October 9, 2011

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

Dear Supervisor Hyzer:

I am writing to register my comments on the draft Land and Resource Management Plan and draft Environmental Impact Statement for the George Washington National Forest (GW}.

I am gravely concerned that the Plan doesn't adequately protect the GW itself, it natural beauty and wildlife, and the people who live in and around it. I hope you will consider the following:

Industrial wind energy should NOT be allowed in the GW. The amount of land that would have to be cleared would destroy important habitats. Once gone, the breathtaking mountain vistas will never be recovered. Populations of birds and bats that use the ridges as flyways will be decimated.

The GW should NOT allow timber sales to fuel biomass incinerators. The process itself produces large amounts or air pollution, requires the destruction of huge numbers of trees as well as the use of far too much water. We NEED our forests as carbon sinks to combat the effects of climate change!

Please KEEP in place the draft Plan's prohibition on horizontal drilling. The role of hydraulic fracturing in water quality degradation and other environmental hazards is well-documented.

The GW should NOT make further gas/oil leases available, and should discontinue existing leases as they expire. The draft Plan allows gas/oil leases on over 90% of the forest, which compromises far too many biological, scenic, and recreational resources.

Please KEEP and increase the 160 mile target for road decommissioning in the draft Plan. It will help reduce stream sedimentation and improve habitats and general forest recovery.

Please protect ALL of the potential wilderness areas from new road and timber sales.

Please create more wilderness study areas in the Plan to protect more of our remote forests, and designate more Special Biological Areas to protect uncommon natural communities.

Please adopt Alternative Cas the Preferred Alternative and as the Final Land and Resource Management Plan for the GW.It takes the long view of resource protection instead of short-term resource destruction.

Finally, a more personal note: I am a middle school counselor. We just took our 7'h graders on an overnight cam pout. Many of them had never swum in a natural stream, or slept in a tent, or walked in the woods. The wonder and delight on their faces was magical. There is a great book, *Last Child in the Woods,* that addresses the risks of children growing up without the myriad benefits to soul and spirit of spending time in natural areas. Virginia has an endangered wonderland of mountains and forest, of bears and bobcats, of ravens and ridges, in the George Washington National Forest. I beg you to please not allow this natural treasure to be turned into another industrial wasteland. There is so little natural left for our children already.

Thank you for your consideration of my comments on the draft Plan.

Very sincf'rely,
Laurie McDade

Everett Kauffman
October 10, 2011

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

Dear George Washington National Forest Plan Members,

As a concerned United States citizen and Harrisonburg City, VA resident, I feel industrialization in the Shenandoah Valley Region on federal land, specifically natural gas horizontal drilling and or hydrofracking in Marcellus Shale and or Oriskany Shale along with ils related development is not compatible with agriculture, hunting, fishing, undeveloped forest areas, recreation, and tourism in Rockingham County, Virginia or in the George Washington National Forest (GWNF). I am pleased that the EPA has a study happening over hydrofracking contamination. As you know the "FRAC ACT" is revisiting the 2005 Energy Policy Act that tied the hands of the DEQ and gave exemption that allowed natural gas drillers to pollute air and water without restrictions or regulations causing health and environmental hazards. Also, I believe that the current drilling process for natural gas (hydrofracking) still has potential dangers and can have irreversible impacts on the water, land, and ai.r in the GWNF and from our area into other areas. My wife goes often to the GWNF to enjoy its beauty and safe sanctuary.

She deals with chronic disabling symptoms everyday that result from multiple exposure to chemicals deemed to be "safe." Her life now revolves around avoiding further chemical exposure. She is not able to participate in normal community or social activities nor is she able to help with household chores. Her parents and I are actively involved in her care. (It has been stressful to all family members.) She is able to go frequently to enjoy the beauty and sanctuary of the GWNF where she has not needed to fear chemical exposure. Yet now even this is threatened with the issue of hydrofracking.

I believe the Weeks Act of 1911 established eastern national forests "for the purpose of conserving the forest and the water supply of the States" and "for the protecti.on of the watersheds of navigable streams." I also believe the Department of Agriculture put out a circular written by Forest Service Chief Henry Graves. This circular gave more detail on other benefits than just the fundamental purpose of the bill to protect watersheds of navigable streams. "Among these are protections against disastrous erosion of the soil on mountain slopes", "preservation of the purity and regularity of flow of the mountain streams, with a view to their use for the water supply of towns and cities", and "preservation of the beauty and am-activeness of the uplands for the recreation and pleasure of the people."

I am more concerned about how hydrofracking will affect not just the GWNF, but the water, air and safety of residents throughout the Shenandoah Valley. Should hydrofracking occur in Rockingham County, Bergton, the GWNF or any other areas, it would contaminate the water supply to Harrisonburg

as well as contaminate the air for miles around. As you are aware, the hydrofracking companies do not have to disclose these chemicals to the public. Though the companies assure us they are safe, I believe citizens have a right to know what chemicals are heing used and determine for themselves if they consider them to be a risk. If these chemicals are safe, as the oil company claims, they should have no problem disclosing them for puhlic review.

My wife is a citizen with a medical condition diagnosed as Multiple Chemical Sensitivity. She developed this from multiple low level chemical exposures. All the chemicals which caused damage were considered to be safe. A person can develop this condition from one high level chemical exposure as well. The chemicals used for just one hydrofracking well could be enough to cause many more persons with her condition. Yet not just one hydrofrack is under consideration, but many more if hydrofracking is allowed in the GWNF. This could affect thousands of people. Multiple chemical sensitivity is a disabling condition. Persons like my wife can not be active working members of society, but actually have to rely on disability to live.

Last year, during their public meetings and public comment period on the Proposed Draft Forest Plan, the GWNF made a tremendous effort to listen to concerned citizens', environmental organizations' and various localities' comments specifically on horizontal drilling using hydrofracking for natural as. I support the GWNF proposed ban on this type of drilling and support that they have incorporated better protections for our drinking water in their Draft Land and Resources Management Plan and their Draft Environmental Impact Statement. During the current 90 day GWNF comment period, any one is allowed to attend the public meetings and make verbal and or written comments. I would encourage members of both subcommittees to attend these meetings and hear for themselves what is being said.

Even though I feel that landowners should generally be able to use their land as they choose, I feel that a careful responsible balance must happen between the landowners' rights and the publics' rights, so that no harm comes to: peoples' health; our agricultural health- plant and or animal; our environment - water, air, and or land; undermine our property values; our rural community life; our natural resources in state parks, national parks and or national forests so they can remain unfragmented while allowing for some recreation use areas.

Since the GWNF i.s known for its untainted quiet beauty and sanctuary, comments I am submitting for consideration are:

1. I urge the GWNF Planning Team to stop leasing federal land and prohibit new leasing of federal land for oil and natural gas drilling until sufficient environmental studies have been completed on the current drilling practices being used in the Marcellus Shale Regions. I suggest a longer and more strict written moratorium on any drilling permit applications or approval for the length of the plan or until the EPA study is completed late 2012.
2. I encourage them to consider potential irreversible damage to water, land, and air quality; pollution in general, but noise and light pollution specially related to horizontal drilling. I encourage them to set their own written safeguard guidelines (stipulations, restrictions, and regulations) on natural gas drilling and or hydrofracking, test wells and extracting the natural gas.
3. I encourage them to demand baseline testing, over a specified period of time, of water, land, and air (including a "Dispersion Modeling Map) in close proximity of lease. And I encourage them to set specific times and locations, to continue testing throughout entire process and continue this monitoring

3. (continued) of water and air in close proximity of that leased land forever, because the well casings will stay in the ground and capped wells will remain once the gas companies have left.
4. I encourage noise and light pollution restrictions. One example of restrictions would be to set a time of day limit for flaring. If compression site(s) or station(s) need to be located in the forest, the noise and light produced at these should also be considered. A second example of restrictions would be to construct a building around the compression site(s) to muffle sound.
5. I encourage them to demand from the gas companies full disclosure of each and every product labeled with complete chemical formulation with the quantity or concentrations of each and every chemical used in those products that will be used during the entire process.
6. I encourage testing of hazardous wastewater produced during the drilling and or fracking process and or released from underground during the drilling and or fracking process. Also, testing of hazardous wastewater solids produced during the drilling and or fracking process.
7. I encourage them to have in place from the gas companies monetary funds for financial responsibility in the amount of millions of dollars to cover pollution risks, and a means of collection on that financial responsibility. These monetary funds would cover compensation if contamination occurs throughout their drilling and or fracking, completion, stipulation, and or production stages, for example: cleanup in general of land, streams, private wells, etc.; provide drinking water for humans and animals in contaminated area; provide everyday water usage for humans like cooking, dish washing, bathing and or showering, clothes washing, toilet flushing, and hand washing in contaminated area; provide water for agricultural usage in contaminated area; compensation for temporary and or permanent loss due to contamination; compensation for decrease in land value in and around contaminated area; compensation for loss of health and or life - humans (various health issues can arise from water contamination - Multiple Chemical Sensitivity, skin disorders, tumors, etc. and various health issues can arise from airborne contamination - aggravation or causing asthma, causing other pulmonary disorders, endocrine diseases, Multiple Chemical Sensitivity and pediatric diseases) or animals (various health issues can arise from water contamination - cattle can be born blind or can die and various health issues can arise from airborne contamination- endocrine diseases, death in chickens and various diseases in horses) or plants (unhealthy and early death can occur).
8. I encourage them to consider where the proposed sites would be located within the GWNF and consider what impact the roads, that would be required during the natural gas drilling process, would have. Any national forest land use will have an impact on local communities and cities in close proximity. This could be a positive or negative impact. If development occurs, the positives might include, but not be limited to, new jobs and increased tourism. The negatives might include, but not be limited to, degradation of roads and bridges; fire hazards due to shortages of water, emergency responders and or equipment; loss of rural settings. Consider that four major floods, November 1985, November 1995, September 1996, (September 16, 1996 Daily News Record page 12) including one flash flood, January 1996, have hit Rockingham County in a relatively short time (flood information and dates compiled from Daily News Record and Daily News Record supplement). If natural gas drilling and or hydrofracking is allowed, any potential flood could allow hazardous chemicals entrance to our local water and land. This would negatively affect our local water and land as well as negativing affecting water and land further downstream of the natural gas dril.ling site. In this case, I believe the negatives far outweigh the positives.
9. I encourage them to consider careful regulating of water usage, storage and disposal in this type of drilling. They should require the applicant to verify where their water source will come from and to verify where the used contaminated water will be disposed of. Millions of gallons of water are needed

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On the issue of banning horizontal drilling using hydraulic fracturing, I support preferred option G of the proposed GWNF Land and Resources Management Plan. My exception to preferred option G is that I would prefer all of the area known as Beech Lick Knob to be designated as Recommended Wilderness Study Area because this undeveloped area needs to remain as natural as possible. Only in the area known as Beech Lick Knob would I support option F of the Proposed GNWF Land and Resources Management Plan where most of that area is designated as Recommended Wilderness Study Area.

I feel strongly that the duties of the House Committee on Natural Resources along with House Sub-Committee on Energy & Minerals Resources with their jurisdiction over mineral rights does not supersede the duties of the BLM/US Forest Service to preserve the purity and regularity of flow of the mountain streams, with a view to their use for the water supply of towns and cities.

Thank you for your time and consideration in reading my comments. Please consider this issue now, and take the time to further explore potential hazards as our future environment and health safety are involved.

Sincerely,

Everett Kauffman

Brenda Kauffman
October 10, 2011

George Washington Plan Revision
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9. We encourage them to consider careful regulating of water usage, storage and disposal in this type of drilling. They should require the applicant to verify where their water source will come from and to verify where the used contaminated water will be disposed of. Millions of gallons of water are needed

9. (continued) during the drilling of just one well. This amount of water usage even without a drought situation can have a drastic negative affect on local water levels. Causing adverse affects, like limited water for human consumption and for other animal and plant life as well. Contaminated drilling water storage and disposal will also need to be addressed because of the potential for adverse affects on human, plant and animal well being. One example of restrictions would be to demand that any water returned to the surface be stored immediately in sealed containers. At the present time, there are very few water treatment facilities set up to dispose of natural gas drilling contaminated water.

On the issue of banning horizontal drilling using hydraulic fracturing, we support preferred option G of the proposed GWNF Land and Resources Management Plan. My exception to preferred option G is that we would prefer all of the area known as Beech Lick Knob to be designated as Recommended Wilderness Study Area because this undeveloped area needs to remain as natural as possible. Only in the area known as Beech Lick Knob would we support option F of the Praposed GNWF Land and Resources Management Plan where most of that area is designated as Recommended Wilderness Study Area.

We feel strongly that the duties of the House Committee on Natural Resources along with House Sub-Committee on Energy & Minerals Resources with their jurisdiction over mineral rights does not supersede the duties of the BLM/US Forest Service to preserve the purity and regularity of flow of the mountain streams, with a view to their use for the water supply of towns and cities.

Thank you for your time and consideration in reading our comments. Please consider this issue now, and take the time to further explore potential hazards as our future environment and health safety are involved.

Sincerely,

James Shenk and

James A. Shenk

Eileen Shenk

Mark A. Kniss
October 10, 2011

George Washington National Forest
Forest Plan Revision
5!62 Valleypointe Parkway
Roanoke, VA 24019

To Whom It May Concern:

I an a private property owner on a ridge top in Rockingham County that is surrounded by the GWNF. I am aware that the ridge top where our property is located bas great potential for wind energy development. I am concerned that the Draft Plan proposes to designate certain areas surrounding our prope11y as not suitable for wind energy development. The Forest Service should not categorically exclude the ability to develop wind energy projects on ridge tops based on high level reviews of environmental sensitivities within the GWNF. Instead, because wind projects are subjected to vigorous environmental permitting requirements, the Forest Service should allow for ridge top projects to be approved'Of denied on a case-by-case basis. Development of wind energy in our ridge top community isnotpossible without Forest Service approval *[or* road access and transmission corridors through areas of the GWNF that may be designated as not suitable for wind development.

I would request that the final management be sensitive to private land owners by allowing for the special use permitting process to apply in the area surrounding our property.

Respectfully submitted,

Mark A. Kniss

October 10, 2011

George Washington National :F'orest
Forest Plan Revision
5162 Valleypointe Parkway
Roanoke, VA. 24019

To Whom It May Concern,

As a current landowner I have several private properties that are surrounded by the GWNF. It is my understanding that there are issues involving the current development of wind towers on my property and the properties of many landowners.

I would like to address these concerns in hopes that the situation on these issues can be fairly evaluated.

Many individuals in our community support the wind energy project, especially due to the current state of our economy. Although I realize that the development of road access and sensitivities to the environment are a concern, I feel that the positive returns from this project can only be categorized as a benefit for mu community.

As we aU know nuclear power plants are not only an expense but can be very dangerous to our community. We all need to look for more economic and environmentally safe ways to produce energy.

I feel as a landowner if I am wiUing to provide my property with very little return for these towers then the GWNF should give great consideration in this matter. Not only would it provide a safer energy and cost effective energy, I feel that the improvement in roads would also produce more access to hunters, creating the purchase of more hunting licenses which provides more capital to the state.

In closing, I wish that everyone would reflect one major goal and that is the use of the natural recourses that we have been provided. My Father as well as many men in this community fought for our Country and continue to do so. The freedom that they aUow us are to use our intelligence and see that this is a concern for our community that would

only provide a positive outlook for our future and the future of our children.

I hope that you will give this much consideration with an open heart and mind and foresee what this could mean for all of our families and community members.

Sincerely,

Charles and Phyllis Folk

Michael Mastropaolo

October 8, 2011

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

Dear Sir or Madam:

I am a Virginia citizen who, since 1965, has regularly enjoyed the wild forest lands ofthe George Washington National Forest and I want to provide my comments about the draft plan for the George Washington National Forest that was released in May this year. It is my understanding that the plan will establish how the forest will be used for the next 10 or more years.

First and foremost, my interest is in limiting activities/uses of the Forest to those that strictly promote keeping the Forest in its natural state. I therefore strongly object to activities/uses such as logging, road building to support logging, and mineral/gas/oil extraction as they impact wildlife habitat, pollute water and air and change the natural character of the forest. I strongly support activities/uses that promote non-motorized recreational activities including hiking, camping, fishing, hunting, birding, biodiversity study, plant survey/identification, restoration of the American chestnut and photography of scenic views, nature and wildlife.

As the rest of the countryside is quickly being developed for human use, our Natural Forest becomes more and more unique and in need of our efforts to protect it to keep it in its natural state.

Of the alternatives put forth in the draft plan, the only alternative I support is alternative "C". This alternative provides recreational opportunities required of our Forest and protection required by our Forest.

Thank you for the opportunity to provide you with my comments.

Sincerely,

Michael Mastropaolo

Carol Maureen DeHart

October 11, 2011

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

Dear Maureen,

Please review the enclosed documentary on the effects of hydroti·acking.
To allow such a procedure would destroy the National Forest and its watershed.

Thank you.

Sincerely,

Carol Maureen DeHmi

"Gasland"

October 11, 2011

I am writing in regard to the development of the final forest plan for the George Washington National Forest. As a native of West Virginia and a current resident of North Carolina, I have a strong connection to the natural areas ofthe Appalachian Mountains. During numerous visits during the past 30 years, I have enjoyed hiking in the forests of Virginia.

After reviewing the seven plans, I wish to express support for Alternative C. Overall, I believe this plan offers more protection for water quality, old-growth forests, and undeveloped regions. I would also support a ban on horizontal gas drilling and hydrofracking in the GWNF.

Thank you for considering public comments as you finalize decisions which will impact the GWNF for years to come.

Sincerely,

Georgia G. Ferrell

October 11,2011

George Washington National Forest
Forest Plan Revision
5162 Valley Pointe Parkway
Roanoke, VA 24019

As a landowner who owns private property on a ridge top in Rockingham County that adjoins George Washington National Forest, I would like to express my concern over the Draft Revised Land and Resource Management Plan. Our community strongly supports the development of wind energy and it appears the ridge top where my land is located has great potential for such wind energy development. It is of great concern that the proposed Draft Plan the surrounding George Washington National Forest as not suitable for wind energy development. Any wind energy development in our community on private lands will not be possible without Forest Service approval for needed road access and improvements and for transmission lines to connect to the existing power grid. The Revised Forest Service Plans should allow for the application of special use permits for the needed access and transmission on National Forest Land, not categorically exclude wind energy development. I would like to request that the final George Washington National Forest management plan take this into consideration and be sensitive to the private land owner in our community by allowing for the special use permitting process to apply in the area surrounding the proposed ridge for wind energy development.

ConocoPhillips

ConocoPhillips Company
San Juan Business Unit
3401 East 30th Street
Farmington, New Mexico 87401

October 14, 2011

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

Sent via fax to Chief of the Forest Service and Deputy Under-Secretary

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

ConocoPhillips Company ("COPC") appreciates the opportunity to provide comments on the U.S. Forest Service's ("USFS") draft Environmental Impact Statement ("DEIS") and Draft Revised Land and Resource Management Plan ("DRMP") for the George Washington National Forest. COPC is an international energy company with extensive expertise in exploration and production of petroleum products. COPC develops and produces energy within the National Forest Service ("NFS") lands. As such, COPC is a stakeholder and has a vested interest in these draft documents and their effect on oil and gas production, not only within the George Washington National Forest, but within all NFS lands.

COPC strongly urges the USFS to reject Alternatives B and D, which would impose an arbitrary moratorium on horizontal drilling until May 1, 2013, as well as Alternative F, which would impose a similarly and unjustified ban on horizontal drilling in public water supply watersheds in the GWNF. Further, COPC urges the rejection of Alternatives C, E and the preferred alternative G, as well as the Forestwide Standard FW-218 all which ban horizontal drilling in the Marcellus Shale. Simply put, the analysis in the DEIS does not justify the adoption of such strict restrictions on horizontal drilling. Instead, COPC supports the adoption of Alternative A of the DEIS, the No Action alternative, or any other alternative that does not impose bans on horizontal drilling or hydraulic fracturing.

General Comments

As a member of the American Petroleum Institute ("API"), COPC endorses the comments separately submitted by the API concerning this matter. We also recommend and reiterate the following general comments:

- The DRMP is unclear and inconsistent as to what the USFS is proposing to do with respect to the restrictions on oil and gas drilling contained in Preferred Alternative G and Alternatives B, D, E and F. According to the DEIS, "Alternatives E and G do not allow any horizontal drilling and hydrofracturing", but it is not clear as to whether this would ban all hydraulic fracturing operations in the GWNF, including hydraulic fracturing of vertical wells (vertical wells are allowed under Alternatives E, F and G), or whether it would only ban hydraulic fracturing of horizontal wells.

  COPC concurs with API in their request that the USFS clarify whether Alternatives B, D, E and F would prohibit all hydraulic fracturing or only hydraulic fracturing of horizontal wells.

- The DEIS and DRMP preferred Alternative G runs directly counter to recently articulated Administration policy on shale gas development. A ban on horizontal drilling in the GWNF would hinder efforts to reduce U.S. reliance on foreign sources of energy by increasing production of domestic resources like natural gas. It would also exacerbate the effects of climate change by preventing more cost-competitive, clean-burning natural gas from corning to markets and impede the creation of thousands of new jobs in local communities in and around the forest in the oil and gas, technology, service, transportation and related sectors.

- The DEIS and DRMP are inappropriate tools to regulate the oil and gas industry and are duplicative to federal regulations. BLM, the Department of Energy, and the EPA have considerably more expertise in the area of oil and gas industry regulation than the USFS. COPC believes that the USFS should defer additional regulation of industry via its 15-year plan for the GWNF to avoid duplicative and unnecessary regulation and conserve taxpayer resources.

NFS lands contain prolific hydrocarbon reserves which provide highly significant contributions to domestic energy supplies. Recognizing that geologic formations within the NFS land presents a unique set of opportunities for domestic energy development; it is of critical importance for these activities to proceed without unwarranted constraints. The USFS is obligated to maintain Federal land usage consistent with the congressionally mandated multiple-use mission. The preferred Alternative, if adopted, will drastically compromise the multiple-use approach of previously established valid, existing rights of energy developers and would essentially close the entire resource to energy development.

Inevitably, new mandates, restrictions or requirements that prohibit certain oil and gas producing activities under the DRMP and DEIS will result in unnecessary impediments to job creation. Therefore, COPC believes there will be a huge economic impact that will potentially result in fewer, if any, wells being drilled resulting in less revenue in the form of taxes and royalties to the Federal government. We do not believe these economic impacts are adequately addressed or weighed in the draft report.

Closing

For the reasons mentioned above, COPC recommends Alternative A of the DEIS, the No Action alternative, or any other alternative that does not impose bans on horizontal drilling or hydraulic fracturing. Further, as stated in API's comments, API has created new standards, recommended practices and other guidance to augment the already safe and compliant operations of companies extracting oil and gas from shale deposits. API is the worldwide leading standards-making body for the oil and gas industry and has recently promulgated five new guidance documents that specifically address hydraulic fracturing: HF 1 (well construction and integrity guidelines), HF 2 (water management), HF 3 (mitigating surface impacts), Std. 65 Part 2 (isolating potential flow zones during well construction), and RP 51R (environmental protection).[1] API's standards, including this new guidance series, are informed by governmental regulations and serve to fill gaps in regulatory schemes. Neither the DEIS nor the Plan discuss how this new API guidance may have already addressed the concerns of the USFS.

We trust you will understand that COPC's comments are brief and may not encompass all the specific questions and concerns we may have about the DEIS and DRMP. However, our comments, along those submitted by API, address the largest areas of concern we have been able to identify at this time. We look forward to working closely with the USFS to improve communications and embrace the Federal lands multiple-use approach.

COPC is committed to protecting the National Forest Service Lands and we work collaboratively with a number of agencies to minimize the impact of our operations and improve the communities in which we operate to ensure a sustainable environment for the future.

Again, thank you for the opportunity to provide these comments on the DEIS and DRMP for the George Washington National Forest. Please feel free to contact me at (505) 326-9793 should you have questions or desire discussing our comments further.

Sintely,

. Sharon R. M

anager, Stakeholder Engagement and Regulatory Affairs
ConocoPhillips Company
San Juan Business Unit

Cc: Jim Vaiana
Eileen Dey
Melissa Shute

[1] *Available at* http://www.api.org/policy/exploration/hydraulicfracturing/index.cfm#guidance.

October 12, 2011

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

TO WHOM IT MAY CONCERN:

I own property located on Cow Knob that is surrounded by the George Washington National Forest. I strongly support the wind energy project and hopefully my land, and surrounding private land, can be used for the wind energy development.

I am concerned the Revised Land and Resource Management Plan that has been proposed would designate certain areas surrounding my property as not suitable for wind development therefore this project would be doomed.

I realize that wind energy development in the area around my land is not possible without the U. S. Department of Agricuture's Forest Service approval for road access and transmission corridors through areas of the George Washington National Forest.

My request is that you would take into consideration the private land owners' wishes and allow the special use permit process to apply in the surrounding Cow Knob area.

Thank you for your consideration in this matter.

Sincerely,

Ellen Dickenson

October 13, 2011

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

To Whom It May Concern:

My family owns property which is surrounded by George Washington National Forest located on top of the Shenandoah Mountain, known as Cow Knob. We are strongly in favor of a wind energy development for that area.

We are aware of the Draft Revision Plan and are concerned that the Revision proposes to designate certain areas surrounding our property as not suitable for wind development. We would very much like to participate in the wind energy development and hope you would take this in to consideration before cutting us off from having any say as to how our property is to be used. We realize without the approval of the Department of Agriculture's Forest Service for road access and transmission corridors through areas of the George Washington National Forest to these designated areas it will not be possible for us to particpate. We are requesting that you give us an opportunity by allowing for the special use permit process to apply in the area surrounding our property.

Thank you for your consideration.

Sara McDonald

COMMONWEALTH OF VIRGINIA

HOUSE OF DELEGATES

RICHMOND

TONY 0. WILT
POST OFFICE BOX 1425
HARRISONBURG. VIRGINIA 22803

TWENTY-SIXTH DISTRICT

COMMITTEE ASSIGNMENTS:
COUNTIES, CITIES AND TOWNS
AGRICULTURE. CHESAPEAKE AND NATURAL RESOURCES

October 10, 2011

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

To Whom It May Concern:

I am writing this letter to share my position on the George Washington National Forest (GWNF) Land and Resource Management Plan, specifically as it pertains to permitting access to the GWNF for energy development on bordering private lands in Rockingham County, Virginia.

There is currently a proposed wind farm project on private land that borders the National Forest that could be jeopardized ifthe developers are not permitted to utilize GWNF facilities to enable the development and construction of the project, and eventual transmission of power. If the new plan is revised in such a way as to not permit some use of GWNF facilities, this and other future projects may be delayed or abandoned .

The private property that is being considered for the development of the wind farm is almost completely surrounded by the National Forest, and therefore it is necessary that the developers are able to transport materials and equipment via Forest Service roads, and eventually be able to run transmission lines through the Forest to connect to the utility grid. It is not clear under the proposed plan if the Forest Service would even consider issuing a special use permit to gain access to the private property. If the Rockingham County Board of Supervisors deems it appropriate for the project to move forward, I see no strong evidence as to why the Forest Service should be unwilling to accommodate the development of the project. In a time when our nation and state are searching for ways to reduce our dependence on foreign oil, it is in our best interest to not prematurely eliminate options for alternative energy development.

I would like to urge you to maintain a status in the GWNF in Rockingham County that will be conducive to such energy development. I appreciate your serious consideration of this matter.

Sincerely,

Tony Wilt

DISTRICT: (540) 437l 450 " RICHMOND: (804) 698-1026 ''' FAX: (804) 698-6726

October 13, 2011

George Washington/Jefferson National Forests
5162 Valleypoint Parkway
Roanoke, VA 24019

Re: Forest Plan Revision

To Whom It May Concern:

I write in support of a ban on horizontal gas drilling in the GW and Jefferson National Forests.

As you know, there are plenty of natural gas and related resources elsewhere that are already being exploited in other natural areas including some nation.al forests. Do not allow the groundwater under the GW and Jeffersop. National Forests to be at rislu!f mllution when it is not necessary. We ail know that the quality of polluted groundwater i.s not easily and cheaply- if ever- restored once it becomes polluted.

As the son of a long ago USDAF'S fire towerman, fire control technician and timber cruiser, I support muiti-use forest plan concepts, but NOT at the expense of a real potential for long term loss of quality natural resources that the forests provide. Fresh water once polluted deep in the ground can almost never be remediated.

To allow to occur what we know is wro11g is as great a wrong.

Rick Fawley

October 10, 2011

George Washington National Forest
Attn: GW Plan Revision
5162 Valleypointe Pkwy.
Roanoke, VA 24019

Dear Forest Service:

I write to submit comments on your draft forest management plan. I grew up in Maryland and did my military service in the Washington DC area before settling in St. Louis for my career. The George Washington National Forest looms large as an asset of wild lands for the millions of people living in the mid-Atlantic region.

For the sake of comparison, here in Missouri we have eight wilderness areas protected, covering 71,000 acres in national forests and national wildlife refuges. In the GW you have only 43,000 acres protected in six small wilderness areas, and your current proposal would add only four small units totaling 20,000 acres. That is not enough.

I heartily support the Shenandoah Mountain National Scenic Area proposal. Local citizen groups have done a great public service by negotiating a consensus proposal for four wilderness units within a congressionally designated National Scenic Area of 115,000 acres. Specifically, the wilderness areas involved are Skidmore Fork, Little River, Lynn Hollow, and an addition to Ramseys Draft Wilderness. This proposal reflects the kind of collaboration your agency should be encouraging. Please include it in your tina!plan. Other wilderness areas should be added, including Little Allegheny Mountain, Laurel Fork, Three Sisters, Three High Heads, and additions to Rough Mountain and Three Ridges.

Off-road vehicle routes should be limited to existing routes. There is plenty of private land for ORV activities near the GW, so our national forest lands should not be exposed to ORV noise that prevents other visitors from enjoying the forest.

Thank you for the opportunity to submit these comments.

Since }?! yours, ,

Lynn Hague

Christina Wulf

October 14, 2011

Maureen Hyzer, Forest Supervisor
George Washinb>ton & 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.

Protection of intact forests for wildlife habitat is the most important use of the National Forests. Whereas timber and energy supplies can he extracted from other landscapes, species that rely on interior forest habitat cannot live anywhere else. To my eye, that makes land protection the highest use of the George Washington NF. Specific details on this follow in the comments below.

Protection of drinking water and water quality also top the list of the most important uses that the GW Plan should emphasize. Commercial timber harvest and energy production should not be allowed on the National Forest. Do not give away the biological integrity afforests owned by the American people to corporations looking for a quick & unsustainable buck.

Please note, in the comments below, I use much of the language and information put together by various conservation; however, the opinions expressed are very much my own. In other words, this letter should not be dismissed as some kind of form letter. Thank you.

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 fi·action 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 OW are very worthy ofWSA 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 OW. 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 OW 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 in2010}, and be lowered considerably from the recommended range of 1800-3000 acres/year.

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 lo 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 I 00 feet along perennial streams and 50 feet along intermittent streams specifi.ed 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 !50 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 macroinvcrtebrate sampling in streams and should be part of forest management.

[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. 1 believe the 160 mile target for road decommissioning during the tirst decade of the draft plan should be increased.

Energy:

Biomass Incineration- Using qur standing forests as a fuel source for biomass incinerators and electricity generation is a terrible idea. Because of the huge volumes offuel-trees--and water necessary and the large amount of air pollution-fine particulates and C02-that accompany biomass incineration, the George Washington National Forest should not allow timber sales that fuel biomass incinerators.

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 – ! strongly support the prohibition on horizontal drilling in the draft plan. This will reduce the risk of serious water quality degradation and other environmental concerns associated with hydraulic fracturing. Please keep this prohibition in place.

Making more oil and gas leases available in the George Washington National Forest would lead to dangerous impacts to water quality on the forest. Hydraulic fracturing is a common practice on vertical as well as horizontal wells. The draft plan allows standard oil and gas leasing, at least in some form. on roughly 994,000 acres, or 93% of the forest. The development accompanying wells, platJ(m11s and wellheads would compromise recreation, scenic and biological resources. The forest should not make any fmther leases uvailable and existing leases should be removed J1·om lease availability when they expire.

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.

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

Ecosystem Services··The economic analysis on the George Washington National Forest should include a full cost/benefit analysis of ecosystem services. Economic bcnet1ts 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 bcnet1ts should be compared at both the beginning and over the full IS 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 resomce values in the long term instead of liquidating them in the short term. For this reason, I request that you adopt Alternative Cas 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.

Christina Wulf

(printed on lOO'Yo recycled paper)

Brenna Layne

October 13, 2011

Plan Revision
U.S. forest Service
5162 Valleypointe Parkway
Roanoke, VA 24019

To whom it may concern:

I am writing in support of the ban on horizontal natural gas drilling in the George Washington National Forest.

The name "National Forest" says it all. National forest lands belong to the nation, not to energy companies. A forest is a habitat for plants and animals, and a place for people to learn to appreciate and respect them, not an oilfield to be exploited for finite resources that will be consumed quickly, laying waste perhaps permanendy to irreplaceable wilderness.

Thank you for all you do to preserve and protect our nation's wild places. Please uphold the ban. Keep our water clean and our forests standing tall so that my children's generation will not be the last to enjoy them.

Sincerely,

Brenna Layne

VIRGINIA
rORGANIZING

703 Concord Avenue
Charlottesville, VA 22903-5208
Tel: (434) 984-4655 • Fax: (434) 984-2803
http://www.virginia-organizing.ora

October 15, 2011

Maureen I-lyzer, Forest Supervisor
George Washington Plan Revision
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, Virginia 24019

Dear Ms. I-lyzer,

I am pleased to submit the following comments on the 2011 George Washington National Forest Draft Revised Land and Resource Management Plan and Draft Environmentallmpact Statement on behalf of the statewide membership of Virginia Organizing:

- Gas and Oil Extraction- Because the development of surface and fracking wells, platforms and wellheads compromise recreation, scenic water and biological resources. The plan should not make any further leases available and existing leases should be removed from lease availability when they expire.
- Biomass Incineration- Because of the huge volumes of fuel-trees-and water necessary and the large amount of air pollution-fine particulates and C02-that accompany biomass incineration, the plan should not allow timber sales that fuel biomass incinerators.
- Climate Change - Standing forests and intact soils are most valuable as carbon sillies than for any form of resource extraction. Old growth should be protected wherever it exists and projects that increase fragmentation which can hinder migration of species in the forest should not be allowed.
- Budget-The Plan should be as cost effective and have the lowest budget possible to maintain existing ecological and recreational resource values. Ecosystem services, the value of clean water, clean air, carbon storage, human health benefits and visual quality, all need to be considered in any cost-benefit analysis.
- Economic Analysis-The DEIS on the Plan alternatives should include a full analysis of net public benefits including ecosystem services.
- Wilderness- The GW is one of the very few places in the eastern United States where large areas of relatively undisturbed, mature forest still exist. All 372,000 acres of potential wilderness and roadless areas, including the 39,000a Little River area should be designated as wilderness study areas. The plan should also protect all Special Biological Areas that have been recommended for protection or special management by the Virginia Division ofNatmal Heritage including Paddy Run.

- Primitive Recreation- The plan and DEIS need to implement road closures to create a primitive recreation area which would include Little River and adjoining areas.
- Invasives- The plan should discontinue any management activities that encourage intrusion of invasive species including road building and creation of additional early-successional habitat.
- Herbicides- No herbicides have been proven totally safe to non-target species and ground water. Non-native invasive species should be removed by hand or mechanically and poisonous herbicides should not be used.
- Alternative C - As presented in the DEIS, Alternative C has the lowest budget of all alternatives and protects all resource values in the long term instead of liquidating them in the short term and maximizes long term net public benefits. For this reason, we request that you adopt Alternative C as the Preferred Alternative and as the Final Revised Land and Resource Management Plan for the George Washington National Forest.

Thank you for the opportunity to comment. Please keep me informed of any decisions or actions taken concerning the George Washington National Forest Plan.

Sincerely,
Sandra A. Cook
Chairperson

October 12, 20II

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

SUBJECT: Inclusion of Fungi in the 2011 George Washington National Forest Draft Land and Resource Management Plan and Draft Environmental Impact Statement

Dear Supervisor Hyzer,

I wish to submit the following comment on the role of fungi in the 2011 George Washington National Forest Draft Land and Resource Management Plan and Draft Environmental Impact Statement:

Fungi play a critical role in the GWNF ecosystem, and deserve study for both beneficial and destructive effects, Fungi are indispensable in maintaining a healthy forest, with *multiple benefits:* filtering silt; retaining moisture; digesting hydrocarbon pollutants; digest pathogenic microorganisms; mitigate the effects of acid rain; cool groundwater (helping trout populations among other benefits); reduce gypsy moth populations (Entomophaga maimaiga is a natural pathogen of gypsy moths); promote all species of oak through symbiosis; some species also have direct commercial value (mushroom sales). There are also *deleterious effects of fungus which need study:* white nose disease in bats; chestnut blight; Armillaria root rot is a major cause of oak decline; Canker-rot fungi cause serious damage to hardwoods, especially oaks; Annosus root rot damages conifers over much of the eastern U.S.

Steps which should be taken in the study offungi in the GWNF:

- Designate at least one species of fungi as a Management Indicator Species; recommended is *Armillaria me/lea* (honey mushroom), since it has both beneficial and deleterious impacts.
- Create a Special Biological Area for Fungi
- Expand the lichen monitoring program
- Create a Forest Service Research/Education Station in the Elkhorn Lake (North Ranger District) of the GWNF
- Create a position for at least one staff mycologist for the GWNF.

In addition, *hydrofracking (not}ust in horizontal drilling) should be banned throughout the GWNF.* It is an unproven technology, aspects of which are hidden as "trade secrets," and poses disastrous risks to fungi as well as to plants and animals.

Thank you for the opportunity to comment.

Sincerely,

Mark Heimcke

October 12, 20 II

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

SUBJECT: Watershed Protection in the draft Land and Resource Management Plan and draft Environmental Impact Statement for the George Washington National Forest (GW)

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.

I am glad to see the increa ed attention on public drinking watersheds and water resources in the draft plan when compared to the current plan. However, I believe more protective measures are needed. 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.

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 habitat for many sensitive species (e.g., salamanders, turtles).

On sloping lands, the draft plan requirements should be strengthened to at least the level of the Virginia Best Management Practices. Virginia BMPs call for streamside management zones along Municipal Water Supplies (including both perennial and intem1ittent streams) to be !50 feet wide where the slope of the ground is I 1-45%, and 200 feet wide where the slope exceeds 45%.

Sedimentation, unfortunately, is not directly measured or monitored under the draft plan. Measuring sedimentation in strategic locations and waterways will complement the macroinvcrtebrate 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.

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

Sincerely,

Mark Heinicke

George & Frances Alderson
112 Hilton Avenue
Baltimore, Maryland 21228

October 12,2011

US Forest Service
Attn: GW Plan Revision
5612 Valleypointe Parkway
Roanoke, VA 24019

Dear Forest Service:

Please include this letter as our comment on the draft plan revision for the George Washington National Forest. Thank you for sending us a copy of the draft plan. I (George) have visited the GWNF over a period of 45 years. Our friends have lived in communities near the forest. The GW is a very important part of our regional landscape. Maryland has no national forests, which makes the GW even more valuable to Marylanders as a place for outdoor recreation in wild, roadless areas,

The proposed plan, Alternative G, falls far short of what is needed in the management of the GWNF. It proposes too little wilderness and allows too much logging and development. The final plan should recommend statutory protection of more wilderness areas plus national scenic area or national recreation area status for three key areas.

1. Recommend More Wilderness. I remember 35 years ago when the Forest Service said nothing east of the Mississippi could be considered for wilderness designation. Fortunately that misguided policy was rejected by Congress. Wilderness is the best way to protect wild lands because it can't be revoked by the hasty decision of a political appointee, like what happened in 2003 when Secretary of the Interior Gale Norton abolished millions of acres ofBLM wilderness inventory areas in the West. The statutory protection of wilderness is the best protection available. We urge you to include these areas as wilderness in the final plan:

- Four units within the Shenandoah Mountain National Scenic Area (Little River, Rarnseys Draft Addition, Skidmore Fork, and Lynn Hollow). I (George) visited this area on two occasions.
- Big Schloss (approximately 30,000 acres) including the Little Stony Creek drainage and Three High Heads. I visited this area a few years ago and found it to have wilderness character. If necessary, boundaries can be drawn to exclude the Sugar Knob cabin.
- Beech Lick Knob, Laurel Fork, Three Sisters and Little Allegheny Mountain, and wildemess additions for Rich Hole, Rough Mountain, Three Ridges and Saint Mary's West.

2. Shenandoah Mountain National Scenic Area. The final plan should recommend the 115,000 acres of Shenandoah Mountain for designation by Congress as a national scenic area, protected against logging, road building, and mineral development. This proposal has been developed through meticulous negotiations with diverse stakeholders. It is the

best way of protecting the great wildland values of this outstanding complex ofroadless areasthe greatest single roadless resource on the GW.

3. Kelley MountainBig Levels National Scenic Area. The plan should include this area as another recommendation to Congress for statutory protection. The area has high ecological values and is popular with outdoor recreationists, including mountain biking.

4. Inventoried Roadless Areas. All inventoried roadless areas that are not recommended for wilderness status should be managed strictly under the Roadless Area Conservation Rule adopted by the Forest Service in 200 I.

5. Restrict ORVs. The final plan should limit offroad vehicles to routes where they are already allowed. At present you have four ORV trails of I0 to 36 miles each. No ORVs should be allowed in Inventoried Roadless Areas or anywhere near wilderness areas, because their noise and impacts destroy wild land values that people seek on the GW.

6. Prohibit fraclting. We support the Forest Service proposal in prohibiting [racking anywhere in tl1e GWNF. Horizontal drilling with hydraulic fracturing has proved to be a gas drilling method that imposes excessive impacts on the lands and waters.

7. Ban energy leasing. The final plan should ban oil and gas leasing and industrial wind turbines throughout the GWNF. Either would destroy many of the values the Forest Service has created in its restoration of these landscapes over the past I00 years.

8. Protect trail corridors. The lands visible from the Appalachian National Scenic Trail, Tuscarora Trail, Great Eastern Trail, and other major hiking trails should be protected in the final plan by prohibiting clearcutting and new roads. The Forest Service should seek the advice of trail-maintaining organizations such as Potomac Appalachian Trail Club and Appalachian Trail Conservancy.

Thank you for considering our views.

Sincerely,

George & Frances Alderson

C. Robert Wells

11 October 2011

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

Dear Forest Supervisor:

These comments are on your draft management plan. I have visited many national forests, from Mark Twain National Forest here in Missouri to the great forests in Oregon, where my wife grew up. One of our friends lives near you and has visited the George Washington often over a period of 45 years.

The Forest Service needs statutory protection for the greatest wild land areas of the GWNF. Future forest supervisors will be under severe pressure to let energy development into these areas. We can already see how oil and gas drilling has wrecked parts of the Allegheny National Forest in Pennsylvania.

The roadless areas on Shenandoah Mountain between U.S. 250 and U.S. 33 are an astonishing complex of wild lands. I favor a National Scenic Area of 115,000 acres to be designated by Congress to protect this area against development pressures. The stricter protection of wilderness should be given to qualifYing areas within the NSA, including Ramseys Draft Addition, Lynn Hollow, Little River and Skidmore Fork. I also favor expanding the Forest Service's minimalist wilderness proposals to add Laurel Fork, Little Allegheny Mountain, Three Sisters, Three High Heads, and additions to existing wilderness areas at Rough Mountain and Three Ridges.

Thank you for considering my comments.

Sincerely,

C. Robert Wells

Post Script,

I have been interested in and visited Eastern forests as early as 1932, George Washington's Bicentennial. By writing to "Boys' Life" magazine and requesting a black walnut from Mount Vernon, I received a single nut, planted it in Illinois where I lived as a boy, and it grew into a magnificent specimen. In 1937 at the first National Boy Scout jamboree held in the nation's capital, I was privileged to visit Washington's estate and see his respect and love for trees.

For posterity's sake and despite current pressures I trust that you and your colleagues will implement a more inclusive plan for Washington's namesake national forest.

Thank you now, even as coming generations will thank you later.

CRW

liz Robinson

October 7. 2011

George Washington Plan Revision
George Washington National Forest
5162 Valleypointe Parkway
Roanoke. VA 24019

Dear Planning Team:

Please consider the following comments on your draft forest plan. liere in southern Oregon ▌can see the mountains of the Rogue River National Forest from my window. The great Kalmiopsis Wilderness and the roadless areas of the RRNF are a tremendous asset to our region. My brother has lived in your region for 45 years and has greatly appreciated the George Washington National Forest.

▌favor "national scenic area"' status. with the protection of an Act of Congress. f(lr the Shenandoah Mountain unit. Big Schloss. and the Kelley Mountain-Big Levels unit. The NSAs will give future forest managers a stronger hand in resisting development pressures such as oil and gas drilling. wind turbines. and logging.

You now have only 43.000 acres in wilderness status. in six small units. That represents 4 percent of the total GW land area. That is not enough for a national forest situated within 2 hours• drive of 10 million people. Already you have seen the huge expansion of outdoor recreation. and it surely will continue to grow. It is time to expand the protection of wild lands by recommending wilderness f(lr Skidmore Fork. Little River. Lynn Hollow. Bald Ridge. Laurel Fork. Beech Lick Knob. Three High Heads. Little Allegheny Mountain, and additions to Ramseys Draft. Rich Hole, Saint Mary"s West. Rough Mountain and Three Ridges. The Forest Service proposal of four small units totaling 20,000 acres is completely inadequate.

▌heartily support your proposed ban on horizontal drilling for gas. The damage to the land and water quality from "fracking"' would be a great loss to the values of the GWNF.

Thank you for considering my comments.

Sincerely yours,

I am writing in opposition to the proposed ban on horizontal drilling found in the Draft Forest Plan for the George Washington National Forest. The proposed ban is not supported by the kind of scientific data or analysis that would be necessary to declare off-limits a potentially valuable resource that could meet our nation's and the Commonwealth of Virginia's future energy needs. Comments like "may impact water quality" are not strong enough reasons to ban techniques that have been incorporated safely and effectively in many other areas of the country for years, including Virginia, without incident.

Hydraulic fracturing is a technique that has been used over one million times since the thel940's without a documented instance of contamination, a fact confirmed by the EPA's own Lisa Jackson when she testified before congress saying that hydraulic fracturing doesn't affect water. Therefore there is not one shed of vetted scientific data that would support the proposed plan's assertion that drilling in the Forest would potentially affect water resources.

Furthermore, the proposed plan specifically bans horizontal drilling, a technique that has been utilized for 20 years in North America with amazing results. Drilling horizontally is the most effective and environmentally friendly way to harvest the resource. Horizontal wells expose more of the fmmation, which allows for production of a greater percentage of the natural gas. Also multi-well-single-pad drilling, the current dominant technique made possible through horizontal drilling, minimizes surface disturbance by concentrating wells in one location. This concentration of wells also limits the amount of pipelines, which further minimizes surface disturbance.

Lastly, the 900,000 acres that comprise the Forest is very close in size to Virginia's current natural gas producing area in the southwest comer of the State. Over the past 20 years, Virginia's natural gas industry has invested over $2 billion in the Commonwealth, paid over $600 million in royalties, paid over $150 million in severance taxes plus millions of additional dollars in real estate taxes and mineral taxes, while currently providing 3,000 good paying jobs. During that same 20-year period over 5,000 wells were drilled, under a very rigorous state-supported regulatory regime, without one water contamination issue. How can the Forest Service consider a ban that would forego all of the above benefits without the science to back it up?

In closing, I urge that you reject the ban on horizontal drilling in the Draft Forest Plan for the George Washington National Forest. Instead, consider the nation's energy needs that can be met by safely drilling in the Forest and producing clean-burning natural gas.

Jan and Gayla Kobialka

October 9, 2011

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

Dear Forest Service:

Please consider our comments on the draft forest plan. I am retired from the military. During my travels in the United States Air Force I saw many national forests all over the country. We are fortunate to live within 70 miles of the GWNF.

The Forest Service identified 37 "potential wilderness areas" in the GWNF with a total of 372,000 acres but the draft plan proposes only four of those for wilderness status, with a total of only 20,000 acres. You must do better in the final plan, because wilderness designation is vital to protect the wild roadless areas of the GWNF. Please add wilderness proposals in the final plan for Lynn Hollow, Skidmore Fork, Rough Mountain, Three Ridges, Little Allegheny Mountain, and Three High Heads.

In addition, please include the Shenandoah Mountain National Scenic Area of 115,000 acres, as proposed by Virginia citizens' groups, with four new wilderness areas embedded. Logging and other forms of development would be prohibited.

Please hold offroad vehicles to their present routes, with no expansion. The wild character of the GWNF would be compromised by allowing those noisy vehicles to take over any more of the land.

Thank you for considering our thoughts.

Sincerely yours,

Mrs. Pat Gochenour

Consultant

Education Specialist

134 Country Club Circle
Winchester, Virginia 22602
Telephone:(540) 662-2939

October 12, 2011

George Washington & Jefferson National Forests
5162 Valleypoint Parkway
Roanoke, VA 24019

Re: A comment on the US Forest Service's draft management plan for the GWNF

While George Washington was on the frontier of Virginia, finding and protecting his water source was top priority. So important was this to him that during his terms as Burgess from Frederick County, he sponsored this bit of legislation affecting the Town of Winchester, "prevent hogs running at large within the Town or the limits thereof." These hogs would have polluted his drinking water source, the Town Run! He identified his pollutant and did something about it! 250 years later, the residents of Virginia are in danger not only with one but two disastrous threats to our drinking water: Hydrofracking for Natural Gas and Uranium Mining!

In regard to Hydrofracking, a method of drilling for natural gas that allows penetration miles into the earth and horizontal drilling within particular geologic layers that contain natural gas, it is my understanding that it has perhaps an economic potentials which could be large but the environmental and infrastructure impacts of this type of drilling are of great concern, especially to the George Washington National Forest and the headwaters of the North Fork of the Shenandoah River, *our drinking water sources.*

It is my understanding that the US Forest Service's draft management plan for the GWNF contains better protections for areas of the forest that supply drinking water, and there is also a proposed ban on horizontal drilling (hydrofracking) for natural gas. *I suwort this proposal*. A large number of us have learned that too many of our natural resources are taken for granted, especially air and water. Many inhabitants of this fragile planet have come to understand what can happen if we pollute the water we drink and the air we breathe! Also, an interesting twist to the planning is that the US Forest Service can use George Washington as its icon to model actions all of us should take in dealing with present day critical issues.

"Labour to keep alive in your breast that little spark of celestial fire----conscience."
George Washington

S cerely yours:

Patricia W. ocheno

George Washington National Forest
General Management Plan Revision

Dear U.S. Forest Service,

I am writing to voice my opinion on the General Management Plan Revision for the George Washington National Forest. With the population of the Atlantic seaboard, Virginia, and even the Shenandoah Valley growing at an alarming rate, it is critical that the George Washington National Forest place maximum emphasis on environmental protection.

The new plan should do all that is necessary to protect the trees, wildlife, and watersheds of the national forest. Although tree harvesting should be included as part of the plan, wilderness and wildlife protection is also of massive importance. Specifically, the new plans should include a major expansion of the national wilderness preservation system. The neighboring Jefferson National Forest has expanded their wilderness protection in recent years, and now includes over twenty national wilderness areas. George Washington National Forest should now do the same. Accordingly, the following areas should now be designated national wilderness areas. These include: Adams Peak, Bald Ridge, Beech Lick Knob, Big Schloss, Kelley Mountain, Laurel Fork, Little River, Lynn Hollow, Skidmore Fork, Three High Heads, Three Sisters, and Whites Peak. In addition, Shenandoah Mountain deserves special protection. With the Mount Rogers National Recreation Area in the Jefferson Forest, and the Spruce Knob-Seneca Rocks National Recreation Area in the Monongahela, it is only right that the George Washington follow their lead and designate a Shenandoah Mountain National Recreation Area. This will help expand outdoor recreation in Virginia, and help the local economy with a major growth in tourism. This economic growth is critical during these troubled times. Let me close by thanking you for allowing the public to voice it's opinion on the future of the George Washington National Forest. I know that you will make the right choice, and protect the beautiful Blue Ridge Mountains of Virginia.

Thank you,

Cassie Simmons
October 9, 2011

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

Dear George Washington National Forest Planners,

I am in the senior graduating class at Broadway High School. Over the past two years, I have learned about the negative impacts that happen when natural gas drilling is allowed. I would like to support the GWNF proposed ban on horizontal natural gas drilling. To keep the area known as Beech Lick Knob in Rockingham County, Virginia undeveloped and natural, I request that it be designated as a Recommended Wilderness Study Area.

The 1911 Weeks Act was created to protect water and restore forests in our eastem states. The GWNF proposed ban on horizontal natural gas drilling is a good start on continuing to uphold that. I would like to continue to see our forest remain as natural as possible and our water to remain clean.

I would not like to see any of the negative impacts from natural gas drilling affect our forest or the Shenandoah Valley. The Forest Service proposed horizontal drilling ban is necessary to protect the GWNF's diverse natural resources from problems that can occur:

Water Impacts
- water shortage for humans, wildlife, farm animals, and agricultural needs
- contamination, accidental or otherwise, of our drinking water supplies, streams and rivers
- water purification problems

Air Impacts
- contamination from large quantities of truck n-affic and diesel equipment
- contamination from leaking or venting of large amounts of various gases

Land Impacts
- poisoning and total destruction of the forest soil and vegetation in various ways from toxic fracking chemicals and produced toxic wastewater

Forest/Wildlife Impacts
- fragmentation of forests and remote wild areas
-break-up of wildlife habitat
- loss of critical wildlife food sources
- increased wildlife roadkill
- poisoned wildlife unfit for human consumption

Forest/Wildlife Impacts continued
- contaminated wildlife aud aquatic life have offspring born dead or deformed
- hunting or trapping game driven away by increased traffic or noise and light pollution
- traditional hunting, trapping, or fishing grounds become restricted or posted
- soil compaction making it very difficult to re-plant and re-forest

Noise/Light Pollution
- 24/7 noise/li.ght pollution throughout the entire natural gas drilling process

I would not like to see our GWNF become an industrial forest from natural gas drilling! Again, I support the proposed ban on horizontal natural gas drilling. Also, to keep the area known as Beech Lick Knob in Rockingham County, Virginia undeveloped and natural, I request that it be designated as a Recommended Wildemess Study Area.

Thank you,

Cassie Simmons

Cassie Simmons

Pam Simmons

October 9, 2011

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

Dear GWNF Revision Plan Members,

I strongly support the GWNF ban on horizontal drilling for natural gas and think, by setting this ban, the GWNF is continuing to uphold the ideals of The Weeks Act to protect water and restore forests. I feel that the GWNF could have gone farther to protect our water and our forest by banning vertical drilling also. I would encourage them to heighten scrutiny on any allowed vertical drilling. I believe that current natural gas drilling processes (horizontal and vertical) can have irreversible impacts on our water, land and air. Also, I would prefer the GWNF area known as Beech Lick Knob in Rockingham County, Virginia to be designated as Recommended Wilderness Study Area in order to keep this undeveloped roadless area as natural as possible.

The Shenandoah Valley is known for great agriculture and forest areas. Here in the valley, hunting, trapping, and fishing make up a large part of our Virginia history and we want these activities to remain! The natural gas drilling process can have negative impacts including, but not limited to:

I. problems with our clean water
    1. due to water withdrawal from local sources causing shortages
        a. for our homes, agricultural, aquatic life and wildlife use
        b. for the health of our streams, river, and aquatic life
    2. from the toxic fracking chemicals and toxic wastewater produced during the process causing pollution (which in humans, wildlife, and farm animals through drinking contaminated water or breathing contaminated water vapors can cause various diseases including cancer, asthma, birth defects, nervous and gastrointestinal disorders, premature death, etc.)
        a. from various types of spills or leaks
        b. from improper dumping
        c. from trucks and equipment traveling from site to site
    3. from mountain rain runoff causing flash flooding and overflowing of produced toxic wastewater holding ponds
    4. due to access road construction for the truck and equipment traffic
        a. that cause sedimentation issues in our waterways
        b. that affect our water and aquatic life quality

II. problems with our traditional hunting, trapping, and fishing grounds

1. from fragmentation of our forest due to road construction, drill pads, storage areas, wastewater ponds, pipelines and other necessary infrastructure

a. causing break-up of wildlife migration routes

b. reducing wildlife food sources by cutting oak, beech, and mulberry trees and various berry bushes

c. creating openings for invasive plants to come in and take over

d. restricting access to our public lands where drilling is occmTing

e. causing land compaction that is difficult to re-plant and re-forest

f. causing forest destruction from legal and or illegal discharges of toxic fracking chemicals and toxic wastewater

2. causing decrease in wildlife due to increased roadkill from gas truck and equipment traffic

3. causing increase in wildlife contamination from drinking toxic water and eating contaminated vegetation

a. making it unfit for human consumption

b. causing birth defects and premature deaths

4. causing decrease in aquatic life and health from sedimentation and contamination issues

III. problems with our clean air

1. from pollution caused by the increased diesel truck and equipment traffic

2. from the leaking and venting of methane and other gases during the drilling process

3. from un-captured volatile organic compounds from gas wells that combine with nitrogen oxide to produce ground-level ozone (causing asthma and or respiratory deaths in humans, wildlife, and farm animals)

4. from aeration of produced toxic wastewater ponds (humans, wildlife, and farm animals breathing contaminated water vapors can develop various diseases including cancer, asthma, birth defects, nervous and gastrointestinal disorders, premature death, etc.)

IV. problems with the quiet sanctuary of our forest that can occur 24/7 throughout the entire natural gas drilling process due to increased truck traffic, heavy equipment usage, drilling and fracking of wells, compressor stations, etc.

1. from noise pollution affecting our daily living activities (including sleep and quiet outdoor activities like: sitting and relaxing, gardening, hiking, or conversing with our neighbors)

2. from light pollution affecting our sleep

Again, I support the GWNF proposed ban on horizontal drilling. I would encourage more scrutiny on any vertical drilling allowed. I would prefer the area known as Beech Lick Knob in Rockingham County, Virginia to be designated as Recommended Wilderness Study Area. Thank you for your time and attention in these matters.

tJt);,1;:/ cu (

Pam Simmons

COMMENTS ON GEO. WASHINGTON NF PLAN

Here are my comments on the proposed Geo. Washington NF plan:

(1) Create no more wilderness areas, there is too much land locked up now

(2) Expand the area suitable for timber management. Provide greater area of regeneration and low sera! stage habitat for wildlife. This is much needed both for economic and wildlife management reasons.

(3) Re-define roadless areas as areas that have no roads whatsoever, regardless of condition. This includes **roads re-c1assified as trails. Do not use road density as a criteria for designating roadless areas, as it is very** misleading and can be manipulated to falsely declare areas as roadless when they truly are not.

(4) SimplifY the plan by reducing the number of management areas, which make the plan write-up more lengthy and confusing. I think this can be done without compromising objectives.

(5) Base the plan on multiple use management rather than a slant to backcountry recreation or preservation.

(6) Declare all areas previously managed for timber under even-aged management since the 1960's exempt **from lock-up as wilderness or another designation., unless such areas are clearly environmentally unsuitab]e for future timber management because of terrain, water quality issues, etc. Don't discard work and money that was invested in the future.**

(7) Save the government money by greatly simplifYing the forest plan. No use to create a huge, expensive document such as the last JNF plan. With the present and upcoming budget constraints, the FS will not be able to implement it anyway.

Please consider these comments in developing your plan. Thank you.

Donald Spiller Retired Forester

October 16, 2011

Forest Supervisor
George Washington National Forest
5162 Valleypointe Parkway
Roanoke, VA 2401

After reviewing the seven alternatives proposed for the Forest Plan, I also favor Altemative G. However, I propose that the areas for early successional habitat be increased from 2-3% to 10 to 15% as recommended by VDGIF, ifl recall their estimates correctly.
This would provide for an increase in early successional habitat critical for many species during all or part oftheir annual requirements. We know that this habitat benefits turkeys, ruffed gronse, many song birds and deer, and other species as well.

While deer populations are shown to be increasing to stable on private lands for a number of rea ons, I suspect one of the primary reasons is more productive habitat in both acreage and vegetative quality.
Table B2.9, page 3-103 of the Draft EIS shows deer populations stable in many counties within the GWNF, and perhaps a lower stable population than you would find on private lands, and fom counties with decreasing populations.

Ever increasing stand ages will only support a more limited deer population and limited species populations which require the "edge effect" of early successional habitat.

VGDIF reported in an article in Virginia Wildlife that for the past several years, the GWNF has harvested about 800 acres per year, an acreage woefully short of that required by species dependent on early successional habitat.

An increased timber harvest for wildlife openings will also provide a larger and more stable volume for local forest industries.

I am a hunter and angler, and enjoy seeing wildlife when in the field, even though I may choose not to harvest it. I also enjoy the back country, and wilderness areas, but believe there should be a balance within the GWNF where areas are managed to a greater extent for wildlife, and greater wildlife diversity is encouraged.

Sincerely,

F. Knipping

NWTF

Hunt. Conserve. Share

October 9, 2011

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

RE: George Washington National Forest Draft ElS and
Draft Revisd land and Resource Management Plan

Dear George Washington NationalForest Planning Team:

The National Wild Turkey Federation (NWTF) is a nationalnon-profit organization dedicated to the conservation of the Wild Turkey and preservation of our !yunting heritage. Membership totals for the Virginia's as of Juhe 30,2011are 6,096 members in Virginia and 4,477 members in West Virginia. Considering that the George WashingJon National,ForestJGWNF) is the largest publi£Jand holdingin the Commonwealth with 1million acres,combined with nearly 105,000 acres ofthe GWNF located in West Virginia,the NWTF has a great interest in how the forest will be managed over the life of the pending forest plan. On behalf ofthe Virginia and West Virginia State Chapters of the NWTF, I offer the following comments.

The Q\11/NF has long standing cooperative agreements with the VirginiA Department gf Game and Inland Fisheries (VDGIF) and the West Virginia Division of Natural Resources {WVDNR). The NWTF strongly encourages continuedcooperatiop between these agencies for increased capabilities*pf* meeting management objective on.the forest by utilizing the expertise,manpower al{lp budget a.llocations. Tl:oe fiscal administration by state agencies of money derived from the sale of national forest stamps has proven to be monumental for active wildlife management on the GWNF.

The GWNF is an aging forest! Reduction in timber harvesting on the GWNF in recent years has resulted in a predominately mature forest. Nearly 40% of the GWNF is over 100 years old and 88% of the forest is over 70 years old. This forest age class structure has significant implications for wildlife populations, especially those species that require younger forest habitat conditions. A more balanced forest age class distribution will improve habitat conditions for wildlife species on the GWNF,especially those requiring herbaceous and early successional habitat conditions. Early successional habitat is lacking on the GWNF. Less than 1% of the forest is 10 years old or younger, while 3% is less than *20* years old. Many wildlife species that require this type of habitat are in serious decline (American Woodcock,

yellow-breasted chat, golden-winged warbler, prairie warbler, chestnut-sided warbler, etc.) Many other species, although not significantly declining, such as White-Tailed Deer and Ruffed Grouse would benefit from an increase in early successional habitat. Preferred alternative (G) proposes 1,800 to 3,000 acres of timber to be harvested annually over the life of the plan. The NWTF supports this goal and for the focus of harvests to be within the Oak Forest and Woodlands Type. The importance of reaching this goal on an annual basis cannot be over emphasized. Considering that the recommended harvest goal ofthe proposed plan does not differ from the current forest plan (Alternative A), 1,800-3,000 acres/ year, yet the average timber harvest over the last ten years is approximately 900 acres in all stand types. It is recommended that the GWNF administration seek out partnership or contracting opportunities to make this goal more attainable.

The limiting factor for Wild Turkey populations is the availability of brood range in the form of herbaceous opening such as established wildlife clearings, linear wildlife openings (seeded log roads), woodland savannahs, and log landings. This habitat type is critical for insect production which is a dietary necessity for turkey poults for several weeks after hatching. Specific to the plan, the NWTF is concerned with the language that these type of openings "MAY be present and maintained" and that the "expansion of existing openings and/or creation of new openings MAY occur" (Draft Forest Plan, Chapter 4, page 123, Mosaics of Habitat, 13-001). The NWTF recommends that standard 13-001 be replaced with the following two standards:

13-001: Approximately 5-B% of the lands will be in permanent herbaceous openings, including maintained wildlife openings, linear wildlife openings (seeded Jog roads), Jog landings, woad/and savannahs, and gross/and savannahs, that will be maintained by annual mowing, rotational mowing, or by prescribed fire.

It is strongly recommended that the creation or expansion of existing brood range be within the scope of all timber sales throughout the life of this plan. It is also recommended that the GWNF work with conservation organizations such as the National Wild Turkey Federation, Ruffed Grouse Society, Quality Deer Management Association and other like organizations that have a strong history supporting work on the forest and can often provide much needed monetary assistance and expertise for the development ofthese type of projects.

The NWTF supports the preferred alternative (G) increase of prescribed fire to 12,000-20,000 acres/ year. However, it is strongly recommended that prescribed fire not be substituted for timber harvesting. Utilizing prescribed fire in conjunction with even-aged management systems to eliminate competing species to benefit oak regeneration should be a primary objective of prescribed burning.

Open road densities should be determined by biological concerns and recreational access needs. Limiting the disturbance to wildlifeduririgthe breeding, nesting and brood rearing season is crucial to survival of many wildlife species. Disturbance often causes separation from adults and decreases the chance of survival during this period of growth. Seasonal closures should be the norm during the brood rearing season. Decisions on seasonal road closures should be uniform across the forest and determined in cooperation with biologists from the VDGIF and WVDNR. Recreational access to the GWNF for hunting, fishing, trapping, wildlife viewing is another important consideration when deciding to open

and close roads. Collaboration with state wildlife agencies will allow uniform information dissemination and education to users to better understand seasonal access changes.

Lastly, it is recommended that the GWNF utilize Stewardship Contracting in the future to attain management objectives and utilize the resources of organizations and partners in a time when fiscal limitations are the norm during all scoping processes. The NWTF has had great success on forests across the nation with Stewardship Contracting and is ready to lend expertise and experience to the GWNF management team to create diversity and achieve plan objectives.

Sincerely,
Patrick "Cully" McCurdy
Regional Biologist-VA/WV
National Wild Turkey Federation

cc: VA State Chapter President
WV State Chapter President

October 10, 2011

George Washington National Forest
Attn: Forest Plan Revision
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear Plan Revision Team:

The following are my comments on your draft plan revision. Here in Maryland we are within two hours' drive of the GW National Forest. One of my co-workers moved to Front Royal after living in the Washington DC area for most of his career, and he spent his final years living close to nature, just a few minutes away from the Massanutten unit of the GW.

The final plan must recognize that pressures are growing for more development on national forest lands, for energy (oil, gas, wind), off-road vehicle routes, and logging. The Marcellus Shale, currently a hot spot for the gas industry, may underlie parts of the GWNF. The Forest Service should be seeking Congressional measures to give a strong mandate to your managers of the future to protect the wild, roadless areas.

These measures should include a Shenandoah Mountain National Scenic Area to prohibit energy and mineral development and logging within 115,000 acres between US 33 and US 250, a 15-mile stretch of roadless areas that are separated only by a few forest roads. Within the NSA, the plan should recommend four wilderness areas to receive the most secure protection available, including the Bald Ridge addition to Ramseys Draft Wilderness, Lynn Hollow, Little River, and Skidmore Fork.

The draft plan takes a minimalist approach to wilderness, proposing only four units totaling 20,000 acres, out of 37 units you listed as "potential wilderness" in Table C4.1. Much more is needed to protect the wildest roadless areas of the GWNF. The final plan should add wilderness status for Little Allegheny Mountain, Laurel Fork, Three High Heads, Three Sisters, and additions to Rough Mountain and Three Ridges wilderness areas.

The draft plan is wise to ban horizontal gas drilling using the hydraulic fracturing method. Please keep this ban in the final plan. "Fracking" in the Potomac headwaters could jeopardize the clean drinking water supply of the Washington metropolitan area.

Thank you for the opportunity to submit these comments.

Sincerely,

R. Larry Laffoon

lo I and Won Yin
October 12,2011

U.S. Forest Service
Attention: Forest Plan Revision
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear Forest Service:

Please consider the following comments on the draft plan for the George Washington National Forest Our sons live in the West, near national forests in Washington and Colorado. Here we are fortunate to be within two hours of the GWNF, and much of our municipal water originates in the GW and Monongahela National Forests.

The Forest Service deserves credit for keeping the roadless areas of the GW in good condition over the past 100 years. It would be a shame if pressure for development such as energy projects, logging, and off-road vehicles, might lead to destruction of these areas. Congress should be asked to put these lands off-limits to development

We favor the proposal for a Shenandoah Mountain National Scenic Area of 115,000 acres, including Ramsey's Draft and the rest of this large complex of roadless areas. Congress should give the strictest protection, wilderness status, to four roadless units within it– the Bald Ridge addition to Ramsey's Draft plus Lynn Hollow, Little River, and Skidmore Fork, a total of 30,000 acres.

The draft plan only proposes four small units for wilderness status, totaling 20,300 acres. And yet Table C 4.1 lists 37 "potential wilderness areas" with a total of 372,000 acres. The draft plan leaves most of those lands vulnerable to development because they would not have the statutory protection of wilderness status. Please recommend the following areas for wilderness in the final plan: Little Allegheny Mountain, Big Schloss, Laurel Fork, Three High Heads, Three Sisters, and wilderness additions to Rough Mountain and Three Ridges. They have been carefully studied by Virginia conservation groups and found to be well qualified for wilderness status.

Please restrict offroad vehicles to the existing routes. Any expansion would mean the noise of dirt bikes and ATVs would spoil the forest for other visitors. No ORV routes should be allowed near any fishing streams, wilderness areas, campgrounds, or hiking trails. Thank you for this opportunity to participate.

Sincerely yours,

Lo D. Yin
Won D. Yin

Susan Plank
October 17, 2011

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

Dear GWNF Plan Revision Members:

Thank you for your work on this 10 to 15 year GWNF Revised Land and Resource Management Plan and Environmental Impact Statement. I have participated in numerous GWNF public meetings and comment periods regarding this new plan and appreciate that the public is allowed input. I support the GWNF proposed natural gas horizontal drilling ban and support that the GWNF has incorporated better protections for our drinking water in the Draft Land and Resource Management Plan and the Draft Environmental Impact Statement. I find it ironic that the Forest Service this year is having a centennial celebration of the Weeks Act of 1911 that established our eastern national forests "for the purpose of conserving the forest and the water supply of the States" and "for the protection of the watersheds of navigable streams." Other benefits of this bill (for our Appalachian Mountains) included "protections against disastrous erosion of the soil on mountain slopes", "preservation of the purity and regularity of flow of the mountain steams, with a view to their use for the water supply of towns and cities", and "preservation of the beauty and attractiveness of the uplands for the recreation and pleasure of the people."

As a concerned United States citizen and Rockingham County, VA resident (living at a private residence in the George Washington National Forest), I feel industrialization in the Shenandoah Valley Region on private and or federal land, specifically natural gas horizontal drilling and or hydrofracking in Marcellus Shale and or Oriskany Shale along with its related development is not compatible with agriculture, hunting, fishing, undeveloped forest areas, recreation, and tourism in Rockingham County, Virginia. Also, I believe that the cun·ent drilling extraction process for natural gas (horizontal or vertical) still has potential dangers and can have irreversible impacts on the water, air, and land in the GWNF and from our area into other areas.

If any type of drilling is allowed in the GWNF, I strongly suggest that strict written guidelines (stipulations, restrictions, and regulations) are necessary so that no harm comes to: peoples' health; our agricultural health - plant and or animal; our environment- water, air, and or land; undermine our property values; our rural community life; our natural resources in our national forests so they can remain unfragmented while allowing for some timber removal and recreational use. These strict written guidelines (stipulations, restrictions, and regulations) should include, but not be limited to:

A. Moratorium on permits and drilling

1. Suggestion of a longer and more strict written moratorium on any drilling permit applications or approval for the length of the plan or until the EPA study is completed late 2012, hopefully with new George Washington National Forest Service written guidelines (stipulations, restrictions, and regulations) set in place soon after to govern gas companies, forcing them to use safer methods of natural gas drilling and or hydrofracking test wells and extracting the natural gas.

A. Moratorium on permits and drilling (continued)

2. After the new EPA regulations are in place, include at least a six month to a one year moratorium on dri.lling to allow the GWNF to "catch up" and set their own written safeguard guidelines (stipulations, restrictions, and regulations) on natural gas drilling and or hydrofracking test wells and extracting the natural gas.

B. Disclosure of dates and times of exact stages

Before any work commences, the GWNF should require that the applicant inform the GWNF of the exact stages(s) being done on specific date(s) and time(s); this information should include, but not be limited to: date(s) and time(s) testing of drill will occur, drilling will occur, tracking will occur, and flaring or venting will occur. This information is necessary for public awareness, in case health issues arise in humans, animals and or the environment.

C, Full disclosure of each and every product labeled with complete chemical formulation

Before any permit is approved, the GWNF must require full disclosure from the applicant of each and every product labeled with their complete chemical formulation with the quantity or concentrations of each and every chemical used in those products that will be used during the entire process. This information is necessary for various safety related issues.

D. Regarding potential water, land, and air pollution

All of the following would have the GWNF choose the third party who performs the tests below, using each and every chemical on the provided lists, but have the gas companies pay for each:

1. Baseline testing, over a specified period of time-at least 1 full year before any gas drilling activity - of water, land, and air (including a "Dispersion Modeling Map) in close proximity of leased land.

2. Set specific times and locations, to continue testing throughout entire process.

3. Continue this monitoring of water and air in close proximity of that leased land forever, because the well casings will stay in the ground and capped wells will remain once the gas companies have left.

4. Consider that four major floods, November 1985, November 1995, September 1996, including one flash flood, January 1996, have hit Rockingham County, VA. If natural gas drilling and or hydrofracking is allowed, any potential flood could allow hazardous chemicals entrance to our water and land. This would affect our local water and land as well as affecting water and land further downstream of the natural gas drilling site.

5. Have responsibility from gas companies showing monetary funds with the ability to cover compensation if contamination occurs throughout their drilling and or fracking, completion, stipulation, and production stages; i. e. cleanup in general of land, streams, private wells, etc.; provide drinking water for humans and animals in contaminated area; provide everyday water usage for humans like cooking, dish washing, bathing and or showering, clothes washing, toilet flushing, and hand washing in contaminated area; provide water for agricultural usage in contaminated area; compensation for temporary and or permanent loss due to contamination; compensation for decrease in land value in and around contaminated area; compensation for loss of health and or life- humans (various health issues can arise from water contamination- skin disorders, tumors, etc. and various health issues can arise from airborne contamination - aggravation or causing asthma, causing other pulmonary disorders, endocrine diseases, and pediatric diseases) or animals (various health issues can arise from water contamination - cattle can be born blind or can die and various health issues can arise from airborne contamination- endocrine diseases, death in chickens and various diseases in horses) or plants (unhealthy and early death can occur).

D. Regarding potential wateiland, and air pollution (continued)

6. Testing of hazardous wastewater produced during the drilling and or tracking process and or released from underground during the drilling and or tracking process. Testing of hazardous wastewater solids produced during the drilling and or tracking process. Dates should also be set in advance for such tests to be completed for each and every site and where the test results will be shown for public record.

E. Regarding potential noise and light pollution

Before any permit is approved, I would encourage the national forest to consider the noise and light that will be generated. Parts of the natural gas drilling process run 24/7, are noisy and at night, light is required to continue work. One example of restrictions would be to set a time of day limit for flaring. If compression site(s) or station(s) need to be located in the forest, the noise and light produced at these should also be considered. A second example of restrictions would be to construct a building around the compression site(s) to muffle sound. The GWNF is known for its quiet untainted beauty and sanctuary. I would encourage some noise and light reduction requirements be set during the natural gas drilling process at all stages.

F. Water usage and disposal

I would encourage the GWNF to identify all local drinking water supply areas to be identified as priority watersheds. Before any permit is approved, the GWNF should require the applicant to verify where their water source will come from and to verify where the used contaminated water will be disposed of. Millions of gallons of water are needed during the drilling of just one well. This amount of water usage even without a drought situation can have a drastic negative affect on local water levels. Causing adverse affects, like limited water for human consumption and for other animal and plant life as well. Contaminated drilling water storage and disposal will also need to be addressed because of the potential for adverse affects on human, plant and animal well being. One example of restrictions would be to demand that any water returned to the surface be stored immediately in sealed containers. This would discourage wildlife from being drawn to and drinking the high salt content toxic produced wastewater making the animals unfit for human consumption. At the present time, there are very few water treatment facilities set up to dispose of natural gas drilling contaminated water. Regulating water usage, storage and disposal will need to be addressed at some level.

G. Consider where the potential leased sites would be located within the forest

1. Continue to consider any threatened and endangered species found in the national forest when choosing what land could be leased.

2. Consider carefully what areas could be leased to keep as much of the forest undeveloped and unfragmented, while allowing for some timber removal and recreational use areas. The entire gas drilling process can adversely affect GWNF's diverse biological resources. Consider what impact the required clear cuts and access roads would have during the entire natural gas drilling process. The large clear cut acreage necessary for gas drilling infrastructure would fragment wildlife habitat along with wildlife migration routes and destroy critical wildlife food sources. TI1e forest would have to be cleared for roads wide enough and strong enough for numerous heavy trucks and equipment throughout the entire process. Soil erosion from these clear cut areas and additional roads would negatively affect our stream health and aquatic life with sedimentation issues. Contamination can occur throughout the forest from contaminated trucks traveling to and from multiple gas sites. Wildlife roadkill would increase from the additional gas extraction related traffic. If any drilling is allowed the gas companies, in writing, should be required to pay for the cost of clearing the forest, building the roads, and upkeep of the roads during the entire process. During the entire process emergency vehicle access in case of catastrophe should be considered. Once gas is productive, this process would include permanent road access to a pipeline through the forest for trucks for pipeline upkeep and for emergency vehicles in case of catastrophe related to the pipeline.

G. Consider where the potential leased sites would be located within the forest (continued)

3. The gas companies, in writing, should be responsible with a bond large enough to cover the cost of potential spillage cleanup from any nucks and or equipment - some that will be carrying hazardous material.

4. The gas companies, in writing, should be responsible for the cost GWNF will incur in order to hire, more employees, to monitor the forest and roads during and long after the gas drilling process.

5. The gas companies, in writing, should be responsible with a bond large enough to cover the cost of reforestation (by GWNF or a third party) to GWNF's specification once the gas well has been capped and the gas companies have gone. The Planning Revision Team should keep in mind that some of the forest may never be reclaimed due to the upkeep required on the permanent nature of the equipment left behind in the natural gas drilling process.

H. Method of dispute resolution, financial responsibility, means of collection

Because of potential pollution problems related to all aspects of natural gas extraction, before any permit is approved, the GWNF should have in place from the gas companies a set method of dispute resolution with a neutral arbitrator in place; financial responsibility in the amount of millions to

I. Right to terminate and revoke permit

At any time after permit is approved, the GWNF must have the right to terminate and revoke the permit for any breach of requirements. At any time after the permit is approved, the GWNF, themselves or anyone they deem necessary, must have the right to inspect and perform testing at the site. At any breach of requirements, the GWNF would have the right to terminate and revoke the permit and then the gas company would have to immediately stop work and safely cap the well following permit grantee's written stipulated guidelines for well capping.

J. Consideration of local counties and cities affected by potential leased land

I would ask that the GWNF consider the impact the leased land would have on local counties and cities in close proximity. Any national forest land use will have an impact on communities located anywhere close. This could be a positive or negative impact. If development occurs, the positives might include, but not be limited to, new jobs and increased tourism. The negatives might include, but not be limited to, irreversible pollution of our water, air, and land; degradation of roads and bridges; fire hazards due to shortage of water, responders and or equipment; loss of rural settings; and loss of traditional outdoor activities use areas for hiking, hunting, trapping, fishing, and horseback riding.

Overall, but especially on the issue of banning natural gas horizontal drilling using hydraulic fracturing, I support the Forest Service preferred option G of the proposed GWNF Land and Resource Management Plan. In option G, I would prefer all of the area known as Beech Lick Knob to be designated as Recommended Wilderness Study Area because this undeveloped area needs to remain as natural as possible. Only in the area known as Beech Lick Knob would I support option F of the Proposed GNWF Land and Resources Management Plan where most of that area is designated as Recommended Wilderness Study Area. Befme vertical gas drilling is allowed in the GWNF, I feel a more thorough study of vertical gas drilling is needed.

I applaud the steps taken by the GWNF to not allow our forest to become an industrial forest. Thank you for your time and attention on this matter.

Sincerely,

Susan Plank

Roberta Nevitt

October 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. I have broken down my comments by topic.

Energy

1. Gas and Oil Extraction – I strongly support the prohibition on horizontal drilling in the draft plan. This will reduce the risk of serious water quality degradation and other environmental concerns associated with hydraulic fracturing. Please keep this prohibition in place.

Making more oil and gas leases available in the George Washington National Forest would lead to dangerous impacts to water quality on the forest. Hydraulic fracturing is a common practice on vertical as well as horizontal wells. The draft plan allows standard oil and gas leasing, at least in some form, on roughly 994,000 acres, or 93% of the forest. The development accompanying wells, platforms and wellheads would compromise recreation, scenic and biological resources. The forest should not make any further leases available and existing leases should be removed from lease availability when they expire.

In Virginia, only 29% of the historically occupied habitat still supports intact healthy brook trout populations. Much of the remaining habitat is found in the George Washington National Forest, which supports 60% (1,120 miles) of the state's brook trout streams. It is essential that these remaining brook trout populations are protected.

Brook trout in Virginia already face an uphill battle to remain at current population levels. In the George Washington National Forest, adding another threat from horizontal drilling and hydraulic fracturing could be devastating for the species. An entire stream could lose its brook trout if the large quantities of water necessary for hydraulic fracturing were taken from these headwater streams leaving them dry, or if produced waters from the

drilling and hydraulic fracturing process were spilled or disposed of in a brook trout stream.

For these reasons, I strongly support the Forest Service for including a prohibition on horizontal drilling on any new federal oil and gas leases in the George Washington National Forest. I thank the Forest Service for including these provisions and others such as increased widths for riparian corridor buffers and making brook trout a management indicator species in the Draft Forest Plan. These measures will help ensure that brook trout and coldwater resources of the forest are sustained, and I urge the agency to maintain these provisions in the final Forest Plan.

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.

2. 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.

3. **Biomass Incineration –** Using our standing forests as a fuel source for biomass incinerators and electricity generation is a terrible idea. Because of the huge volumes of fuel-trees-and water necessary and the large amount of air pollution-fine particulates and C02-that accompany biomass incineration, the George Washington National Forest should not allow timber sales that fuel biomass incinerators.

Roadless, Wilderness, and Special Biological Areas

1. Mature!Oid Growth Forest- 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 ail 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.

The Forest Service, in revising its plan for the management of the George Washington National Forest, is required by its own guidance to provide an improved inventory of all of this old-growth, all the large, medium and small stands. We are supposed to have this by now, in time for public participation (as required by law) and as a scientific basis for the decisions to be made. A good inventory of this possible old-growth, with clear enough locations of the old-growth stands is the first step for protecting them, and maybe for improving the whole restoration of our forest. We need a good inventory of possible old-growth and easily accessible information about possible timber contracts for any old-growth stands (no matter what size).

2. Special Biological Areas – 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.

3. 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. 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.

Water Resources

1. Drinking Water- 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. 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.

All of these points identify additional dangers to the brook trout population, please see my comments in Section 1. Energy.

Economic Analysis

1. 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 that the sales recoup. The George Washington National Forest Plan should be as cost effective as possible and have the lowest possible budget while maintaining existing ecological and recreational resource values.

2. 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.

3. 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 Cas 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. I enjoy living in Virginia and think that the George Washington National Forest is an asset to the state and all its people that we must protect now for our future generations.

Thank you for your consideration of my comments.

Sincerely,
Roberta Nevitt

T'U'R!N!E'R.'M.O'U'!{tT'lt'J'J{ P 'R.'.M, liC
PO OX218
1i'R.O vwgrr, V 22815-0218

October 15, 2011

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

Dear Sir or Madam:

Recently we learned that the Forest Service released a Draft Revised Land and Resource Management Plan (Draft Plan) for public review and comment We understand that the Forest Service recognizes wind energy development but the Draft Plan may adversely impact future wind development on privately owned ridge tops in Rockingham County, Virginia.

We own private property on Shenandoah Mountain west of Criders, Virginia that joins the George Washington National Forest. We are concerned that the Draft Plan proposes to designate certain areas adjoining our property as not suitable for wind development

Our community of families on Shenandoah Mountain strongly supports wind energy and a meteorlogical tower has been in place for nearly two years measuring wind potential. Wind projects will be subject to strict reviews of environmental permitting requirements. The Forest Service should on a case-by-case basis allow ridge top projects to be approved.

We realize that wind energy development in Rockingham County, Virginia, is not possible without Forest Service approval for road access and transmission corridors through areas that may be designated as not suitable for wind development under the Draft Plan.

Therefore, we request that the final revised management plan be sensitive to the private land owners in the Shenandoah Mountain community of Rockingham County, Virginia, by allowing for a special use permitting process to apply in the area surrounding our property.

Yours truly,

Turner Mountain Farm, LLC

Kay W. Bowman, Member

WVONGA
West Virginia Oil and Natural Gas Association

October 17,2011

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

Subject: Comments on EIS No. 20110174, Draft EIS, USPS

Dear Forest Supervisor,

These comments are submitted on behalfofthe West Virginia Oil and Natural Gas Association ("WVONGA") in regards to the Draft Environmental Impact Statement for the Revised Land and Resource Management Plan for the George Washington National Forest ("DEIS").

WVONGA, chartered in 1915, is one of the oldest trade associations in the state and serves the entire oil and gas industry. WVONGA members are engaged in exploration, production, transmission, storage, sales and distribution. Allied members serve the industry through drilling, pipeline construction, well service and oil field service and supply. WVONGA members have drilled, and are cmTently drilling wells in parts of the George Washington National Forest in West Virginia. We oppose the DEIS' proposal to ban horizontal drilling and hydraulic fracturing in the George Washington National Forest.

The DEIS includes as its preferred alternative, Alternative G, the prohibition of horizontal drilling for oil and natural gas. The DEIS preferred alternative bans the use of horizontal drilling and hydraulic fracturing in the George Washington National Forest **under the guise of protecting the envirom11ent and reducing community disturbance.** Hydraulic fracturing has been used for over sixty years and has a proven record of enviromnental safety when managed by the States. Horizontal drilling minimizes the surface impact of drilling activity, allowing producers to access much more resource with a significantly smaller footprint. Disallowing these technologies under their successfully regulated state regimes would have the reverse environmental effect of requiring more wells and more surface disturbance for the development of this nationally critical resource.

WVONGA requests that the final Resource Management Plan for the George Washington National Forest take in to account these concerns and allow for a preference of exploration by horizontal drilling and/or hydraulic fracturing in West Virginia, as practiced under current state regulations.

{R0640246.1}

P.O. **Box 3231 e Charleston,** West **Virginia 25332 e 304/343-1609 • www.wvonga.com**

Thank you in advance for your time and attention to my concerns.

Sincerely,

Nicholas DeMarco, xec tive Director
West Virginia Oil and Natural Gas Association
P.O Box 3231
Charleston, WV 25332
304-343-1609

Submitted October 17, 2011

October 10, 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. I am a frequent visitor to Virginia primarily because of its beautiful wilderness and outdoor spaces. My strongest desire is to have these spaces maintained so that I and thousands of others may continue to enjoy them in as pristine a state as possible.

Energy:

Biomass Incineration- Using our standing forests as a fuel source for biomass incinerators and electricity generation is a terrible idea. Because of the huge volumes of fuel-trees-and water necessary and the large amount of air pollution-fine particulates and C02-that accompany biomass incineration, the George Washington National Forest should not allow timber sales that fuel biomass incinerators.

Gas and Oil Extraction – I strongly support the prohibition on horizontal drilling in the draft plan. This will reduce the risk of serious water quality degradation and other environmental concerns associated with hydraulic fracturing. Please keep this prohibition in place.

Making more oil and gas leases available in the George Washington National Forest would lead to dangerous impacts to water quality on the forest. Hydraulic fracturing is a common practice on vertical as well as horizontal wells. The draft plan allows standard oil and gas leasing, at least in some form, on roughly 994,000 acres, or 93% of the forest. The development accompanying wells, platforms and wellheads would compromise recreation, scenic and biological resources. The forest should not make any further leases available and existing leases should be removed from lease availability when they expire.

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. 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 or further gas and oil leases on the forest.

Roadless, Wilderness, and Special Biological Areas:

The GW is one of the very few places in the eastern United States where large areas ofrelatively 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 tor 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 impmtantly, 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 entireties, 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.

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 cunent 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 impmtance 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 tor 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 macro-invertebrate 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 that the sales recoup. The George Washington National Forest Plan should be as cost effective as possible and have the lowest possible budget while maintaining existing ecological and recreational resource values.

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

Alternative C - As presented in the Draft Environmental Impact Statement, Alternative C has the lowest budget cost of all alternatives. **It** maximizes net public benefits and protects all resource values in the long term instead of liquidating them in the short term. For this reason, I request that you adopt Alternative Cas 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,

Heather R. Panek

Heather R. Panek

Betsy Shade, M.D.

October 8, 2011

George Washington National Forest
Attn: Plan Revision
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear Plam1ing Team:

These comments are submitted on your draft plan. We live within 3 hours' drive of "the GW," and we think of it as one of our finest wildland areas. My six children (ages now 12 to 16) love to visit wild country, and we all hope the magnificent lands of the GW will still be wild when they grow up and take their own children there.

The proposed plan falls far short of what's needed in protection of wilderness values. Out of 37 "potential wilderness" units totaling 372,000 acres, your plan only proposes wilderness status for four units totaling 20,000 acres. Please add wilderness recommendations in the final plan for LYIDl Hollow, Skidmore Fork, Rough Mountain, Three Ridges, Little Allegheny, and Three High Heads.

I heartily support the proposal for the Shenandoall Mountain National Scenic Area, to protect a remarkable complex ofroadless areas in the 15-mile stretch west of the Shenandoall Valley near Harrisonburg. Citizen groups have negotiated a proposal for a national scenic area of 115,000 acres, to be designated by Congress with a ban against logging and any development. There would be four new wilderness areas within the NSA: Skidmore Fork, Little River, Lynn Hollow, and Ramseys Draft Addition.

I support the Forest Service proposal to ban gas development using hydraulic fracturing (the so-called fracking). Too much is at stalce in the watershed values of the Potomac River headwaters to allow fracking in the GW.

Off-road vehicles should be restricted to existing routes. ORVs did terrible damage in the Tellico area of the Nantallala National Forest, which led the Forest Service to shut down the trails there. ln the GW, any expansion ofORV routes would interfere with other recreational activities with noise and degradation of wild character.

Thank you for considering my thoughts. I wish you well in this planning effort.

Sincerely yours,

Betsy Shade MD

12 October 2011

George Washington Plan Revision
George Washington & Jefferson National Forests
5612 Valleypointe Parkway
Roanoke, VA 24019

Dear Planners:

I have a single, simple request to make of the Planning Team. Please pay close attention to the recommendations included in the Stakeholders Agreement, Version 1.12. As you know, this document represents a year of careful discussion and hard bargaining amongst a widely representative assembly of forest users. Not everyone has endorsed the agreement. There will always be intransigent groups on the fringes, but in my forty years of following planning on the GW and Jefferson Forests I have never before seen anything approaching this degree of consensus. Treasure it by taking the recommendations seriously.

We look forward to a continuing dialog between the Forest Service and the forest users in the coming years.

Yours sincerely,

Jim Murray

J. James Murray

October 12,2011

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

SUBJECT: Comment on Wilderness and Roadless Areas in the draft Land and Resource Management Plan and draft Environmental Impact Statement for the George Washington National Forest (GW),

Dear Supervisor Hyzer,

Thank you for the opportunity to comment on the draft Land and Resource Management Plan and draft Environmental Impact Statement for the George Washington National Forest (GW).

Large areas of wilderness are essential to maintaining and enhancing biological diversity. In turn, biodiversity may hold the key to the future health of humans as well as other organisms. Also, wilderness and remote settings currently provide public benefits (clean air & water, unique recreation opportunities, etc.), as well *as* the large geographic extents on which many large species depend (e.g., black bears, bobcats, raptors).

l applaud the steps taken in the Draft Plan to protect wilderness. However, I think more needs to be done.

The entirety of all the Protected Wilderness Areas (PWA) should be protected fi-om timber sales and road construction. 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.

Also, the meager recommendations for wilderness study areas (WSA) in the draft plan are disappointing. Each of the four areas recommended are important, but three need to be increased in size. The 9000 acre recommendation for Little River should be expanded to include all 30,200 acres in its PWA. Likewise, the recommendations for 5000 acres in Rich Hole Addition should be increased to the 12,165 acre PWA, and the 6000 acres for Ramsey's Draft Addition should be increased to protect the 19,072 acre PWA.

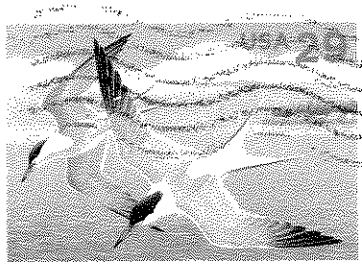
Fm1hermore, additional other areas of the GW should be designated WSA. No wilderness exists in the Lee RD, and pat1of the Big Schloss PWA should become WSA. Several other areas in the North River RD should become WSA, including Beech Lick Knob PWA and many PWA on Shenandoalh Mountain. Laurel Fork in Warm Springs RD is a truly unique and special place deserving to be WSA.

Also, 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.

Thank you for considering my comments.

Sincerely,
Mark Heinicke

MRS LUCILE H VAUGHN
APT 1
303 N 2ND ST
BRIDGEWATER VA 22812-1709



George Washington Plan Revision
5162 Valleypointe Pky
Roanoke VA 24019

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cradle to cradle CERTIFIED
TRADEMARK OF MBDC

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I wish to register my opposition to:

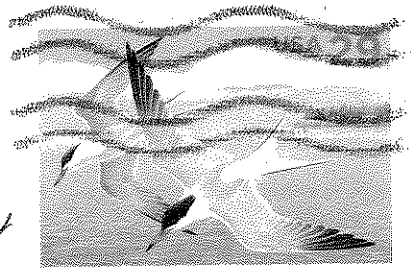
1) increased drilling
2) hydraulic fracturing
3) road building
4) old growth tree cutting

in the George Washington and Jefferson National Forests.

"All of creation God gives to humankind to use. If this privilege is misused, God's justice permits creation to punish humankind."

Hildegard of Bingen

CJ. Churchman
3619 Mallard Drive
Bridge water VA
22812



George Washington &
Jefferson National Forest
5162 Valleypointe Parkway
Roanoke VA. 24019

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Please support the Friends
of Shenandoah Mountain
proposal to ban the
horizontal drilling for gas and
maintain the ban for this
horizontal drilling.

Charles J. Shuetman

Alexis Rodriguez, JR.
243 Vine St # 206 2PM
Harrisonburg, VA 22802

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

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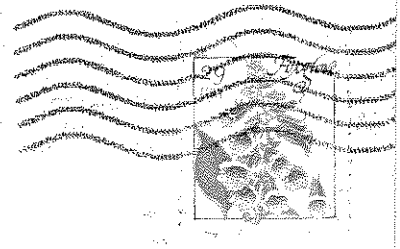
To the management of the George Washington National Forest:

I want the Forest to stay a forest for when I grow up. I want the clean water air, and land to still be clean. Don't take away the animals place to live. Don't make holes for bad things out of. No Drilling!

Thank you for your time

Geraldine Quayle RICHMOND VA 232
243 Vine St. #202
Harrisonburg, VA 22802

04 OCT 2011 PM 1 T



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

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To the management of the George Washington National Forest:

I support the ban on horizontal natural gas drilling. Keep the air clean with no increased traffic pollution or gas venting pollution. protect our drinking water in the Shenandoah Valley. No clear cuts, No new roads causing sedimentation Contamination + preserve our fish and wild life habitat. Keep our forest a forest. heighten security on vertical gas drill to also protect air, water, and land.

Thank you for your time

Thanks.

10-6-11

Please keep the gas companies out of the GWNF. When I grow up I want the forest to be a forest and our water to be clean. The wild animals need the trees and bushes to live and eat. Please dont let them drill for gas here!

Geffrey Simmons
2nd grader in
Falks Run, VA

Date 10-9-1

I learned in the DO proceeds Academy. Please keep our George Washington National Forest a forest and keep our water clean. Don't let the gas company mess up our water and air and forest with lots of trucks and bad stuff. Please don't cut down the trees and bushes for gas drilling. Our wildlife need their habitats and food. Don't allow gas drilling at all! Thank You.

Anthony Simmons

Fourth Grader from Fulks Run VA

TO:

G.W.N.F.
5162 VALLEYPOINTE
ROANOKE 24019

FROM:

2000 COVE CRK. RD.
COVINGTON 24426
OCTOBER 1, 2011

RE: FOREST PLAN REVISION - URGED BY RACHEL JOHNSON, member: SIERRA, WILD VA, VA FOREST WATCH

PLEASE DO THE FOLLOWING:

= PROTECT ALL NEWLY-IDENTIFIED ROADLESS AREAS

= INCREASE PROTECTION FOR ALL POTENTIAL WILDERNESS AREAS TO 100%

= REDUCE AMOUNT OF AREAS "SUITABLE FOR TIMBER PRODUCTION" FROM 41% OF ENTIRE N.F. TO 15%

= DECREASE BIOMASS FUEL LOGGING, OIL, AND GAS LEASING - TOO DAMAGING TO ECOSYSTEMS.

= REDUCE PRESCRIBED BURNS - HORRIFIC FOR WILDLIFE

= DE-COMMISSION 50% OF F.S. ROADS

Oct. 11, 2011

G.W.N.F.
Forest Plan Revision

Gentlemen:

We are landowners near Criders, VA that is nearly surrounded by the GWNF. the ridgeline of the mountain is ideal for wind energy development. Your plan has designated certain areas as unsuitable for wind development.

We request that you allow wind projects to be evaluated on an individual basis. Road access & transmission lines through GWNF would be needed if wind turbines were built on private land.

Since your proposed plan is for 15 years, it would be wise to keep your options open on wind energy development. Wind energy could play an important role in the nation's energy independence.

thank you for your consideration.

Sincerely,

Shane & Evelyn Wilkins
3673 Brenneman Church Rd.
Harrisonburg VA 22802

George Washington National Forest
Forest Plan Revision
5162 Valleypoint Parkway
Roanoke, Va. 24019
Oct 12, 2011

Dear Sirs,

I have private property on a ridge top in the Cow Knob area of Rockingham County. My land is completely surrounded by National Forest land.

Our community strongly supports wind energy, and I am aware that the ridge top where I am located has great potential for wind energy development. I understand that the Forest Service has released a Draft Plan that proposes certain areas surrounding my property as not suitable for wind development. I realize that wind development on my land is not possible without Forest Service approval for road access and transmission corridors through areas of the GWNF that may be designated as not suitable for wind development. I request that the final management plan be sensitive to private land owners in my community by allowing for the special use permitting process to apply in the area surrounding my property.

Respectfully Submitted
James A. Shank

October 17, 2011

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

Dear Ms. Hyzer:

We, the undersigned, stakeholders of the George Washington National Forest organized in September 2010 to learn from each other, listen to perspectives different from our own, and attempt to build consensus around a suite of issues that have traditionally been contentious and polarizing. Representing a range of interest groups from the forest products industry, conservation organizations, private forestry consultants, state wildlife agencies, recreational organizations, and sportsman groups, we all have a deep appreciation and connection to the Forest and recognize that on-going collaboration presents the best opportunity to collectively fulfill all of our goals. After twelve months of dialog, we have agreed upon the following concepts and welcome this opportunity to provide comments on the Forest's Draft Land and Resource Management Plan (Draft Plan).

Vision

We envision a well-connected network of core, relatively unfragmented, forested areas embedded within a landscape of diverse age and structural character that supports a variety of wildlife species, builds ecological resilience, and provides essential ecological, social, economic, and recreational benefits for people.

Land Allocations

Core areas should be allocated to congressional and administration designations which favor maintenance of native plant communities by late successional dynamics and ecological disturbances such as ice storms, wind, and fire. Such designations should serve to avoid stressors and activities such as road construction, wind energy development, and oil and gas leasing, while also minimizing impacts to existing forest users and access (e.g., mountain bikers, hunters).

To assemble this network of core areas, we recommend the following areas be considered for specific congressional or administrative designations:

1) Little River – approximately 12,600 acres for Wilderness Study Area,

2) Rich Hole Addition – approximately 8,200 acres for Wilderness Study Area,
3) Rough Mountain Addition – approximately 1,900 acres for Wilderness Study Area,
4) St. Mary's West – approximately 300 acres for Wilderness Study Area,
5) Ramsey Draft Addition (aka Bald Ridge and Lynn Hollow) – approximately 9,300 acres for Wilderness Study Area, also to include an adjustment of the Ramseys Draft Wilderness boundary to allow access by appropriate non-motorized wheeled vehicles, such as mountain bikes and hunting carts, to Shenandoah Mountain Trail,
6) Beech Lick Knob – approximately 6,200 acres for Wilderness Study Area,
7) High Knob (aka Skidmore Fork) – approximately 5,200 acres for Wilderness Study Area,
8) Three Ridges Additions – approximately 370 acres for Wilderness Study Area, and
9) Gum Run/Oak Knob/Hone Quarry/North River Gorge (aka Shenandoah Mountain) – approximately 55,000 acres for National Scenic Area.

For the areas on Shenandoah Mountain recommended for National Scenic Area, we support language similar to that used in the Virginia Ridge and Valley Act, with the following clarifications:

a) Allow building of trails for non-motorized use (use of mechanized equipment for construction and maintenance as necessary), with locations mapped prior to legislation.
b) Allow for creation of new wildlife openings of approximately 2 to 5 acres each, near existing system roads, with locations mapped prior to legislation. The number of openings and their locations should be determined at the project level using input from stakeholders.
c) Allow maintenance of existing wildlife openings and waterholes, with locations mapped prior to legislation.
d) Allow controlled burns, including ability to build/maintain temporary fire lines along existing roads, trails, old roadbeds, utility ROWs, and wildlife openings while minimizing creation of new dozer lines.

For areas recommended for Wilderness Study Area listed above, we support management prior to congressional approval under the Recommended Wilderness Study Area management area prescription defined in Alternative G of the Draft Plan.

We recommend that all Inventoried Roadless Areas not allocated to a congressional designation be designated as Remote Backcountry and managed consistent with the 2001 Roadless Area Conservation Rule.

For the remaining Potential Wilderness Areas, we recommend allocation to Mosaics of Habitat, with the following exceptions discussed by the Small Working Group:

1) Signal Knob, portions west of the Northern Massanutten Inventoried Roadless Area, and portions of eastern Duncan Knob should be designated as Remote Backcountry (or similar management area),
2) A 908-acre portion of Crawford Knob east of the Inventoried Roadless Area should be designated as Remote Backcountry,
3) A 4,923-acre portion of Archer Knob west of the ridge should be designated as Remote Backcountry, and
4) A 2,862-acre portion of Kelly Mountain east of the Inventoried Roadless Area should be designated as Remote Backcountry.

We recommend that any Potential Wilderness Areas allocated to Mosaics of Habitat or other management areas which allow road construction limit new roads to temporary ones where location and closure will be determined at the project level. Decommissioning of roads should also take into consideration the need for access to meet future habitat management goals. This land area remains available for timber harvesting, controlled burning, and other wildlife habitat development practices. Maintenance of existing or newly created wildlife openings and waterholes will be allowed. All parties interested in specific projects are encouraged to attend the planning meetings for those projects.

We recognize that there are or will be other management area prescriptions within these Potential Wilderness Areas (e.g., Special Biological Areas, Shenandoah Mountain Crest/Cow Knob Salamander Areas, etc.), and we do not intend for our recommendations to conflict with those prescriptions.

Tiers of Management

Limited management intervention in core areas will serve to restore ecological processes, mimic natural disturbances, and maintain existing access through controlled burns, invasive species control, and trail construction and maintenance.

Outside of core areas, management activities such as timber harvest, firewood harvest, wildlife openings, waterholes, controlled burns, and other applicable habitat management techniques will primarily serve to promote ecological restoration by: 1) promoting oak reproduction, 2) enhancing habitat conditions for declining early successional species and other Species of Greatest Conservation Need in Virginia/West Virginia, and 3) restoring low diversity stands and systems severely altered from their historic range of variability (e.g., stands <40 years old, systems converted to white pine plantations, fire-dependent systems).

To support jobs in rural communities and help address the habitat needs of wildlife species that require early successional, young forest habitat we collectively support an increase in timber harvesting. However, the various stakeholders could not come to agreement on the desired level of timber harvest, so to meet these objectives while recognizing the fiscal constraints of the agency, we support different ranges of timber harvest. Some members are able to support a timber harvest range of 18,000 to 35,000 acres over ten years occurring throughout Mosaics of Habitat and other management areas available to timber harvest. And those members also agree to work toward the higher end of that range, and advocate that the agency not settle on the lower limits. Other members prefer a timber harvest range of 35,000 to 45,000 acres over ten years which would allow lands available for timber harvest to be managed on a 100-year rotation. We agree that different types of timber stands will be considered eligible for harvest, including trees 80 years or older and we support the use of Region 8 old growth guidelines for determining such eligibility.

We also support a range of 12,000 – 20,000 acres/year of controlled burning. Disturbances by fire result in habitat changes that differ from those created by timber harvesting, and should be used in conjunction with an active timber harvesting program. We also support the use of fire in areas not suitable for timber production unless habitat objectives dictate otherwise. Guidelines for controlled burns should allow for burning under growing season conditions in order to achieve desired habitat results.

Collaborative Process

Before and after a land and resource management plan is finalized, this group plans to continue our dialog and strive to find mutually beneficial, positive solutions that are best determined at the project level. To successfully achieve many of the goals listed above and others determined by the agency, we recognize the continued need to build trust, not only between stakeholders, but with the agency as well. We also extend a standing "open door" invitation to additional stakeholders who have not signed this document, but who wish to work collaboratively with us. We propose an incremental, consensus decision-making process that would involve collaborative project development, implementation, and monitoring in one geographic area at a time.

Specifically, we recommend identification of focal areas or opportunity areas which incorporate project activities involving multiple resources or interests. We envision that this group, or a smaller working group, would convene with the agency prior to any environmental analysis and, using the best available science and innovative technology, begin to develop recommendations for project activities. Projects may include trail construction and maintenance including use-specific trailheads and sustainable stacked loop trail systems, timber

harvest, controlled burning, stream restoration, development of wildlife openings, non-native invasive species control, road decommissioning, and/or other activities, any of which may not necessarily be implemented on the same acreage, but within a defined geographic area (e.g., watershed). The group would only recommend projects that were developed through a consensus decision-making process, the specifics of which would be determined at that time, but with the minimum understanding that consensus means that all participating stakeholders could support or at least would not oppose the recommended project. Later, the group would seek to work actively and collaboratively with the Forest Service as the agency analyzes and implements the project.

Our goal is to preclude the typical conflicts that arise during project development and avoid project appeals and litigation. Each organization within the group would also determine what they could contribute (e.g., financially, in-kind, analysis, monitoring, congressional advocacy, or simply verbal support) and as a group, determine and help seek funding opportunities available and pertinent to the project concept (e.g., stewardship contracting, Collaborative Forest Landscape Restoration Program, Priority Watersheds Program).

After the environmental analysis is completed and enough stages of each project have been implemented to demonstrate measurable progress towards collaborately-developed and agreed upon objectives, the group would then begin building additional support for the legislative process necessary to implement any congressional designations supported by the stakeholders in this agreement or in future stakeholder agreements in the same geographic area. While the Forest Service is the ultimate arbiter of its forest plan's recommendations for congressional designations and timber harvest, the group views its support of both as a package deal and agrees that any congressional designation would be explicitly linked to implementation of on-the-ground activities.

Conclusion

Again, we appreciate the opportunity to work with the Forest on this revision of its land and resource management plan. We also greatly appreciate your support for and attendance at stakeholder group meetings and hope we can continue this important collaboration.

Endorsed By:

Laura Neale

Name: Virginia Wilderness Committee

Organization: Laura Neale

Marek Smith

Name: MAREK K. SMITH

Organization: THE NATURE CONSERVANCY

Name: Chris Scott

Organization: Shenandoah Mountain Touring

John M Hancock

Name: John M. Hancock

Organization: Virginia Forestry Association

Name:

Organization: Virginia National Wild Turkey Federation

Thomas Jenkins Lynn Cameron

Name: Thomas Jenkins Lynn Cameron

Organization: Friends of Shenandoah Mountain

Graham Simmerman Jr

Name: GRAHAM SIMMERMAN

Organization: Virginia Council of Trout Unlimited

Mark Miller

Name: Mark Miller

Organization: Southern Appalachian Forest Coalition

Name: A. J. PHAUP

Organization: GREIF PACKAGING LLC

Marvin Q. Tinsley

Name: M. Q. Tinsley

Organization: Mount Pleasant Forestry, LLC

Name: BUD WATSON

Organization: VIRGINIA FOREST WATCH

Name: J. Murray

Organization: Virginia Wilderness Committee

Name: Kyle Lawrence

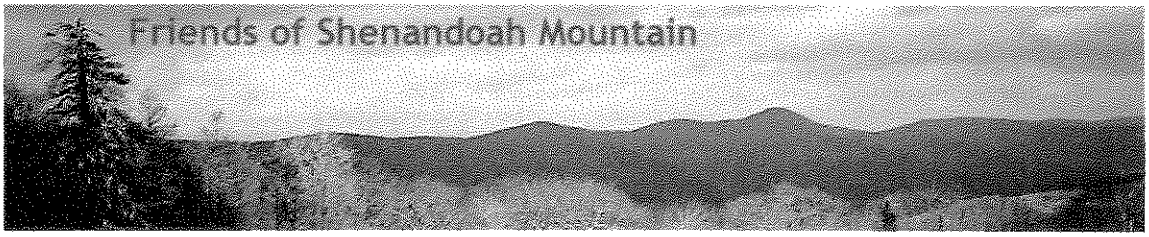
Organization: Shenandoah Valley Bicycle Coalition

Name:

Organization:

Name:

Organization:



September 30, 2011

GWNF Stakeholders Group
Mark Miller, Al Bourgeois, Marek Smith, and John Hancock

Dear Mark, Al, Marek, and John,

Friends of Shenandoah Mountain is pleased to sign on to the Consensus Agreement for the George Washington National Forest. As participants this past year in meetings, fields trips, emails, and other discussions that led up to the Consensus Agreement, we were grateful for the opportunity to express our vision for protecting special places on the George Washington National Forest, and even more important, for the opportunity to listen and learn from others. As the year went by, we came to realize that our goals for the National Forest are compatible and that working together will help all of us make progress toward achieving our respective goals. Of course, compromise was necessary. In the case of the Shenandoah Mountain Proposal, we modified the proposed National Scenic Area boundaries in order to satisfy game and timber interests above Union Springs, on Leading Ridge, in the Dowells Draft area, and on Narrowback Mountain, and reduced the proposed Lynn Hollow Wilderness boundary to allow increased access to Sinclair Hollow Trail. This compromise was a win-win from our perspective because core areas that had the most outstanding wild character and recreational value were protected, and management activities could occur around the periphery. Another compromise was to accept management as Remote Backcountry for the proposed Kelley Mountain-Big Levels National Scenic Area rather than Congressional designation.

Of course there are some areas we may never agree on, like Laurel Fork. Friends of Shenandoah Mountain would like to see the area permanently protected; whereas others would prefer to manage the area. We are satisfied that the group chose the course of agreeing to disagree on this special area.

Although it is not stated explicitly in the Consensus Agreement, it is our understanding that any legislation for the proposed Shenandoah Mountain National Scenic Area with embedded Wilderness areas would include an adjustment of the Ramseys Draft Wilderness boundary to allow access by appropriate nonmotorized wheeled vehicles, such as mountain bikes and hunting carts, to Shenandoah Mountain Trail.

Friends of Shenandoah Mountain appreciates the leadership role that the four of you played. We have collectively accomplished an agreement that seemed impossible. The next step is to keep our promises and support the process. We are committed to taking an active role in project level planning. It will be exciting to see what we can accomplish working together both in terms of increasing timber harvest, improving habitat for species that need an early successional forest, and gaining permanent protection of our most special places.

Thank you.

Sincerely,

Lynn Cameron
Co-Chair
5653 Beards Ford Rd.
Mt. Crawford, VA 22841
(540)234-6273
slynncameron@gmail.com

Thomas Jenkins
Co-Chair
375 E. Wolfe St.
Harrisonburg, VA 22802
(540) 437-9000
tj@shenandoahbicycle.com

Mark Miller

From: BumCW@aol.com

Sent: Friday, October 14, 2011 4:52 AM

To: mmiller@rockbridge.net

Cc: Al.Bourgeois@dgif.virginia.gov; jay.jeffreys@dgif.virginia.gov; cliffandoma@ntelos.net; marek_smith@TNC.ORG; john.hancock@mwv.com

Subject: Re: Consensus agreement

Mark, et al.

I'll sign for the James River Chapter, Ruffed Grouse Society -- back on 23rd of October.

Wayne Thacker
804-357-9448 (c)

"The moon put her hand over my mouth and told me to shut up and watch."
Either Jim Harrison or Ted Kooser in Braided Creek

Mark Miller

From: Jeremy Fancher [jeremy.fancher@imba.com]
Sent: Friday, October 14, 2011 12:23 PM
To: Marek Smith; mmiller@rockbridge.net
Cc: Richard Edwards; Frank Maguire
Subject: George Washington National Forest Stakeholder Group Consensus Agreement and Comments on the Draft Plan
Attachments: ConsensusAgreementEndorsementForm (2).doc; ATT00059.htm

Marek and Mark,

Please sign IMBA on as a participant to the Consensus Agreement. The signatory for IMBA will be Frank Maguire, Mid Atlantic Regional Director. He is currently on vacation but he will complete the form and send it to you when he returns. We look forward to furthering our common goals as the process moves forward.

Best Regards,
Jeremy Fancher

Jeremy Fancher
IMBA Policy Analyst/In-House Counsel
jeremy.fancher@imba.com
303.250.0720

What is IMBA building near you?
Check out the map and support the Trail Building Fund today!

October 17, 2011

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

Dear Ms. Hyzer

In addition to the groups and organizations that signed onto the stakeholder document several other groups and organization that we not at the table have expressed support for the document. Their letters of support are attached.

Mark Miller
Sothern Appalachian Forest Coalition

Marek Smith
The Nature Conservancy

John Hancock
Virginia Forestry Association

Consensus Agreement
For Management of the George Washington National Forest
Endorsement

This is an endorsement of the Final Consensus Agreement of the George Washington National Forest Stakeholders Group, Version 1.12, dated September 12, 2011.

Endorsing organization:	Virginia Society of Ornithology
Authorized officer/owner:	Stephen D Eccles
Position:	Chair, Conservation Committee
Email:	stephendeccles@gmail.com
Address;	8904, Narem Place Annandale, Va. 22003
Signature:	_____
Date:	October 13, 2011

Please return signed form to:

Marek Smith
Allegheny Highlands Program of The Nature Conservancy
12181-A Courthouse Hill Road Warm Springs, VA 24484

Or email to:

marek_smith@tnc.org

Presbyterians for Earth Care
AN ECO-JUSTICE NETWORK

Earth Care House Church

Trinity Presbyterian Church
725 South High Street
Harrisonburg, VA 22801
Ph 540.434.9556

PRESBYTERIAN CHURCH (USA)

October 14, 2011

Marek Smith, The Nature Conservancy
John Hancock, Virginia Forestry Association
Al Bourgeois, Virginia Department of Game and Inland Fisheries
Mark Miller, Southern Appalachian Forest Coalition

Gentlemen:

Trinity Presbyterian Earth Care House Church, which is based in Harrisonburg, has an interest in how the George Washington National Forest is managed because we see God's creation expressed in a very full sense in the wide variety of species (plant and animal) that call the George Washington National Forest home. We believe that it is our responsibility to take care of God's good creation and protect the habitat where these species thrive. Also, the GWNF is the source of our municipal drinking water, and we enjoy taking our youth and members of all ages on outings in the National Forest.

We are also interested in peacemaking. We have heard about the GWNF stakeholders group that has been meeting for the past year, and we have seen the Consensus Agreement. We would like to commend you for coming together, exchanging ideas, finding common ground, and coming to agreement.

We have endorsed the Shenandoah Mountain Proposal and would like to see the area permanently protected. We accept the compromises that have been made in relation to the boundaries of the proposal. While we place a high value on clean water, wildlife habitat, and recreation, we also use paper, building materials, furniture, firewood, and other forest products. We applaud the stakeholders group for finding a balance between protecting special places and management activities that involve harvesting timber.

Thank you for the good work you have done. We hope the GWNF will incorporate the Consensus Agreement into the new plan.

Sincerely,

Ronda Baer
Mission Leader
Trinity Presbyterian Earth Care House Church

Southern Shenandoah Valley Chapter
Potomac Appalachian Trail Club

September 29, 2011

Mark Miller, John Hancock, Al Bourgeois, and Marek Smith
GWNF Stakeholders Group

Dear Mark Miller, John Hancock, Al Bourgeois, and Marek Smith,

The Southern Shenandoah Valley Chapter of Potomac Appalachian Trail Club is based in the Staunton-Harrisonburg-Waynesboro area. We have been involved in the development of the Friends of Shenandoah Mountain Proposal and strongly endorse permanent protection of the Shenandoah Mountain area from Rt. 250 to Rt. 33. Shenandoah Mountain, with its network of 150 miles of trail, is where our local chapter hikes the most. Chapter members maintain several trails in the area, including North River Trail, Shenandoah Mountain Trail from 250 to the intersection with Ramseys Draft Trail, and Grooms Ridge Trail. We are currently helping to write a guidebook to trails in the Shenandoah Mountain area.

The Shenandoah Mountain area has been important to PATC historically dating back to the late 1920s when the club scheduled hikes in the Reddish Knob – Ramseys Draft area. Based in Washington, D.C., club members would make the long journey over bad roads in a bus to visit this beautiful area. Myron Avery, who was President of the PATC from 1927-1941, said the Shenandoah Mountain Trail was one of his favorite trails anywhere. It still remains a favorite of many.

Our board has read the final George Washington National Forest Stakeholders Consensus Agreement and want to endorse it. We appreciate the approach you have taken to bring together diverse interests and reach a compromise. We believe the boundary adjustments that the consensus agreement makes to the proposed Shenandoah Mountain National Scenic Area are reasonable and still leave the most important areas in the proposal while allowing management for wildlife around the periphery in areas where management has historically been done. We support the increase in timber and management activities that the agreement recommends.

We were sorry that the stakeholders could not agree to permanent protection of Laurel Fork and Kelley Mountain-Big Levels, both areas that are important to our chapter, but we realize that compromise involves giving up some of what you want.

Our Chapter also supports the agreement on Beech Lick Knob. We are helping to build the Carr Mountain Trail, which will eventually be a segment of the Great Eastern Trail. We are doing this in cooperation with mountain bikers and horseback riders. We think the compromise of having some Wilderness on Beech Lick Knob and allowing management in certain areas is very reasonable. Since much of the Great Eastern Trail

in Virginia is shared use, it is good that the Carr Mountain Trail is outside the Wilderness boundary.

We believe that this compromise protects high value areas on Shenandoah Mountain and Beech Lick Knob that we care the most about while allowing multiple use of the National Forest, and we want to express our appreciation for your role in bringing people together to make this happen.

If there is an opportunity for our Chapter to participate in the collaborative process at the project level, we would welcome the opportunity to do so.

Sincerely,

Karen Waterman
President
Southern Shenandoah Valley Chapter of PATC
229 Cranberry Drive
Stuarts Draft, VA 24477-3047

Consensus Agreement
For Management of the George Washington National Forest
Endorsement

This is an endorsement of the Final Consensus Agreement of the George Washington National Forest Stakeholders Group, Version 1.12, dated September 12, 2011.

Endorsing organization:Back Country Horsemen of Virginia.

Authorized officer/owner: Deborah J. Sensabaugh (print)

Position: state chairman

Email : deborasensaba@gmail.com_____

Address: 55 Lost Creek Lane
Buena Vista, VA 24416

Signature: *Deborah J. Sensabaugh*

Date : Oct. 13, 2011

Please return signed form to:

Marek Smith
Allegheny Highlands Program of The Nature Conservancy
12181-A Courthouse Hill Road Warm Springs, VA 24484

Or email to:

marek_smith@tnc.org

Comments of the Virginia Native Plant Society on
The Draft Revised Land and Resource Management Plan and EIS for the
George Washington National Forest

The Virginia Native Plant Society (VNPS) is a statewide organization whose purpose is to further appreciation and conservation of Virginia's native plants and habitats. Our members are nearly 2,000 strong across the Commonwealth of Virginia. Our highest priority is to conserve our native flora. The following are our comments on the April 2011 Forest Plan Revision and EIS.

Two thirds of the more than 3,000 native vascular plants in Virginia can be found in the George Washington National Forest?s vast and mountainous terrain. This extraordinary biodiversity is arrayed in numerous ecological communities to form over a million acres of habitat for wild creatures from mammals to birds to insects. As the global climate crisis changes their habitats, those creatures need the corridors and watersheds of the Appalachian chain just to survive as they migrate northward along with the changing plant life.

We are pleased with the Forest Service?s plan to maintain or increase populations and occurrences of northeastern bulrush, swamp pink, Virginia sneezeweed, shale barren rockcress, and smooth coneflower through protection and maintenance of existing sites.

We are also pleased that the Forest Service intends to continue to cooperate with the Virginia Natural Heritage agency to make appropriate adjustments to ?Management Prescription Area 4D-Special Biological Areas? through the Forest Plan amendment process as new rare community location and management information becomes available, as well as to maintain records of rare community locations and conditions across the forest. Project areas are to be surveyed for rare communities prior to implementing projects that have the potential to negatively affect them.

We are pleased with the designation of Key Natural Heritage Community Areas including Frozen Knob and Peters Mountain.

We applaud the Forest Service for its ban on horizontal hydrofracturing.

The Virginia Native Plant Society endorses the September Consensus Agreement (CA) of the stakeholders group. We commend the spirit of cooperation of that group. We are extremely pleased that many of the areas that we had concerns about would be protected if the CA recommendations are accepted by the U.S. Forest Service.

We are particularly supportive of the recommendations of the stakeholders for congressional or administrative designations for the network of core areas including protections for the Shenandoah Mountain Area and the Kelley Mountain SBA designation.

We strongly support the CA recommendations for increased wilderness protections and the recommendation that all Inventoried Roadless Areas not allocated to a congressional designation be designated as Remote Backcountry and managed consistent with the 2001 Roadless Area Conservation Rule.

However, we do have some remaining concerns which are outlined below:

- Our highest priority is the protection of all of the Special Biological Areas proposed by Virginia Division of Natural Heritage.

- We continue to believe that the U.S. Forest Service should protect all areas identified in the Virginia's Mountain Treasures publication by designating them as unsuitable for timber harvest, new road building and surface-occupying oil and gas drilling.

- We are concerned that the revised plan does not adequately protect the entire Peters Mountain North area identified as old growth by Virginia Division of Natural Heritage.

- We strongly support wilderness designation for Laurel Fork and Three Sisters.

- We do have concerns about those Potential Wilderness Areas that would be allocated to ?Mosaics of Habitat.? While we support habitat management for declining species, disturbances in those areas would make them vulnerable to invasion by exotic species. We strongly support the proposed National Forest System Invasive Species Management Policy and look forward to its final publication and implementation.

Submitted by
Sally Anderson
President
Virginia Native Plant Society

Consensus Agreement
For Management of the George Washington National Forest
Endorsement

This is an endorsement of the Final Consensus Agreement of the George Washington National Forest Stakeholders Group, Version 1.12, dated September 12, 2011.

Endorsing organization International Mountain Bicycling Association

Authorized officer/owner Jeremy Fancher
(print)

Position Policy Analyst/In House Counsel

Email jeremy.fancher@imba.com

Address PO Box 7578, Boulder, CO 80306

Signature Jeremy Fancher

Date 10/17/2011

Please return signed form to:

Marek Smith
Allegheny Highlands Program of The Nature Conservancy
12181-A Courthouse Hill Road Warm Springs, VA 24484

Or email to:

marek_smith@tnc.org

Consensus Agreement
For Management of the George Washington National Forest
Endorsement

This is an endorsement of the Final Consensus Agreement of the George Washington National Forest Stakeholders Group, Version 1.12, dated September 12, 2011.

Endorsing organization ___Shenandoah Riverkeeper_____

Authorized officer/owner __Jeff Kelble_____
(print)

Position ___Riverkeeper_____

Email ____jeff@shenandoahriverkeeper.org_____

Address ____102 East Main Street_____

___Boyce, VA 22620_____

Signature _____ Jeff Kelble _____

Date ___10/17/2011_____

Please return signed form to:

Marek Smith
Allegheny Highlands Program of The Nature Conservancy
12181-A Courthouse Hill Road Warm Springs, VA 24484

Or email to:

marek_smith@tnc.org

Overcash, Karen

From: Brown, JoBeth
Sent: Wednesday, August 31, 2011 4:32 PM
To: Overcash, Karen
Subject: FW: National Forest Road use- Public Comments

JoBeth Brown
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019
(540) 265-5102

From:
Sent: Wednesday, August 31, 2011 4:29 PM
To:
Cc: Brown, JoBeth
Subject: RE: National Forest Road use

Mr. Byer,

Thank you for your comments, and I am copying them to the Forest Service so they can be entered into the public **comment** record.

Angie Hall
Field !Representative
Congressman Morgan Griffith VA-09
17 West Main St.
Christiansb tug, VA 24073
(540)301-5671
(540) 381-5675 fax

From:
Sent: Wednesday, August 31, 2011 10:55 AM
To:
Subject: National Forest Road use

I would like to thank Congressman Griffith and you for your time and effort to meet with the residents of the Covington area. I feel that closing the 160 miles of national Forest roads in our area is not appropriate at all !

If the roads are closed it will:

1. Eliminate allot of recreational land use by all.

2. Especially limit the use of the land by older or handy capped people.

3. Will cause disease and over population of wildlife, due to no harvesting.

4. Will cause over harvesting of wildlife in the areas of National Forest that are access able with the closed roads.

5. Create hazardous hunting conditions in the areas of National Forest that are accessible with the closed roads due to many more people hunting in the smaller accessible areas.

6. Will limit the ability to harvest downed and dead wood for home heating.

7. Will limit the ability of the Forest Service to harvest timber.

8. Will cause disease in the forest timber due to the old growth trees not being harvested.

9. Will eliminate allot of mountain streams from the fishermen to use.

10. Will decrease the number of National Forest Stamps sold due to the lack of use of the properties.

11. Will increase tresspass issues on private property with people crossing private land to access the National Forest.

12. Will Decrease revenues and local taxes from visitors to use the National Forest, due to the inaccessibility to the forests.

13. Will limit the area to advertise as a recreational destinaiion and further reduce income in the area.

I feel that any road that is closed must be set up as a Four wheeler / mountain bike trail to grant access to the forest area affected.

This Will:

1. Allow the public access to the affected property.

2. Increase tourism in the area.

3. Increase business in the area. (motels, restaurants, camping facilities, gas stations, cycle sales and repair shops)

4. Increase tax revenues for the localities. (gas, food, motel taxes, new 4 wheeler and cycle sales tax)

5 Allow older and handicapped people access.

6. Create an atmosphere of corporation between the public and National Forest personnel.

Please let me know if there is anything I can do to help in this endeavor to keep our forests and mountain streams open and accessible to the public.

Respectfully,

Carl W. Byer