

August 4, 2011

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

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

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

Riparian areas in the priority and public 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 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 public 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 of road decommissioning during the first decade of the new plan should be increased.

Finally, 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.

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

