



October 17, 2011

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

Dear Planning Team:

Our comments focus on how the draft plan addresses the Shenandoah Mountain Proposal which is described fully in our letter to the GWNF, dated October 30, 2008. As you know, wilderness advocates, mountain bikers, hikers, hunters and fishers developed the Proposal collaboratively. During the past three years, 84 businesses, 53 organizations, and 12 faith groups have endorsed the Proposal (See attached lists). These endorsements show broad support by diverse interests in the Shenandoah Valley and beyond. Our endorsers see the Shenandoah Mountain Proposal as being good for water quality, recreation, wildlife habitat, tourism, and scenic beauty. If enacted by Congress, the Shenandoah Mountain Proposal would offer permanent protection of one of the most special natural areas in the Eastern United States.

Beginning in August of 2010, Friends of Shenandoah Mountain has played an active role in the GWNF Stakeholders group. During numerous meetings and field trips, conservationists, preservationists, recreationists, game managers, and timber industry representatives exchanged views, listened and learned from each other. The result of this process of negotiation and compromise was a Consensus Agreement (CA). This agreement calls for several modifications to the Shenandoah Mountain Proposal. We support the CA recommendations for protection of special core areas on Shenandoah Mountain, an increase in timber harvest forest wide, and improvements in habitat for species that need an early successional forest. We think it makes sense to work together at the project level, and we are committed to taking an active role in project level planning.

Given the compromises that were made by all who participated in developing the CA, we are submitting modified boundaries for the Shenandoah Mountain Proposal, as shown on the attached map. We ask that you recommend the following protections in addition to Little River Wilderness and Ramseys Draft Wilderness Addition:

- **Shenandoah Mountain National Scenic Area**, with adjusted boundaries that would exclude:
 - a grouse management area on Hankey Mountain;
 - the Leading Ridge/North River triangle;
 - Narrowback Mountain;
 - a strip on the west side of Tilghman Road; and
 - a previously managed area above Union Springs.

Some of these areas have historically been managed, and VDGIF would like to continue to manage for species that need early successional habitat by cutting timber in these areas.

- **Skidmore Fork Wilderness** – (old growth forest, rare species, Harrisonburg’s municipal watershed) Note that we support liming of Skidmore Fork if it should be deemed necessary.
- **Lynn Hollow Wilderness** – with adjusted boundaries to allow increased access to Sinclair Hollow Trail

We also want to reiterate our support for a boundary adjustment to Ramseys Draft Wilderness to allow appropriate nonmotorized vehicles, such as mountain bikes and game carts, to have access to the Shenandoah Mountain Trail.

Friends of Shenandoah Mountain believes that the compromises we made strengthened our proposal and allowed for a balance between protecting our most special core areas, maintaining access for recreation, and allowing for management around the periphery of the core areas to meet wildlife objectives, particularly for grouse, turkey and deer.

We were disappointed that not all of the Stakeholders Group could agree to Wilderness designation of Laurel Fork and National Scenic Area designation of Kelley Mountain-Big Levels. We agreed to disagree on Laurel Fork. We want to thank you for making Laurel Fork unavailable for gas leasing. We continue to believe that Wilderness designation is appropriate for Laurel Fork because of its outstanding natural characteristics, its productive trout stream, and also because of the threats of gas development and industrial wind that could be in its future after this plan’s life is over. Energy pressures will be even greater then as our population grows and resources become scarcer.

Regarding Kelley Mountain-Big Levels, we are grateful that you have made it a Special Biological Area (SBA) in the plan. We would have preferred a permanent designation for this popular recreation and natural area, but SBA and Dispersed Recreation management offer protection for at least the next 15 years.

As we have talked with organizations, businesses, and faith groups, one of the main concerns we have heard about the future of Shenandoah Mountain is that it will be developed for gas using the method called hydrofracking. We applaud the ban on horizontal drilling, but we are concerned that there will be a great deal of pressure to lift the ban, sooner or later. We ask that when you recommend Shenandoah Mountain National Scenic Area and Wilderness areas, that you make the areas unavailable for gas leasing where the rights are publicly owned. This would keep greater Shenandoah Mountain between Rt. 33 and Rt. 250 safe from gas development until Congress enacts National Scenic Area and Wilderness legislation.

Thank you for the opportunity to comment.

Sincerely,

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Attachments:

- Map of Shenandoah Mountain National Scenic Area with Wilderness Areas showing adjusted boundaries

- List of business, organization, and faith group endorsers of the Shenandoah Mountain Proposal