highways in Virginia and West Virginia was 797 miles. The draft EIS says that the current mileage of Forest Highways in Virginia and West Virginia is 804 miles. If only 7 miles of road maintenance was transferred from the responsibility of the GW to the two states over the last 18 years, what reason is there to assume that 107 miles will be transferred to maintenance by the States over the life of this plan, especially in light of the budget squeeze on state transportation budgets for the foreseeable future?

*Response: The DEIS states on page 3-272 " It is anticipated that at least a portion of the 107 miles of road will be upgraded and converted to a Forest Highway within the current Plan period." The Forest will work towards this goal.*

You have many noble goals. Very few of them are achieved.

1. What happens when the noble goal of shedding the responsibility of maintaining these 107 miles of roads is not achieved?
2. In the plan, how are you accounting for the cost of maintaining these roads until they are transferred to the states?

3. You also eliminate from the minimum road system the roads that service special uses. To whom would this responsibility be transferred?
4. How many miles of special use roads have you transferred to the special use entity during the life of the current plan?
5. How are you accounting for the cost of maintaining these roads in the plan until the responsibility of maintaining them is transferred to some other entity?

*RESPONSE: If the forest highway goal is not met, the roads will continue to be maintained under our current budget, funds will be shifted from other roads to accomplish this. The responsibility for maintaining special use roads will be the responsibility of the special use permittee. A number of the special use roads are generally maintained by the permittees, but none currently have agreements that require this. Until this responsibility is transferred the maintenance costs are included with the rest of the roads.*

84. (August 23) I am continuing my review of the "answers" you sent to me on August 16, which purport to respond to 42 question sets I emailed to you from May 21 to July 27.

I had written:

**6. (May 28)** I was reading your write up in the draft Plan and EIS about roads, and I can't make out what you have in mind for road management. I guess I'm an old fashioned guy who needs a table for the number of miles of open, seasonally open, and closed miles of road for each alternative. I didn't see such a table, but maybe you can point one out, or send me the figures.

*Response: Currently about 230 miles are closed, 642 are for administrative use, 367 are open seasonally and about 574 are open. Tables comparing these categories for each alternative were not prepared for the DEIS.*

Why not show by alternative the varying numbers of roads that would be closed, open seasonally, open, or for administrative use?

*RESPONSE: We did not see a need to express the data in this form, we will consider this in the final EIS.*

85. (August 25 ) How do you turn this:

- The objective for prescribed burning would increase from 3,000 acres per year to a range of 12,000 to 20,000 acres per year.
- The objective for timber harvest would change from 3,000 acres per year to a range of 1,800 to 3,000 acres per year.  
Into this?
  - The objective for prescribed burning would increase from **2,400** acres per year to a range of 12,000 to 20,000 acres per year.
  - The objective for timber harvest would change from 3,000 acres per year to a range of 1,800 to 3,000 acres per year.

ANSWER: What is Errata?

*RESPONSE: We fixed the error on September 7.*

86. (August 28) Would either or both of you be available for a meeting during the afternoon of Wednesday, Thursday, or Friday to work out a plan for the production of materials I need for adequate comments on the draft plan/EIS? Please let me know ASAP so I can arrange my schedule as well.

*RESPONSE: We met on Sept 7.*

86 Duplicate. (Sept 4) Your website still shows that you plan to release the final Plan and EIS in January, 2012. With the extension of the comment period, do you plan to change the projected date for release of the final documents? If so, what date do you now project?

*RESPONSE: We now estimate the final documents will be completed around March, but we are still evaluating this.*

87. Skipped Number?

88. (Sept 4) At the first IDT meeting at the initiation of revision of the GWNF plan under the 1982 regs, Karen said that you had been told that funding for the revision would be time limited, i.e. you would not be funded if you did not complete the plan within the prescribed time. Is there still a time frame for funding of the revision? If so, what is the current time frame? Has it been extended due to a change in the comments/questions received and the need to do additional analyses?

*RESPONSE: We have not discussed funding with the Regional Office. We believe that we will receive adequate funding to complete the plan in fiscal year 2012.*

89. (Sept 4) In the description of alternatives, the timber volume is expressed in MMBF. Why is the volume not expressed in MMCF, since cubic feet is now the official expression of volume?

*RESPONSE: In most places we tried to use both figures. While MMCF is the official expression, most of our users are more comfortable with the MMBF figure.*

Agriculture Secretary Tom Vilsack

Remarks as Prepared for Delivery

Seattle, Washington - August 14, 2009

Thanks so much for the kind introduction, Congressman Dicks. I want to thank you for your leadership on behalf of America's forests. You have been the most important champion of forests in the House of Representatives on providing the Forest Service funds to fight fires, and on funding stewardship activities on federal, state and private forests.

I also want to acknowledge Lieutenant Governor Brad Owen and appreciate his leadership on environmental issues in Washington State.

It's a pleasure to be here in Washington State, home to 6 of our National Forests and to millions of acres of state, tribal and private forestlands. It is particularly appropriate that we are in the home state of the forest named for the first Chief of the Forest Service, Gifford Pinchot. He gave us a guiding principle still relevant today when he defined conservation as "foresighted utilization, preservation and/or renewal of forests, waters, lands and minerals, for the greatest good of the greatest number for the longest time."

A healthy and prosperous America relies on the health of our natural resources, and particularly our forests. America's forests supply communities with clean and abundant water, shelter wildlife, and help us mitigate and adapt to climate change. Forests help

generate rural wealth through recreation and tourism, through the creation of green jobs, and through the production of wood products and energy. They are a source of cultural heritage for Americans and American Indians alike. And they are a national treasure – requiring all of us to protect and preserve them for future generations.

A new Administration offers an opportunity for a new vision: a vision that will guide both the policies and approach of the US Department of Agriculture and the US Forest Service towards forest conservation and management; a vision to address the challenges we face and make the most of the opportunities to conserve and restore them.

Our National Forests are an enormously important environmental and economic asset. So too are our non-federal forests – state, tribal and private forest lands. The President has made clear his interest in conserving our natural environment. I intend to take that responsibility very seriously and to devote the time and attention it deserves. I also know that Forest Service Chief Tom Tidwell shares that commitment.

I like to call USDA an Every Day, Every Way Department because we do so many things to touch Americans' lives: from helping farmers, to providing affordable housing, to promoting clean energy. As an 'Every Day, Every Way' Department, USDA works to help America's farmers and ranchers produce a sufficient, safe and nutritious food supply for all Americans. But, our farmers and ranchers are also vitally important as stewards of our working lands, in ensuring that in addition to food and fiber, those lands provide clean water and preserve wildlife habitat. Likewise, our forests and our forest

landowners provide more than wood products. Our forests are a source of clean water and a home for wildlife habitat.

Let me give you just one measure, often overlooked, of how important America's farms, ranches and forests are to every American. America's forests, farms and ranches provide 87% of the surface supply of drinking water in America. When Americans turn on a faucet, most don't realize the vital role that our rural lands – and especially our forests – play in ensuring that clean and abundant water flows out of that faucet. So, while some may think it odd that I would give a speech on forests in a major urban area like Seattle, doing so emphasizes an important point. That is, while most Americans live in urban areas, most of us also depend on rural lands, particularly forest lands, for clean water, and a healthy climate.

**For all these reasons, conserving forests isn't a luxury – it's a necessity.** Yet, America's forests are threatened like they've never been before. Climate change, catastrophic fires, disease and pests have all led to declining forest health. We are losing our privately-owned working forestlands to development and fragmentation at an alarming pace. All of these changes have enormous potential impacts on drinking water, greenhouse gas emissions and the climate, local economies, wildlife and recreation. Notwithstanding these trends, we have enormous opportunities. One example, climate change, will create new markets for carbon storage and biomass energy that ought to significantly bolster sustainable forest management and forest restoration.

Unfortunately, the debate around the future of our forests and forest policy has been highly polarized for a long time. I don't need to remind anyone in Washington state about the debates around spotted owls, clearcutting and other forestry issues. But, given the threats that our forests face today, Americans must move away from polarization. We must work towards a shared vision -- a vision that conserves our forests and the vital resources important to our survival while wisely respecting the need for a forest economy that creates jobs and vibrant rural communities.

Our shared vision begins with restoration. Restoration means managing forest lands first and foremost to protect our water resources, while making our forests more resilient to climate change. Forest restoration led by the dedicated people at the Forest Service opens non-traditional markets for climate mitigation and biomass energy while appropriately recognizing the need for more traditional uses of forest resources. Importantly, this vision holds that the Forest Service must not be viewed as an agency concerned only with the fate of our National Forests, but must instead be acknowledged for its work in protecting and maintaining all American forests, including state and private lands. Our shared vision adopts an "all-lands approach," requiring close collaboration with the NRCS and its work on America's private working lands.

## RESTORATION AND COLLABORATION

Why restoration as a driving principle in forest policy? There is no doubt that we are facing a health crisis in our forests. Climate change places them under increasing stress

that exacerbates the threats of fire, disease, and insects. Throughout the west – but in other parts of the country as well -- a legacy of fire suppression has resulted in forests that are over-stocked and much more susceptible to catastrophic fire and disease.

Restoring forest ecosystems, particularly in fire-adapted forests, will make forests more resilient to climate-induced stresses and will ensure that our forests continue to supply abundant, clean water. In many of our forests, restoration will also include efforts to improve or decommission roads, to replace and improve culverts and to rehabilitate streams and wetlands. Restoration will also mean the rehabilitation of declining ecosystems. One example is the Longleaf Pine ecosystem in the South, a forest that has been reduced from 90 million acres to 3 million acres.

Yet, the Forest Service faces a number of barriers in pursuing a restoration agenda. The Forest Service has struggled for years with a budget that has forced management funds to be shifted to fire fighting. We must do better. The Obama Administration is already working with Congress to ensure that the Forest Service has the funds it needs both to fight fires and to manage forests. This is an important issue for our forests, but it also important to the men and women who make up our Forest Service. We must give them the resources they need to succeed.

A second barrier to accomplishing restoration is a history of distrust between environmentalists, the Forest Service and the forestry community. The result has been seemingly countless appeals of forest management activities and subsequent litigation. Certainly, litigation and appeals have served as a useful backstop against misplaced

management decisions. But, given the scale of restoration that must occur, a shared vision built on collaboration will move us beyond the timber wars of the past. Litigation and conflict should become less prevalent because they are viewed as less necessary. Fortunately, that process has begun. In many regions today, the Forest Service charts a path forward by building trust among diverse stakeholders through collaboration and engagement.

A third barrier revolves around a loss of forest infrastructure represented by those who work in the forest industry. In large parts of the west, we've lost timber mills and those who worked in them have left. As a result, we are losing the capacity to perform important kinds of restoration work, from thinning for habitat or watershed function, to reducing hazardous fuels, to removing trees to prevent the spread of insects and disease. Without a robust forest industry that includes both traditional markets and new markets like biomass energy, it will be much more difficult and much, much more expensive to improve the health of our forests.

The Colville National Forest right here in Washington is a terrific example of the sort of collaborative effort that here allows for appropriate forest management while providing timber supply to local mills. The Colville was the first National Forest to engage a diverse group of stakeholders in the most recent revision to their forest plan. Individuals and groups including elected officials, timber interests, motorized recreationists and conservationists got together to discuss common goals for the forest. As a result, general acceptance was reached about where to concentrate future recreation and timber

harvesting. And tens of thousands of additional acres in Colville were recognized for their roadless character and potential for wilderness designation. It is no small testament to this effort and the energies of those involved that Colville has avoided litigation for more than 5 years since this process was initiated.

The experience on the Colville is not unique, but it can still be more broadly applied. If we are to undertake restoration of our National Forests at a scale commensurate with the need, we need more Colvilles.

The Forest Service's forest planning process provides an important venue to integrate forest restoration, climate resilience, watershed protection, wildlife conservation, the need for vibrant local economies, and collaboration into how we manage our National Forests. Our best opportunity to accomplish this is in developing a new forest planning rule for our National Forests. As many of you know, in late June a federal court overturned the 2008 planning rule put forward by the Forest Service – this comes on the heels of a similar court decision overturning the 2005 planning rule. As a result, USDA has decided not to seek further review of the latest court decision overturning the 2008 rule and I have asked Chief Tidwell to develop a new planning rule to ensure management and restoration of our National Forests with a goal to protect our water, climate and wildlife while creating local economic opportunity.

An integral part of our shared vision must be adequate protection of roadless areas. President Obama was quite clear during the campaign in emphasizing his support for

protecting roadless areas. He understands the important role they play in preserving water, climate, and recreational opportunities. Just last week, the 9<sup>th</sup> circuit court of appeals upheld a lower court's decision reinstating the 2001 Clinton Roadless Rule. I view this as a very positive development. Yet, the Forest Service is still subject to a court injunction from a Wyoming District Court Judge in the 10<sup>th</sup> Circuit enjoining the Forest Service from implementing the 2001 rule. We will seek to lift that injunction in light of the 9<sup>th</sup> Circuit decision. If the courts remain conflicted or if it's not possible to protect roadless areas through the courts, we will initiate a new rule-making process to do so. Some states are taking action on their own. Colorado is moving forward with its own roadless rule, as Idaho already has. We believe Idaho's rule is strongly protective of roadless areas. Wisely, Governor Ritter in Colorado has asked for additional public input on his draft roadless plan for Colorado. He understands as I do that Colorado needs strong roadless protections.

## CONSERVING WORKING LANDSCAPES

The threats facing our forests don't recognize property boundaries. So, in developing a shared vision around forests, we must also be willing to look across property boundaries. In other words, we must operate at a landscape-scale by taking an "all-lands approach."

The reality is that 80% of the forest area in the United States is outside of the National Forest System. And many of our National Forests are adjacent to state and private lands;

management decisions both on and of the National Forests have important implications for the forest landscape.

More broadly, privately-owned forests across the country face a daunting set of challenges. The Forest Service estimates that over 40 million acres of private forest could be lost to development and fragmentation over the coming three to four decades. Americans tend to think of deforestation as a problem in tropical countries. Well, I'm here to tell you we have our own deforestation problem right here in the United States and this has enormous implications for the climate, our drinking water, rural economies and wildlife. Just "keeping forests as forests" is a significant challenge on our private working lands.

The good news is that conservation groups, forest industry and government agencies are increasingly uniting to address the common threat of forest loss on private lands. I want the Forest Service and USDA to be partners with these stakeholders in protecting our privately-owned forests. I believe – and I know Chief Tidwell agrees – that the US Forest Service and USDA can play an important role in working with these stakeholders to address forest loss.

Indeed, the Forest Service has a long history in working with private landowners through its partnership with State Foresters and others in addressing the stewardship of privately-owned forests. USDA has other existing strengths in this area as well. The 2008 Farm Bill provides new opportunities to use existing conservation programs and to focus those

resources to the most pressing problems facing family-owned forests. Many of our farm programs and conservation programs have much greater potential than USDA has realized to date to protect, rehabilitate and conserve family forest lands. An important goal of USDA will be to integrate the work of the Forest Service and of our Natural Resources Conservation Service. This is vital if we are to embrace an “all-lands” approach.

Government programs provide only part of what is needed to realize our shared vision. For forest ownership and stewardship to remain viable, it must remain economically rewarding for landowners. Markets for wood will remain important to landowners and local communities. Private and public landowners need access to new markets for both low and high value products and forest uses to underwrite stewardship activities.

Emerging markets for carbon and sustainable bioenergy will provide landowners with expanded economic incentives to maintain and restore forests. The Forest Service must play a significant role in the development of new markets and ensuring their integrity.

Carbon and bioenergy aren't the only new opportunity for landowners. Markets for water can also provide landowners with incentives to restore watersheds and manage forests for clean and abundant water supplies. These markets can also create jobs in rural communities near forests. By generating rural wealth, we can make it possible for landowners to sustain our forests and working landscapes.

I hope we will also examine other policies and approaches outside of USDA and the Forest Service that can address both the management and loss of private forest lands. I know Chief Tidwell and his counterpart Chief Dave White of the Natural Resources Conservation Service will seek out opportunities to work with conservation groups, forest industry, State Foresters and others to ensure we maintain private forests as forests and utilize this “all-lands” approach. The loss of our private working lands deserves constant attention.

## ENGAGING THE AMERICAN PEOPLE

I have offered a broad vision today to guide the Forest Service and the Department of Agriculture in setting a course for America’s forests. I recognize that there is a great deal of work to be done to make it a reality. And so I am tasking the Forest Service and USDA in partnership with all stakeholders to make this vision a reality.

In the short term, I have asked Chief Tidwell to initiate a process to develop new planning rules to guide the management of our National Forests consistent with the vision I have outlined today. Secondly, we will monitor progress towards protection of roadless areas in the courts and will act to protect roadless areas as necessary.

When it comes to restoring forests, I want the Forest Service to improve its existing authorities and to take advantage of new tools to restore all our forests in order to protect our water and to make forests more resilient to climate change. I am asking Chief

Tidwell and Chief White to work together, in partnership with State Foresters, conservation groups, forest industry and others to develop a broad agenda for protecting our privately-owned forests. And, I want the Forest Service and other parts of USDA to play an even more prominent role in developing new markets – carbon, bioenergy and water – as a means to conserve our forests.

The path ahead is challenging but full of opportunity. We must encourage, catalyze and expand the collaborative solutions that hold the most promise to protect our public lands and our working lands. We must dramatically accelerate the scale and pace of forest stewardship activities on both public and private lands. On our National Forests, we must restore more acres more rapidly if we are to prevent catastrophic fires, insect outbreaks and other threats, particularly as climate change makes these threats more potent. On private lands, we also must move quickly to protect forest landscapes before they can no longer function to support watershed health, biodiversity conservation and viable wood markets.

Americans often assume that our health and well-being are separate from the health of the natural world. But, I return again to the simple act that we Americans take for granted everyday: turning on our water faucets. The clean water that emerges is made possible in large part by stewardship of our rural lands, and of our forests in particular. My hope is that together we can foster a greater appreciation for our forests and that all Americans, regardless of where they live, see the quality of their lives and the quality of our forests as inseparable.

## Planning Criteria

*Sec. 219.12 Forest planning--process.*

*c) Planning criteria. Criteria shall be prepared to guide the planning process. Criteria apply to collection and use of inventory data and information, analysis of the management situation, and the design, formulation, and evaluation of alternatives. Criteria designed to achieve the objective of maximizing net public benefits shall be included. Specific criteria may be derived from--*

- (1) Laws, Executive Orders, regulations, and agency policy as set forth in the Forest Service Manual;*
- (2) Goals and objectives in the RPA Program and regional guides;*
- (3) Recommendations and assumptions developed from public issues, management concerns, and resource use and development opportunities;*
- (4) The plans and programs of other Federal agencies, State and local governments, and Indian tribes;*
- (5) Ecological, technical, and economic factors; and*
- (6) The resource integration and management requirements in Secs. 219.13 through 219.27.*

The following are identified as planning criteria to be used in the development of the revised GW Forest Plan. Sections in italics are from the 1982 planning regulations. Other items are additions to the regulations.

### ***Laws***

Alternatives should meet the intent of the Organic Administration Act and Weeks Law identifying the purpose of the National Forest to improve and protect the forest, to secure favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the U.S.

Alternatives should meet the intent of the Multiple-Use Sustained-Yield Act of 1960 to administer the National Forest for outdoor recreation, range, timber, watershed, and wildlife and fish purposes. That these resources are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Alternatives should meet the intent of the Forest and Rangeland Renewable Resources Planning Act of 1974 as amended by the National Forest Management Act of 1976 including requirements to provide for multiple use and sustained yield of the products and services obtained therefrom in accordance with the Multiple-Use Sustained-Yield Act of 1960, and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness.

Alternatives should comply with the Clean Water Act, Endangered Species Act and other applicable laws. Protection of water quality to provide for current and future beneficial uses will be a high priority in all alternatives.

### ***National Direction (formerly RPA Program)***

The goals and objectives of the current Forest Service Strategic Plan will be addressed as applicable to the George Washington National Forest. These include:

Goal 1. Restore, Sustain, and Enhance the Nation's Forests and Grasslands

- Objective 1.1 Reduce the risk to communities and natural resources from wildfire
- Objective 1.2 Suppress wildfires efficiently and effectively
- Objective 1.3 Build community capacity to suppress and reduce losses from wildfires
- Objective 1.4 Reduce adverse impacts from invasive and native species, pests, and diseases
- Objective 1.5 Restore and maintain healthy watersheds and diverse habitats

Goal 2. Provide and Sustain Benefits to the American People

- Objective 2.1 Provide a reliable supply of forest products over time that (1) is consistent with achieving desired conditions on NFS lands and (2) helps maintain or create processing capacity and infrastructure in local communities
- Objective 2.3 Help meet energy resource needs.

Goal 4. Sustain and Enhance Outdoor Recreation Opportunities

- Objective 4.1 Improve the quality and availability of outdoor recreation experiences
- Objective 4.2 Secure legal entry to national forest lands and waters
- Objective 4.3 Improve the management of off-highway vehicle use

Goal 5. Maintain Basic Management Capabilities of the Forest Service

- Objective 5.1 Improve accountability through effective strategic and land management planning and efficient use of data and technology in resource management
- Objective 5.2 Improve the administration of national forest lands and facilities in support of the agency's mission

### ***Public Issues***

Public issues have been identified as follows, and the significant issues will be addressed in the development and evaluation of alternatives.

**Access:** Forest management strategies may affect the balance between public and management needs for motorized access to Forest lands (for recreation, hunting, management activities, fire suppression) and protection of soil and water resources, wildlife populations and habitat, aesthetics, forest health, and desired vegetation conditions.

**Watershed:** Management activities may affect soil quality, water quality (surface and groundwater) and riparian resources, including drinking water watersheds and those watersheds with streams impaired due to activities off the Forest. Forest Plan management

strategies may affect the maintenance and restoration of aquatic biodiversity and may affect species with potential viability concerns.

**Terrestrial Biological Diversity:** Forest Plan management strategies may affect the maintenance and restoration of the diverse mix of terrestrial plant and animal habitat conditions and may affect species with potential viability concerns.

**Old Growth:** Forest management strategies may affect the potential biological and social values associated with the abundance, distribution and management of existing and future old growth.

**Forest Health:** Forest Plan management strategies may affect the spread and control of nonnative invasive species, forest pests, and pathogens, all of which have the potential to affect long-term sustainability, resiliency, and composition of forest ecosystems.

**Wind Energy:** Responding to opportunities to develop wind energy generation may result in effects on a wide variety of resources (including birds, bats, scenery, trail use, soils on ridgetops, water, noise, remote habitat, local communities/economies, and social values).

**Oil And Gas Leasing:** Use of National Forest System lands to support energy needs through federal oil and gas leasing may affect forest resources and impact adjacent private lands.

**Fire:** The management of fire to achieve goals related to protection of property, wildlife habitat, ecosystem diversity and fuels management may affect air quality, non-native invasive species, recreation, urban interface, water quality, wildlife, and silviculture.

**Recreation:** Forest management strategies should determine an appropriate mix of sustainable recreational opportunities (including trail access) that responds to increasing and changing demands and also provides for public health and safety and ecosystem protection (such as soil and water resources, nesting animals, riparian resources and spread of non-native invasive species).

**Wilderness and Roadless Areas:** Forest management strategies may affect the balance between the desires for permanent protection of remote areas and the desires for management flexibility and ability to respond to changes in ecological, social and economic conditions when identifying areas to be recommended for Wilderness and determining how potential wilderness areas and other remote areas should be managed.

**Timber Harvest:** Forest Plan management strategies may affect: a) the amount and distribution of land suitable for the sustainable harvest of timber products; b) the amount of timber offered by the Forest; c) the role of timber harvest in benefitting local economies and other multiple use objectives; and d) the methods used to harvest the timber. If the Forest responds to needs for biomass for energy production, whole tree harvesting may affect nutrient cycling, wildlife habitat, and soil productivity and stability. Timber harvest may have effects on other resources.

Economics and Local Community: Management activities may affect the economic role of the Forest, particularly the role it plays in the economy of local communities, including the production of ecosystem services and commodity outputs. Increasing population and development near the Forest may influence management activities such as special use requests, fire management, and responses to additional recreation demands.

Climate Change: Changes in climate may require adaptation strategies that facilitate the ability for ecosystems and species to adapt to changes in conditions (such as stream temperature, community vegetation composition, and invasive species). Forest management activities may exacerbate the impacts of climate change or mitigate the impacts through adding to or sequestering carbon or enhancing opportunities for alternative energy sources (wind, biomass, solar).

### ***Management Concerns and Resource Use and Opportunities***

The Analysis of the Management Situation will identify management concerns, recommendations on the need to change the Forest Plan, and resource opportunities.

### ***Plans and Programs of Other Agencies and Governments***

Plans and programs of Federal agencies, State and local governments, and Indian tribes will be reviewed as required in **Sec. 219.7(c)**. This will include county comprehensive plans, state wildlife action plans and state forest assessments. This review may result in additional criteria.

### ***Ecological Factors***

The forest plan and alternatives will consider the effects of climate change on forest resources and the effects of forest activities on climate change. The management actions needed to restore, sustain, and/or enhance the composition, structure, and function of the ecological communities within the Forest will be evaluated.

### ***Economic Factors***

As addressed in **Sec. 219.1(a)**, the plan *shall provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long term net public benefits in an environmentally sound manner.*

Budget constraints based on past funding trends will be used in the development of desired conditions and objectives to provide meaningful measures that can reasonably be expected.

### ***Resource Integration: Timber resource land suitability***

*During the forest planning process, lands which are not suited for timber production shall be identified in accordance with the criteria in Sec. 219.14.*

### ***Resource Integration: Vegetation management practices***

*When vegetation is altered by management, the methods, timing, and intensity of the practices determine the level of benefits that can be obtained from the affected resources. The vegetation management practices chosen for each vegetation type and circumstance shall be defined in the forest plan with applicable standards and guidelines and the reasons for the choices as identified in **Sec. 219.15**.*

***Resource Integration: Timber resource sale schedule***

*In a forest plan, the selected forest management alternative includes a sale schedule which provides the allowable sale quantity. The sale schedule of each alternative, including those which depart from base sale schedules, shall be formulated in compliance with **Sec. 219.16**.*

***Resource Integration: Evaluation of roadless areas***

*(a) Unless otherwise provided by law, roadless areas within the National Forest System shall be evaluated and considered for recommendation as potential wilderness areas during the forest planning process, as provided in **Sec. 219.17**.*

The first step in the evaluation of potential wilderness is to identify and inventory all areas within National Forest System (NFS) lands that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act. Areas of potential wilderness identified through this process are called potential wilderness areas. Follow the “Guidance on How to Conduct the Potential Wilderness Area Inventory for the Revision to the Revised George Washington National Forest Plan.”

Carefully evaluate potential wilderness areas as potential additions to the National Wilderness Preservation System to determine the mix of land and resource uses that best meet public needs. An area recommended as suitable for wilderness must meet the tests of capability, availability, and need. In addition to the inherent wilderness quality it possesses, an area must provide opportunities and experiences that are dependent upon or enhanced by a wilderness environment. Also consider the ability of the Forest Service to manage the area as wilderness. (FSH 1909.12 CHAPTER 70 - WILDERNESS EVALUATION)

***Resource Integration: Wilderness management***

*Forest planning shall provide direction for the management of designated wilderness and primitive areas in accordance with the provisions **Sec. 219**.*

***Resource Integration: Fish and wildlife resource***

*Fish and wildlife habitat shall be managed to maintain viable populations of existing native and desired non-native vertebrate species in the planning area. For planning purposes, a viable population shall be regarded as one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area. In order to insure that viable populations will be maintained, habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area.*

*(a) Each alternative shall establish objectives for the maintenance and improvement of habitat for management indicator species as identified in **Sec. 219.19.***

***Resource Integration: Grazing resource***

Grazing may be used as a tool to meet habitat diversity objectives or recreation objectives.

***Resource Integration: Recreation resource***

*To the degree consistent with needs and demands for all major resources, a broad spectrum of forest and rangeland related outdoor recreation opportunities shall be provided for in each alternative. Planning activities to achieve this shall be in accordance with **Sec. 219.2.***

The identification of recreation opportunities will include an updated inventory of Recreation Opportunity Spectrum classification.

The Scenery Management System will be used in planning to identify visual resources and guide management of these resources.

The plan will provide a diversity of recreation opportunities on the Forest including motorized and non-motorized recreation.

***Resource Integration: Mineral resource***

*Mineral exploration and development in the planning area shall be considered in the management of renewable resources as identified in **Sec. 219.22.***

Private mineral rights will be considered in all decisions made in the planning process.

The environmental analysis will evaluate alternatives for oil and gas leasing availability and the Record of Decision will include a decision on the designation of those lands administratively available for federal oil and gas leasing (36 CFR 228.102).

***Resource Integration: Water and soil resource***

Forest planning shall provide for protection and management of the water and soil resource as identified in **Sec. 219.23.**

The identification of water uses will highlight public drinking water supplies on the Forest and nearby sources that rely on waters of the National Forest. It will also discuss the potential for future requests for water withdrawals.

***Resource Integration: Cultural and historic resources***

*Forest planning shall provide for the identification, protection, interpretation, and management of significant cultural resources on National Forest System lands. Planning of the resource shall be governed by the requirements of Federal laws pertaining to historic preservation, and guided by Sec. 219.24.*

***Resource Integration: Research natural areas***

There are no Research Natural Areas (RNA's) currently being considered for identification.

***Resource Integration: Diversity***

*Forest planning shall provide for diversity of plant and animal communities and tree species consistent with the overall multiple-use objectives of the planning area. Such diversity shall be considered throughout the planning process. Inventories shall include quantitative data making possible the evaluation of diversity in terms of its prior and present condition. For each planning alternative, the interdisciplinary team shall consider how diversity will be affected by various mixes of resource outputs and uses, including proposed management practices as identified in Sec. 219.26.*

The diversity analysis should be based on processes readily identifiable with other state or national systems, such as NatureServe. The analysis will address both ecosystem and species diversity. The diversity analysis will include karst

***Management requirements***

*The minimum specific management requirements to be met in accomplishing goals and objectives for the National Forest System are set forth in this section. These requirements guide the development, analysis, approval, implementation, monitoring and evaluation of forest plans.*

*(a) Resource protection. All management prescriptions shall--*

*(1) Conserve soil and water resources and not allow significant or permanent impairment of the productivity of the land;*

*Conserve geologic resources to minimize geologic hazards and protect sensitive karst areas and their related groundwater and biodiversity resources;*

*(2) Consistent with the relative resource values involved, minimize serious or long-lasting hazards from flood, wind, wildfire, erosion, or other natural physical forces unless these are specifically excepted, as in wilderness;*

*(3) Consistent with the relative resource values involved, prevent or reduce serious, long lasting hazards and damage from pest organisms, utilizing principles of integrated pest management. Under this approach all aspects of a pest-host system should be weighed to determine situation-specific prescriptions which may utilize a combination of techniques including, as appropriate, natural controls, harvesting, use of resistant species, maintenance of diversity, removal of damaged trees, and judicious use of pesticides. The basic principle in the choice of strategy is that, in the long term, it be ecologically acceptable and compatible with the forest ecosystem and the multiple use objectives of the plan;*

- (4) Protect streams, streambanks, shorelines, lakes, wetlands, and other bodies of water as provided under paragraphs (d) and (e) of this section;*
- (5) Provide for and maintain diversity of plant and animal communities to meet overall multiple-use objectives, as provided in paragraph (g) of this section;*
- (6) Provide for adequate fish and wildlife habitat to maintain viable populations of existing native vertebrate species and provide that habitat for species chosen under Sec. 219.19 is maintained and improved to the degree consistent with multiple-use objectives established in the plan;*
- (7) Be assessed prior to project implementation for potential physical, biological, aesthetic, cultural, engineering, and economic impacts and for consistency with multiple uses planned for the general area;*
- (8) Include measures for preventing the destruction or adverse modification of critical habitat for threatened and endangered species;*
- (9) Provide that existing significant transportation and utility corridors and other significant right-of-ways that are capable and likely to be needed to accommodate the facility or use from an additional compatible right-of-way be designated as a right-of-way corridor. Subsequent right-of-way grants will, to the extent practicable, and as determined by the responsible line officer, use designated corridors;*
- Provide for the acquisition, disposition and exchange of National Forest System lands to address access needs, trespass, fragmentation, and management needs;
- (10) Ensure that any roads constructed through contracts, permits, or leases are designed according to standards appropriate to the planned uses, considering safety, cost of transportation, and effects upon lands and resources;*
- (11) Provide that all roads are planned and designed to re-establish vegetative cover on the disturbed area within a reasonable period of time, not to exceed 10 years after the termination of a contract, lease or permit, unless the road is determined necessary as a permanent addition to the National Forest Transportation System; and*
- (12) Be consistent with maintaining **air quality** at a level that is adequate for the protection and use of National Forest System resources and that meets or exceeds applicable Federal, State and/or local standards or regulations.*

Meet the (b) Vegetative manipulation; (c) Silvicultural practices; (d) Even-aged management; (e) Riparian area; (f) Soil and water; and (g) Diversity requirements of **Sec. 219.27**.

**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

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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

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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](mailto: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

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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 minimally 100 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

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John Eckman  
Executive Director  
Valley Conservation Council  
[www.valleyconservation.org](http://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 provide 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 likely 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 CO<sub>2</sub>—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 “below

cost”, costing the US taxpayers more money than 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*