



April 22, 2010

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

Dear Planning Team:

I am writing on behalf of Friends of Shenandoah Mountain, a local coalition based in the Shenandoah Valley, formed to work for permanent protection of Shenandoah Mountain, Laurel Fork and Kelley Mountain-Big Levels. We wish to resubmit our comments dated October 30, 2008 (see attachment). Our comments provide details about our proposal to make a) Shenandoah Mountain between Rt. 250 and Rt. 33 a National Scenic Area with core areas within designated as Wilderness; b) Laurel Fork a Wilderness area, and c) Kelley Mountain – Big Levels a National Scenic Area.

The Shenandoah Mountain Proposal was developed as a collaborative effort involving diverse national forest user groups and others who care about the areas and the many benefits they provide. We are attaching a list of businesses, faith groups, and organizations that have endorsed the Shenandoah Mountain Proposal as of April 17, 2010. Please note the diversity of groups represented on this list. The collaboration among wilderness advocates, mountain bikers, horseback riders, business owners, civic organizations, faith groups, water organizations, bird clubs, wildflower clubs, and environmental groups shows that there is strong support for this proposal. Collectively, the groups involved represent tens of thousands of individuals who would like to see these areas permanently protected. We ask that you respond to this collaborative approach by recommending these areas be protected as Wilderness and National Scenic Areas.

We now have better maps of the proposed areas. I am attaching maps of a) the proposed Shenandoah Mountain National Scenic Area with core

Wilderness areas; b) the proposed Laurel Fork Wilderness; and c) the proposed Kelley Mountain-Big Levels National Scenic Area.

Thank you for the opportunity to participate in the development of a new forest plan.

Sincerely,

Lynn Cameron  
Co-Chair  
Friends of Shenandoah Mountain  
5653 Beards Ford Rd.  
Mt. Crawford, VA 22841  
(540)234-6273  
[camerosl@jmu.edu](mailto:camerosl@jmu.edu)

Thomas Jenkins  
Co-Chair  
Friends of Shenandoah Mountain  
375 E. Wolfe St.  
Harrisonburg, VA 22802  
(540) 437-9000  
[tj@shenandoahbicycle.com](mailto:tj@shenandoahbicycle.com)

Attachments:

Friends of Shenandoah Comments on Forest Plan, October 30, 2010  
Map of Proposed Shenandoah Mountain National Scenic Area (with proposed Skidmore Fork, Little River, Lynn Hollow, and Bald Ridge Wilderness areas shown within)  
Map of Proposed Kelley Mountain- Big Levels National Scenic Area  
Map of Proposed Laurel Fork Wilderness  
List of Endorsers as of 4/17/2010

October 30, 2008

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

Dear Planning Team:

The following comments on the George Washington National Forest plan and enclosed maps are submitted by Friends of Shenandoah Mountain, a group dedicated to protecting and promoting the ecological and recreational values of national forest land on Shenandoah Mountain, particularly the section between Rt. 250 and Rt. 33. The Friends group is composed of wilderness advocates, mountain bikers, hikers, and other forest users who would like to see the outstanding values of Shenandoah Mountain preserved to benefit this and future generations. Our comments and our proposal are the result of several years of collaboration and compromise, and such efforts with other user and interest groups continue. We propose a protection strategy that would:

- Protect the national forest land on Shenandoah Mountain in Virginia between Rt. 250 and Rt. 33 from roadbuilding, logging, wind development, and other activities that would mar the natural character and degrade the recreational opportunities of the area;
- Provide the highest protection of Wilderness designation to the most special wild places between Rt. 250 and Rt. 33: Skidmore Fork, Little River, Bald Ridge, and Lynn Hollow;
- Keep existing roads accessible to hunters, campers, and other forest users;
- Keep most trails in the area accessible to mountain bikers and provide new trails that would enhance recreational opportunities for both mountain bikers and hikers;

In addition to Shenandoah Mountain we ask for permanent protection of two other special areas that we value highly:

- Laurel Fork as Wilderness (located in Highland County on the border with West Virginia)
- Kelley Mountain/Big Levels as a National Scenic Area (located south of Waynesboro in the Blue Ridge Mountains)

Boundaries for the proposed Shenandoah Mountain National Scenic Area and Wilderness areas exclude all private land. The proposed boundaries apply to federal land only. Private landowners will continue to have access to their property and will retain all their rights. This proposal does not in any way recommend condemnation of private land.

### **Shenandoah Mountain National Scenic Area** (see attached map)

Friends of Shenandoah Mountain asks that the Forest Service recommend Shenandoah Mountain between Rt. 250 and Rt. 33 for National Scenic Area designation with core areas as Wilderness.

### **Rationale**

Shenandoah Mountain offers some of the most spectacular scenery in Virginia. The undulating ridgeline serves as a backdrop for the Shenandoah Valley, enjoyed daily by those of

us fortunate enough to live in the Valley and those who pass through on Interstate 81 alike. When we see a storm coming or a glorious sunset, we look toward Shenandoah Mountain. Those who venture to Reddish Knob are inspired by the panoramic view of the surrounding area. Shenandoah Mountain is more than a beautiful mountain; it is part of our culture and history. Protecting its beauty should be our generation's legacy to our children and grandchildren

The 115,000-acre section of Shenandoah Mountain that lies in Virginia between Rt. 250 and Rt. 33 knits together one of the most significant concentrations of roadless wildlands in the Southern Appalachians. It includes the 6,519-acre Ramseys Draft Wilderness, which was designated by Congress in 1984. Ramseys Draft is the only area on Shenandoah Mountain that is part of the National Wilderness Preservation System. The Shenandoah Mountain National Scenic Area proposal includes the following seven areas identified in *Virginia Mountain Treasures: The Unprotected Wildlands of the George Washington National Forest* (The Wilderness Society, 2008):

- Gum Run – 14,665 acres
- Skidmore Fork – 5,703 acres
- Little River – 29,342 acres
- Hankey Mountain – 11,281 acres
- Oak Knob – 10,866 acres
- Bald Ridge and Lynn Hollow – 17,933 acres

It is bounded on the western side by two additional Mountain Treasures: Dry River (12,939 acres) and Broad Run (5,047 acres) in West Virginia. The area has few roads, but certainly enough roads to provide access for sportsmen, recreationalists, and naturalists.

The Shenandoah Mountain area between Rt. 250 and Rt. 33 includes 10 named peaks that rise above 4,000 feet:

- High Knob – 4,080
- Bother Knob – 4,344
- Dundore Mountain – 4,101
- Flagpole Knob – 4,360
- Reddish Knob – 4,397
- Dyers Knob – 4,120
- Little Bald Knob – 4,351
- Big Bald Knob – 4,120
- Hardscrabble Knob – 4,282
- Tearjacket Knob – 4,229

The highest point is Reddish Knob which offers a 360-degree panoramic view of surrounding mountain valleys.

The area provides habitat for numerous plants, animals, and natural communities deemed special enough by scientists and government agencies to require protection. One of these, the Cow Knob Salamander, is found nowhere else on earth. The Shenandoah Mountain Crest – Cow Knob Salamander Conservation Area, a 43,000 acre area above 3,000 ft in elevation, is home to a variety of rare species and unique natural communities, including at least 15 species of plants and at least 13 species of animals and their habitats. This Shenandoah Mountain Crest includes the following Virginia Division of Natural Heritage Conservation sites:

- Bother Knob- High Knob – 1,618 acres
- Dunkle Knob – 25 acres
- Little Bald Knob – 10,866 acres
- Maple Springs – 102 acres
- Puffenbarger Glade – 147 acres
- Reddish Knob – 4,092 acres
- Skidmore – 2,313 acres

Although protected in the National Forest Plan, Shenandoah Mountain Crest has no permanent protection.

## **Water resource**

Shenandoah Mountain's eastern flank forms a major drainage divide for the headwaters of two major rivers, the Potomac to the north and the James to the south, both of which flow into the Chesapeake Bay. The North River and its tributaries drain most of the Shenandoah Mountain area, flowing into the Shenandoah River and on to the Potomac River. Ramseys Draft, Shaws Fork, and the Calfpasture flow from the southern end to the James River. Several streams in the Shenandoah Mountain area support native trout populations.

Perennial springs high on the mountains give rise to numerous pure streams, such as Skidmore Fork, North River, Black Run, Gum Run, Maple Springs Run, Little River, Hone Quarry Run, Briery Branch, Shaws Fork, Calfpasture River, and Ramseys Draft. These streams support aquatic life and provide abundant clean drinking water for municipalities in the Shenandoah Valley, including Harrisonburg, Staunton, and Bridgewater. Some of these mountain streams are dammed for municipal water supply, flood control, and recreation. Reservoirs and recreational lakes in the Shenandoah Mountain NSA include:

- Skidmore Fork Lake (Switzer Reservoir) – a principal water source for Harrisonburg
- Union Springs
- Hone Quarry Reservoir
- Briery Branch Reservoir
- Hearthstone Lake
- Todd Lake
- Elkhorn Lake
- Staunton Reservoir – a principal water source for Staunton
- Puffenbarger Pond
- Braley Pond

The value of these streams and reservoirs will increase as our population grows and clean water becomes more scarce. National Scenic Area designation would provide permanent protection of these critical watersheds. Reservoirs and lakes would continue to be maintained.

## **History**

The forest primeval that had existed on Shenandoah Mountain was reduced to a wasteland in the latter half of the nineteenth century due to promiscuous expansion and exploitation. Farming, mining, and logging all took their toll. During the same period turkey, bear, deer, and many other species were driven nearly to extinction in western Virginia due to overhunting and poor land management practices. The damage to the watershed from all the mining, logging, and subsequent burning led to clogged streams and flooding. When the forests were gone, repeated fires degraded the soils and stunted new growth. Even the forests today are poorer because of the soil damage and loss.

In response to all the devastation of the mountain forests, the U.S. Congress passed the Weeks Act in 1911, giving the federal government authority to purchase the mostly wasted land to protect watersheds. The Shenandoah Purchase Unit, which includes the Shenandoah Mountain area, was among the first land to be purchased.. The newly purchased forest land became Shenandoah National Forest in 1917. The name was changed to George Washington National Forest in 1932 to avoid confusion with Shenandoah National Park to the east of the Valley.

Initially, local mountain people did not take well to the federal government acquiring the land; many set fires on the land purchased by the government. Up through the 1920s, forestry officials estimated up to 94 percent of the fires were caused by man. In response to the natural and man-caused fires, a fire warden system was developed. It was invented in the George Washington National Forest and then later spread to other eastern and southern forests. A warden would be in charge of an area and would have a crew of local firefighters. One of these was organized from the students of Bridgewater College. Fire wardens used remote lookout towers and telephone lines for spotting fires and calling for help. Several of these fire towers were located on Shenandoah Mountain: High Knob (still standing and renovated in 2001-03), Bother Knob, Flagpole Knob, Reddish Knob, and Hardscrabble Knob. The fire warden system began to fade out between the 1940s through 1960s when Smokey Bear began to fight forest fires. Then aerial flights were used to detect fires, eliminating the need for men in towers. By the 1980s there were enough people living close to the forest to see and report fires, making even aerial flights unnecessary.

During the period between 1910 and 1925, chestnut blight moved through the area, killing the most productive and dominant species in the forest.

The Great Depression caused timber prices to plummet. President Roosevelt, however, poured New Deal money into land acquisitions for the National Forests. He also started the Civilian Conservation Corps (CCC) in 1933, providing 9,200 unemployed young men in Virginia with meaningful work and modest pay sufficient to support their families. The first CCC camp in the nation was located at Camp Roosevelt in the George Washington National Forest. Fourteen camps were located in the GW, with at least one located along the North River at Camp Todd in the Shenandoah Mountain area. The workers built roads, telephone lines, trails, and campgrounds. Shenandoah Mountain was and continues to be the beneficiary of work done by the CCC in its nine years of existence. Even on remote trails in the backcountry, one can see CCC rockwork that still holds the trail in place today.

As the forests and streams began to recover from past abuse, the Forest Service began to sell timber and develop the area for recreational and scenic values. The State of Virginia began to manage wildlife as it returned to the recovering landscape. The two agencies worked together to develop small herds of deer and stock streams with trout. They even tried to reintroduce elk in 1917 and 1935, but efforts were unsuccessful because too much of the species' undisturbed habitat was already gone. In 1960, the Multiple Use act was passed. In 1964 the Wilderness Act was passed and was followed by the Eastern Wilderness Areas Act in 1975. Although the U.S. Congress has designated Wilderness areas in Virginia four times, only one of these, Ramseys Draft Wilderness (6,518 acres), is located in the proposed Shenandoah Mountain National Scenic Area. This is despite several initiatives by citizens groups over past decades to add more of Shenandoah Mountain to the Wilderness system.

In addition to destruction caused by man, Shenandoah Mountain has experienced several significant natural events. The flood of 1949 scoured the Little River and caused major flooding downstream along the North River and in the town of Bridgewater. This flood provided the impetus for the construction of the series of flood-control dams in the headwaters of the North River drainage. In 1985, Shenandoah Mountain again experienced a major flood with over 20 inches of rain in a few days. In

the mid-1980s the invasive gypsy moth made its way to the area, defoliating and killing trees along the way, particularly on ridgetops. The gypsy moth population crashed suddenly in 1996 due to the fungus ([Entomophaga maimaiga](#)).

Following World War II, society became more mobile and prosperous. Recreational use of the forest increased by leaps and bounds.

Source: Satterthwaite, Jean L. *George Washington National Forest: A History*. USFS, 1993 and USFS web site.

### **Recreational opportunities**

Today Shenandoah Mountain offers a wide array of recreational opportunities ranging from mountain biking to bird watching. Although there are plenty of roads and trails for access, this area offers some of the best opportunities in Virginia to go deep into the forest and be several miles from a road.

- **Scenic drives** Although relatively unfragmented by roads, the Shenandoah Mountain area has a sufficient network of roads for visitors to enjoy the beauty of the mountains by automobile. A drive to Reddish Knob offers spectacular views of the Allegheny Mountains in Virginia and West Virginia, as well as the Valley below. It may be the best place in the mountains of Virginia to view a sunrise or sunset. In contrast a drive along Forest Road 95 offers close views of the North River tumbling out of the mountains with numerous roadside campsites readily available for an overnight stay in the forest. Forest Roads 85 and 101 provide interior access as well as roadside views.
- **Historic sites** Shenandoah Mountain has a rich history, and several sites are well preserved evidence of the past. The Civil War Confederate Breastworks, High Knob Fire Tower (built by the Civilian Conservation Corps and Veterans of World War I), and campgrounds and trails constructed by the CCC remind us of our past. In fact the current North River Campground was a CCC camp in the 1930s.
- **Hunting** The Shenandoah Mountain area provides exceptional habitat for bear and other species that need a remote undisturbed area. Mature forests with a full canopy help fill the need for a particular type of habitat not met by the more fragmented surrounding forest and private land. The entire area is well-known by hunters from the Valley and all over Virginia. Numerous roads provide ample access for good hunting.
- **Fishing** Streams and reservoirs in the Shenandoah Mountain area are popular for fishing. The Virginia Department of Game and Inland Fisheries routinely stocks most reservoirs and selected streams. Several streams, such as Little River and Ramseys Draft, have been designated as Native Trout Streams. Reservoirs popular for fishing include Switzer Lake, Hone Quarry Lake, Briery Branch Lake, Hearthstone Lake, Staunton Dam, Elkhorn Lake, Todd Lake, and Braley Pond.

- **Camping** The Shenandoah Mountain area in Virginia between Rt. 250 and Rt. 33 has four campgrounds: Todd Lake, North River, Hone Quarry, and Braley Pond. Roadside camping and exceptional opportunities for backcountry camping serve those who prefer a more primitive camping experience.
- **Picnic areas** Picnic areas in the Shenandoah Mountain area are dispersed in appealing, accessible locations along a road, near a lake or stream, or deep in the forest.
  - Braley Pond
  - Mountain House
  - Staunton Reservoir
  - Todd Lake
  - Hone Quarry
- **Hiking/Backpacking** Virginia's Shenandoah Mountain between Rt. 250 and Rt. 33 offers a network of 150 miles of trails that appeal to all levels of hikers from those who want challenging, long trails to those who prefer a short stroll in the forest. Two trails of particular significance are:
  - **Wild Oak National Recreational Trail** – a challenging 25-mile loop that ascends Little Bald Knob, Big Bald Knob, and Hankey Mountain.
  - **Shenandoah Mountain Trail** – a ridgeline trail that extends from Rt. 33 to Rt. 250. This trail is part of the new shared-use Great Eastern Trail that is planned to extend from New York to Florida.

The Shenandoah Mountain area is large enough that a backpacker can walk several days without crossing a road. Opportunities for this type of remote backcountry recreation are rare in the eastern United States.
- **Mountain Biking** A November 16, 2001, Washington Post article by Jeb Tilly describes the Little River area the best mountain biking in the state with “world-class downhills.” All trails in the Shenandoah Mountain area are open to mountain biking except for those in Wilderness areas. The proposed Wilderness area boundaries were drawn carefully to keep popular trails accessible to mountain bikers.
- **Horseback Riding** Nearly all trails are open to horseback riders, including those in Wilderness areas.
- **Birdwatching** The list of bird species in the area could easily reach 250, making it an ideal destination for birdwatching. The range of elevations from 1,600 ft to well above 4,000 ft makes it possible for the serious birdwatcher to see a wide variety of birds including warblers, neotropical migratory songbirds, and birds of prey, such as hawks, eagles, and peregrine falcons. *Discover Our Wild Side*, a new guide book by the Virginia Department of Game and Inland Fisheries that highlights the best wildlife viewing spots in Virginia, points readers to several areas on Shenandoah Mountain: the North River loop, Switzer Lake area, Hone Quarry area, Briery Branch Dam and Lake, Flagpole Knob, Reddish Knob, Hearthstone Lake, and Todd Lake.
- **Astronomy** Reddish Knob is one of the best places in the region to gaze at the stars. Because it is in a remote, undeveloped area, it is dark enough to allow the wonders of the galaxy to show through.



With energy costs rising, local families may take vacations closer to home. Shenandoah mountain area is an excellent destination. Protection of the area will ensure that the natural characteristics of the area and the quality of the visitor's experience will remain high.

A National Scenic Area would attract tourists and provide substantial benefit to the local economy. Tourists who visit the area will eat at local restaurants and buy supplies from local businesses.

Within the Shenandoah Mountain National Scenic Area, we ask that four outstanding wild areas be recommended for Wilderness designation.

**Little River Wilderness** (see attached map) – The Little River is the heart of the Shenandoah Mountain area and serves as an exceptional candidate for Wilderness designation. Given its size and isolation from human influences, this area is a productive haven for black bear and many species of birds, and it provides exceptional opportunities for primitive recreation.

Our proposal is for the entire Little River watershed, which extends from Reddish Knob at nearly 4,300 ft. in elevation down to Hearthstone Lake, and the entire Middle Mountain area. The total acreage of the area is 12,490. The proposed Wilderness area lies within a boundary formed by Timber Ridge Trail, Hearthstone Ridge Trail, Chestnut Ridge Trail, Little Bald Mountain Road, Forest Road 101, and several tracts of private land on the west side of Forest Road 101. The Wilderness boundary would be set back from FR95 and the private land to provide a buffer and allow space for construction of a new connector trail between Hearthstone Ridge Trail and Chestnut Ridge Trail. The proposed Wilderness boundary excludes Hearthstone Lake. Mineral rights for portions of the lower Little River area and part of Middle Mountain near Forest Road 101 are privately owned. We encourage the Forest Service to acquire these mineral rights when feasible.

These proposed boundaries are significantly smaller than the 28,000-acre Little River Special Management Area. The trails in the Little River area are very popular with mountain bikers. The reduced boundary will provide strong protection for the core area of Little River and Middle Mountain, while allowing mountain biking to continue on all trails except Buck Mountain Trail and Big Ridge/Grooms Ridge Trail. The remainder of the Little River Special Management Area would be protected as a National Scenic Area, which would provide protection similar to Wilderness designation without a restriction on mountain biking. No access roads would be closed or otherwise affected by this proposal. The area we are proposing for Wilderness is not being managed for timber now; Wilderness designation will not result in any loss of revenue or taxes for Augusta County.

**Skidmore Fork Wilderness** (see attached map) This 5,228-acre Wilderness proposal encompasses the major portion of the Skidmore Fork drainage, at the bottom of which lies Switzer Reservoir. The reservoir is a principal water source for the City of Harrisonburg. Wilderness designation would be the most positive assurance that this municipal water supply would be constant and pure. A prime feature of the area is a 1,400-acre patch of old growth in the headwaters of Skidmore Fork. The Virginia Division of Natural Heritage has identified ten rare species of flora or fauna within the

area. Elevations range from approximately 2,400 ft to 4,300 ft at Flagpole Knob. Switzer Reservoir and private land extending from some distance above it along Skidmore Fork are outside the proposed Wilderness boundary, as is the wildlife clearing at the end of FR 1197. The area is bounded by Dunkle Hollow Road, Shenandoah Mountain Trail, and the old Railroad Hollow Trail, which could be reopened to form a useful connector trail for hikers, bikers, and hunters. No access roads would be closed or otherwise affected by this proposal. The proposed Wilderness area is not being managed for timber now; Wilderness designation will not result in any loss of revenue or taxes for Rockingham County.

**Bald Ridge Wilderness** (see attached map) This proposal is for a 6,550-acre addition to the eastern and northern side of Ramseys Draft Wilderness that extends to the outer flanks of Bald Ridge down to 2,600 ft in elevation and encompasses Dividing Ridge and Springhouse Ridge all the way north to the Shenandoah Mountain Trail. This area was all part of the original Ramseys Draft Wilderness proposal.

This proposal lies within boundaries formed by Bridge Hollow Trail, following a 2,600 ft contour to and along FR 95 to the Shenandoah Mountain Trail, but set back enough from the road to allow for family car camping along the North River, as well as construction of a new trail that would connect trails in the North River headwaters area to Braley Pond area and Bridge Hollow Trail. The Dividing Ridge Trail and Springhouse Ridge Trail would both be within the proposed Wilderness area and would therefore not be open to mountain biking. Both trails, however, are very steep and currently serve as deadends to bikers when they reach the Ramseys Draft Wilderness boundary. For this reason they are not currently used much. New connector trails would enhance the recreational value of the trail network and would provide for more loop opportunities. Adding this outer flank of Bald Ridge to Ramseys Draft Wilderness will make a Wilderness of substantial size.

This proposal will not affect any access roads. This area is not being managed for timber; Wilderness designation will not result in any loss of revenue or taxes for Augusta County.

**Lynn Hollow Wilderness** (see attached map) This 6,168-acre area was originally part of the Ramseys Draft Wilderness proposal. It lies on the western flank of Shenandoah Mountain in Highland County and encompasses Freezeland Hollow, Lynn Hollow, and Sinclair Hollow. Sinclair Hollow Trail lies within the proposed Wilderness boundary.

The western Ramseys Draft Wilderness boundary is the ridgeline of Shenandoah Mountain. As the Shenandoah Mountain Trail weaves east and west of the ridgeline, it goes in and out of Ramseys Draft Wilderness fourteen times in five miles. We ask that a boundary adjustment be made that would make Shenandoah Mountain Trail the Ramseys Draft Wilderness boundary rather than the ridgeline. The trail would be a more definable boundary, and it would result in a slight increase of 20 acres for Ramseys Draft Wilderness. The Lynn Hollow Wilderness could then be a separate Wilderness area west of the Shenandoah Mountain Trail. Shenandoah Mountain Trail is a critical segment of the Great Eastern Trail, which is intended to be a shared use trail. With a boundary adjustment, the SMT would lie outside both Wilderness areas and could serve as a shared use trail.

This proposed Wilderness area will not affect any access roads. This area is not being managed for timber; Wilderness designation will not result in any loss of revenue or taxes for Highland County. Currently the mineral rights under this area are privately owned. We encourage the Forest Service to acquire these rights when feasible.

When viewed topographically, a Ramseys Draft Wilderness expanded by the addition of the outer flank of Bald Ridge and a separate Lynn Hollow Wilderness on the western flank of Shenandoah Mountain separated only by Shenandoah Mountain Trail would make a logical large wilderness area, while opening up access for recreational use.

In addition to asking for strong protection of the Shenandoah Mountain area, Friends of Shenandoah Mountain also asks for protection of two other special places:

**Laurel Fork** in Highland County, Warm Springs Ranger District (see attached map) – We ask that this remote 10,153-acre special management area be recommended for Wilderness designation; it is an ideal candidate. With elevations ranging up to 4,000 ft., it is one of the most beautiful and biologically rich areas in Virginia. It contains one of the finest examples of Northern Boreal natural community complexes in Virginia and is the only representative of the Allegheny Plateau Ecoregion within the commonwealth. At least 25 species of plants and animals have their only known occurrences in Virginia within this area. It is particularly known for salamanders, birds, beaver ponds, a spruce forest, and an exceptional native trout stream. It provides excellent opportunities for birdwatching, hiking, backpacking, and fishing. Citizen wilderness groups have considered this area to be one of the top candidates for Wilderness designation for 40 years. In the 1990s, a gas pipeline was constructed along the boundary of Laurel Fork. Ninety-six percent of Laurel Fork was under lease for mineral rights at that time. Conservation groups collaborated with the Forest Service to approach the holder of the leases. The holder agreed to relinquish surface occupancy of all the leases, and the easements are currently held by The Nature Conservancy. Given the successful outcome of this collaboration and cooperation, Laurel Fork has no mineral leases that would affect Wilderness designation. The Wilderness boundary would exclude Locust Spring Picnic Area.

**Kelley Mountain/Big Levels** (see attached map) in Augusta County, Pedlar Ranger District – This 12,895-acre area on the Blue Ridge Mountain range should be recommended for a National Scenic Area. It is a rich area that has long been recognized for its wildlife habitat potential. In 1935 President Roosevelt signed an act enlarging the Big Levels Game Refuge from the original 3,000 acres to more than 32,000 acres. The area ranges in elevation from 1,600 ft at the Coal Road to 3,440 ft at the summit of Flint Mountain. It is generally typical of the Blue Ridge province and consists of broadly sloping, steep-sided rocky ridges, drained by small steep-gradient freestone streams. An unusual feature is the Big Levels. This plateau averages 3,000 ft and is a remnant of the Summit Peneplain dating before the Blue Ridge upthrust. It is almost perfectly flat in some areas and is densely vegetated with pin oak, post oak, chestnut oak, Virginia pine, mountain laurel, rhododendron, wild azalea, black gum, and an extensive growth of young American chestnut. Green Pond, located at the western boundary, is a boggy remnant of the Summit Peneplain and is geologically older than the Blue Ridge upthrust. Wild turkey and whitetail deer are particularly abundant with a healthy population of black bear present along with smaller animals and birds. All streams draining the area with the exception of Orebank Creek contain populations of

native Eastern brook trout. It has an extensive network of trails that are popular for mountain biking. Local clubs from Charlottesville and Harrisonburg maintain the trails in this area. Its proximity to Sherando and the Blue Ridge Parkway makes National Scenic Area designation appropriate. This status would protect the biological richness of the area while allowing mountain biking to continue. The area is bounded by FR160 (which separates Kelley Mountain/Big Levels from St. Marys Wilderness), Coal Road, Blue Ridge Parkway land, and Sherando Recreation Area.

## **Conclusion**

The area of Shenandoah Mountain between Rt. 250 and Rt. 33 is the largest and least fragmented continuous block of land remaining in the Central Appalachians. It provides exceptional natural beauty, wildlife habitat, trails, and scenic roads and overlooks. It supports a rich array of recreational opportunities, such as hunting, fishing, camping, biking, hiking, and nature study. Springs, streams, and rivers that flow from the area supply a precious, essential resource for the Valley and downstream. We believe that the best way these values can be permanently protected is through National Scenic Area designation with core wild areas designated as Wilderness. Our proposal would protect water quality and wildlife habitat, while supporting a rich array of recreational experiences that are important to our quality of life and the economy of our local area.

Laurel Fork is a remote, unique, and biologically rich area that would make an ideal candidate for Wilderness.

Kelley Mountain/Big Levels is a popular recreation area with rich biological resources; given its proximity to the Blue Ridge Parkway and Sherando Recreation Area, it would be well suited for a National Scenic Area.

Thank you for your consideration.

Sincerely,

Lynn Cameron  
Co-Chair  
Friends of Shenandoah Mountain  
5653 Beards Ford Rd.  
Mt. Crawford, VA 22841  
(540)234-6273  
[camerosl@jmu.edu](mailto:camerosl@jmu.edu)

Thomas Jenkins  
Co-Chair  
Friends of Shenandoah Mountain  
375 E. Wolfe St.  
Harrisonburg, VA 22802  
(540) 437-9000  
[tj@shenandoahbicycle.com](mailto:tj@shenandoahbicycle.com)

Attachments:

Map of Proposed Shenandoah Mountain National Scenic Area (with proposed Skidmore Fork, Little River, Lynn Hollow, and Bald Ridge Wilderness areas shown within)  
Map of Proposed Kelley Mountain National Scenic Area  
Map of Proposed Laurel Fork Wilderness

October 30, 2008

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Dear Planning Team:

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- Protect the national forest land on Shenandoah Mountain in Virginia between Rt. 250 and Rt. 33 from roadbuilding, logging, wind development, and other activities that would mar the natural character and degrade the recreational opportunities of the area;
- Provide the highest protection of Wilderness designation to the most special wild places between Rt. 250 and Rt. 33: Skidmore Fork, Little River, Bald Ridge, and Lynn Hollow;
- Keep existing roads accessible to hunters, campers, and other forest users;
- Keep most trails in the area accessible to mountain bikers and provide new trails that would enhance recreational opportunities for both mountain bikers and hikers;

In addition to Shenandoah Mountain we ask for permanent protection of two other special areas that we value highly:

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### **Shenandoah Mountain National Scenic Area** (see attached map)

Friends of Shenandoah Mountain asks that the Forest Service recommend Shenandoah Mountain between Rt. 250 and Rt. 33 for National Scenic Area designation with core areas as Wilderness.

### **Rationale**

Shenandoah Mountain offers some of the most spectacular scenery in Virginia. The undulating ridgeline serves as a backdrop for the Shenandoah Valley, enjoyed daily by those of

us fortunate enough to live in the Valley and those who pass through on Interstate 81 alike. When we see a storm coming or a glorious sunset, we look toward Shenandoah Mountain. Those who venture to Reddish Knob are inspired by the panoramic view of the surrounding area. Shenandoah Mountain is more than a beautiful mountain; it is part of our culture and history. Protecting its beauty should be our generation's legacy to our children and grandchildren

The 115,000-acre section of Shenandoah Mountain that lies in Virginia between Rt. 250 and Rt. 33 knits together one of the most significant concentrations of roadless wildlands in the Southern Appalachians. It includes the 6,519-acre Ramseys Draft Wilderness, which was designated by Congress in 1984. Ramseys Draft is the only area on Shenandoah Mountain that is part of the National Wilderness Preservation System. The Shenandoah Mountain National Scenic Area proposal includes the following seven areas identified in *Virginia Mountain Treasures: The Unprotected Wildlands of the George Washington National Forest* (The Wilderness Society, 2008):

- Gum Run – 14,665 acres
- Skidmore Fork – 5,703 acres
- Little River – 29,342 acres
- Hankey Mountain – 11,281 acres
- Oak Knob – 10,866 acres
- Bald Ridge and Lynn Hollow – 17,933 acres

It is bounded on the western side by two additional Mountain Treasures: Dry River (12,939 acres) and Broad Run (5,047 acres) in West Virginia. The area has few roads, but certainly enough roads to provide access for sportsmen, recreationalists, and naturalists.

The Shenandoah Mountain area between Rt. 250 and Rt. 33 includes 10 named peaks that rise above 4,000 feet:

- High Knob – 4,080
- Bother Knob – 4,344
- Dundore Mountain – 4,101
- Flagpole Knob – 4,360
- Reddish Knob – 4,397
- Dyers Knob – 4,120
- Little Bald Knob – 4,351
- Big Bald Knob – 4,120
- Hardscrabble Knob – 4,282
- Tearjacket Knob – 4,229

The highest point is Reddish Knob which offers a 360-degree panoramic view of surrounding mountain valleys.

The area provides habitat for numerous plants, animals, and natural communities deemed special enough by scientists and government agencies to require protection. One of these, the Cow Knob Salamander, is found nowhere else on earth. The Shenandoah Mountain Crest – Cow Knob Salamander Conservation Area, a 43,000 acre area above 3,000 ft in elevation, is home to a variety of rare species and unique natural communities, including at least 15 species of plants and at least 13 species of animals and their habitats. This Shenandoah Mountain Crest includes the following Virginia Division of Natural Heritage Conservation sites:

- Bother Knob- High Knob – 1,618 acres
- Dunkle Knob – 25 acres
- Little Bald Knob – 10,866 acres
- Maple Springs – 102 acres
- Puffenbarger Glade – 147 acres
- Reddish Knob – 4,092 acres
- Skidmore – 2,313 acres

Although protected in the National Forest Plan, Shenandoah Mountain Crest has no permanent protection.

## **Water resource**

Shenandoah Mountain's eastern flank forms a major drainage divide for the headwaters of two major rivers, the Potomac to the north and the James to the south, both of which flow into the Chesapeake Bay. The North River and its tributaries drain most of the Shenandoah Mountain area, flowing into the Shenandoah River and on to the Potomac River. Ramseys Draft, Shaws Fork, and the Calfpasture flow from the southern end to the James River. Several streams in the Shenandoah Mountain area support native trout populations.

Perennial springs high on the mountains give rise to numerous pure streams, such as Skidmore Fork, North River, Black Run, Gum Run, Maple Springs Run, Little River, Hone Quarry Run, Briery Branch, Shaws Fork, Calfpasture River, and Ramseys Draft. These streams support aquatic life and provide abundant clean drinking water for municipalities in the Shenandoah Valley, including Harrisonburg, Staunton, and Bridgewater. Some of these mountain streams are dammed for municipal water supply, flood control, and recreation. Reservoirs and recreational lakes in the Shenandoah Mountain NSA include:

- Skidmore Fork Lake (Switzer Reservoir) – a principal water source for Harrisonburg
- Union Springs
- Hone Quarry Reservoir
- Briery Branch Reservoir
- Hearthstone Lake
- Todd Lake
- Elkhorn Lake
- Staunton Reservoir – a principal water source for Staunton
- Puffenbarger Pond
- Braley Pond

The value of these streams and reservoirs will increase as our population grows and clean water becomes more scarce. National Scenic Area designation would provide permanent protection of these critical watersheds. Reservoirs and lakes would continue to be maintained.

## **History**

The forest primeval that had existed on Shenandoah Mountain was reduced to a wasteland in the latter half of the nineteenth century due to promiscuous expansion and exploitation. Farming, mining, and logging all took their toll. During the same period turkey, bear, deer, and many other species were driven nearly to extinction in western Virginia due to overhunting and poor land management practices. The damage to the watershed from all the mining, logging, and subsequent burning led to clogged streams and flooding. When the forests were gone, repeated fires degraded the soils and stunted new growth. Even the forests today are poorer because of the soil damage and loss.

In response to all the devastation of the mountain forests, the U.S. Congress passed the Weeks Act in 1911, giving the federal government authority to purchase the mostly wasted land to protect watersheds. The Shenandoah Purchase Unit, which includes the Shenandoah Mountain area, was among the first land to be purchased.. The newly purchased forest land became Shenandoah National Forest in 1917. The name was changed to George Washington National Forest in 1932 to avoid confusion with Shenandoah National Park to the east of the Valley.

Initially, local mountain people did not take well to the federal government acquiring the land; many set fires on the land purchased by the government. Up through the 1920s, forestry officials estimated up to 94 percent of the fires were caused by man. In response to the natural and man-caused fires, a fire warden system was developed. It was invented in the George Washington National Forest and then later spread to other eastern and southern forests. A warden would be in charge of an area and would have a crew of local firefighters. One of these was organized from the students of Bridgewater College. Fire wardens used remote lookout towers and telephone lines for spotting fires and calling for help. Several of these fire towers were located on Shenandoah Mountain: High Knob (still standing and renovated in 2001-03), Bother Knob, Flagpole Knob, Reddish Knob, and Hardscrabble Knob. The fire warden system began to fade out between the 1940s through 1960s when Smokey Bear began to fight forest fires. Then aerial flights were used to detect fires, eliminating the need for men in towers. By the 1980s there were enough people living close to the forest to see and report fires, making even aerial flights unnecessary.

During the period between 1910 and 1925, chestnut blight moved through the area, killing the most productive and dominant species in the forest.

The Great Depression caused timber prices to plummet. President Roosevelt, however, poured New Deal money into land acquisitions for the National Forests. He also started the Civilian Conservation Corps (CCC) in 1933, providing 9,200 unemployed young men in Virginia with meaningful work and modest pay sufficient to support their families. The first CCC camp in the nation was located at Camp Roosevelt in the George Washington National Forest. Fourteen camps were located in the GW, with at least one located along the North River at Camp Todd in the Shenandoah Mountain area. The workers built roads, telephone lines, trails, and campgrounds. Shenandoah Mountain was and continues to be the beneficiary of work done by the CCC in its nine years of existence. Even on remote trails in the backcountry, one can see CCC rockwork that still holds the trail in place today.

As the forests and streams began to recover from past abuse, the Forest Service began to sell timber and develop the area for recreational and scenic values. The State of Virginia began to manage wildlife as it returned to the recovering landscape. The two agencies worked together to develop small herds of deer and stock streams with trout. They even tried to reintroduce elk in 1917 and 1935, but efforts were unsuccessful because too much of the species' undisturbed habitat was already gone. In 1960, the Multiple Use act was passed. In 1964 the Wilderness Act was passed and was followed by the Eastern Wilderness Areas Act in 1975. Although the U.S. Congress has designated Wilderness areas in Virginia four times, only one of these, Ramseys Draft Wilderness (6,518 acres), is located in the proposed Shenandoah Mountain National Scenic Area. This is despite several initiatives by citizens groups over past decades to add more of Shenandoah Mountain to the Wilderness system.

In addition to destruction caused by man, Shenandoah Mountain has experienced several significant natural events. The flood of 1949 scoured the Little River and caused major flooding downstream along the North River and in the town of Bridgewater. This flood provided the impetus for the construction of the series of flood-control dams in the headwaters of the North River drainage. In 1985, Shenandoah Mountain again experienced a major flood with over 20 inches of rain in a few days. In



the mid-1980s the invasive gypsy moth made its way to the area, defoliating and killing trees along the way, particularly on ridgetops. The gypsy moth population crashed suddenly in 1996 due to the fungus ([Entomophaga maimaiga](#)).

Following World War II, society became more mobile and prosperous. Recreational use of the forest increased by leaps and bounds.

Source: Satterthwaite, Jean L. *George Washington National Forest: A History*. USFS, 1993 and USFS web site.

### **Recreational opportunities**

Today Shenandoah Mountain offers a wide array of recreational opportunities ranging from mountain biking to bird watching. Although there are plenty of roads and trails for access, this area offers some of the best opportunities in Virginia to go deep into the forest and be several miles from a road.

- **Scenic drives** Although relatively unfragmented by roads, the Shenandoah Mountain area has a sufficient network of roads for visitors to enjoy the beauty of the mountains by automobile. A drive to Reddish Knob offers spectacular views of the Allegheny Mountains in Virginia and West Virginia, as well as the Valley below. It may be the best place in the mountains of Virginia to view a sunrise or sunset. In contrast a drive along Forest Road 95 offers close views of the North River tumbling out of the mountains with numerous roadside campsites readily available for an overnight stay in the forest. Forest Roads 85 and 101 provide interior access as well as roadside views.
- **Historic sites** Shenandoah Mountain has a rich history, and several sites are well preserved evidence of the past. The Civil War Confederate Breastworks, High Knob Fire Tower (built by the Civilian Conservation Corps and Veterans of World War I), and campgrounds and trails constructed by the CCC remind us of our past. In fact the current North River Campground was a CCC camp in the 1930s.
- **Hunting** The Shenandoah Mountain area provides exceptional habitat for bear and other species that need a remote undisturbed area. Mature forests with a full canopy help fill the need for a particular type of habitat not met by the more fragmented surrounding forest and private land. The entire area is well-known by hunters from the Valley and all over Virginia. Numerous roads provide ample access for good hunting.
- **Fishing** Streams and reservoirs in the Shenandoah Mountain area are popular for fishing. The Virginia Department of Game and Inland Fisheries routinely stocks most reservoirs and selected streams. Several streams, such as Little River and Ramseys Draft, have been designated as Native Trout Streams. Reservoirs popular for fishing include Switzer Lake, Hone Quarry Lake, Briery Branch Lake, Hearthstone Lake, Staunton Dam, Elkhorn Lake, Todd Lake, and Braley Pond.

- **Camping** The Shenandoah Mountain area in Virginia between Rt. 250 and Rt. 33 has four campgrounds: Todd Lake, North River, Hone Quarry, and Braley Pond. Roadside camping and exceptional opportunities for backcountry camping serve those who prefer a more primitive camping experience.
- **Picnic areas** Picnic areas in the Shenandoah Mountain area are dispersed in appealing, accessible locations along a road, near a lake or stream, or deep in the forest.
  - Braley Pond
  - Mountain House
  - Staunton Reservoir
  - Todd Lake
  - Hone Quarry
- **Hiking/Backpacking** Virginia's Shenandoah Mountain between Rt. 250 and Rt. 33 offers a network of 150 miles of trails that appeal to all levels of hikers from those who want challenging, long trails to those who prefer a short stroll in the forest. Two trails of particular significance are:
  - **Wild Oak National Recreational Trail** – a challenging 25-mile loop that ascends Little Bald Knob, Big Bald Knob, and Hankey Mountain.
  - **Shenandoah Mountain Trail** – a ridgeline trail that extends from Rt. 33 to Rt. 250. This trail is part of the new shared-use Great Eastern Trail that is planned to extend from New York to Florida.

The Shenandoah Mountain area is large enough that a backpacker can walk several days without crossing a road. Opportunities for this type of remote backcountry recreation are rare in the eastern United States.
- **Mountain Biking** A November 16, 2001, Washington Post article by Jeb Tilly describes the Little River area the best mountain biking in the state with “world-class downhill.” All trails in the Shenandoah Mountain area are open to mountain biking except for those in Wilderness areas. The proposed Wilderness area boundaries were drawn carefully to keep popular trails accessible to mountain bikers.
- **Horseback Riding** Nearly all trails are open to horseback riders, including those in Wilderness areas.
- **Birdwatching** The list of bird species in the area could easily reach 250, making it an ideal destination for birdwatching. The range of elevations from 1,600 ft to well above 4,000 ft makes it possible for the serious birdwatcher to see a wide variety of birds including warblers, neotropical migratory songbirds, and birds of prey, such as hawks, eagles, and peregrine falcons. *Discover Our Wild Side*, a new guide book by the Virginia Department of Game and Inland Fisheries that highlights the best wildlife viewing spots in Virginia, points readers to several areas on Shenandoah Mountain: the North River loop, Switzer Lake area, Hone Quarry area, Briery Branch Dam and Lake, Flagpole Knob, Reddish Knob, Hearthstone Lake, and Todd Lake.
- **Astronomy** Reddish Knob is one of the best places in the region to gaze at the stars. Because it is in a remote, undeveloped area, it is dark enough to allow the wonders of the galaxy to show through.

With energy costs rising, local families may take vacations closer to home. Shenandoah mountain area is an excellent destination. Protection of the area will ensure that the natural characteristics of the area and the quality of the visitor's experience will remain high.

A National Scenic Area would attract tourists and provide substantial benefit to the local economy. Tourists who visit the area will eat at local restaurants and buy supplies from local businesses.

Within the Shenandoah Mountain National Scenic Area, we ask that four outstanding wild areas be recommended for Wilderness designation.

**Little River Wilderness** (see attached map) – The Little River is the heart of the Shenandoah Mountain area and serves as an exceptional candidate for Wilderness designation. Given its size and isolation from human influences, this area is a productive haven for black bear and many species of birds, and it provides exceptional opportunities for primitive recreation.

Our proposal is for the entire Little River watershed, which extends from Reddish Knob at nearly 4,300 ft. in elevation down to Hearthstone Lake, and the entire Middle Mountain area. The total acreage of the area is 12,490. The proposed Wilderness area lies within a boundary formed by Timber Ridge Trail, Hearthstone Ridge Trail, Chestnut Ridge Trail, Little Bald Mountain Road, Forest Road 101, and several tracts of private land on the west side of Forest Road 101. The Wilderness boundary would be set back from FR95 and the private land to provide a buffer and allow space for construction of a new connector trail between Hearthstone Ridge Trail and Chestnut Ridge Trail. The proposed Wilderness boundary excludes Hearthstone Lake. Mineral rights for portions of the lower Little River area and part of Middle Mountain near Forest Road 101 are privately owned. We encourage the Forest Service to acquire these mineral rights when feasible.

These proposed boundaries are significantly smaller than the 28,000-acre Little River Special Management Area. The trails in the Little River area are very popular with mountain bikers. The reduced boundary will provide strong protection for the core area of Little River and Middle Mountain, while allowing mountain biking to continue on all trails except Buck Mountain Trail and Big Ridge/Grooms Ridge Trail. The remainder of the Little River Special Management Area would be protected as a National Scenic Area, which would provide protection similar to Wilderness designation without a restriction on mountain biking. No access roads would be closed or otherwise affected by this proposal. The area we are proposing for Wilderness is not being managed for timber now; Wilderness designation will not result in any loss of revenue or taxes for Augusta County.

**Skidmore Fork Wilderness** (see attached map) This 5,228-acre Wilderness proposal encompasses the major portion of the Skidmore Fork drainage, at the bottom of which lies Switzer Reservoir. The reservoir is a principal water source for the City of Harrisonburg. Wilderness designation would be the most positive assurance that this municipal water supply would be constant and pure. A prime feature of the area is a 1,400-acre patch of old growth in the headwaters of Skidmore Fork. The Virginia Division of Natural Heritage has identified ten rare species of flora or fauna within the

area. Elevations range from approximately 2,400 ft to 4,300 ft at Flagpole Knob. Switzer Reservoir and private land extending from some distance above it along Skidmore Fork are outside the proposed Wilderness boundary, as is the wildlife clearing at the end of FR 1197. The area is bounded by Dunkle Hollow Road, Shenandoah Mountain Trail, and the old Railroad Hollow Trail, which could be reopened to form a useful connector trail for hikers, bikers, and hunters. No access roads would be closed or otherwise affected by this proposal. The proposed Wilderness area is not being managed for timber now; Wilderness designation will not result in any loss of revenue or taxes for Rockingham County.

**Bald Ridge Wilderness** (see attached map) This proposal is for a 6,550-acre addition to the eastern and northern side of Ramseys Draft Wilderness that extends to the outer flanks of Bald Ridge down to 2,600 ft in elevation and encompasses Dividing Ridge and Springhouse Ridge all the way north to the Shenandoah Mountain Trail. This area was all part of the original Ramseys Draft Wilderness proposal.

This proposal lies within boundaries formed by Bridge Hollow Trail, following a 2,600 ft contour to and along FR 95 to the Shenandoah Mountain Trail, but set back enough from the road to allow for family car camping along the North River, as well as construction of a new trail that would connect trails in the North River headwaters area to Braley Pond area and Bridge Hollow Trail. The Dividing Ridge Trail and Springhouse Ridge Trail would both be within the proposed Wilderness area and would therefore not be open to mountain biking. Both trails, however, are very steep and currently serve as deadends to bikers when they reach the Ramseys Draft Wilderness boundary. For this reason they are not currently used much. New connector trails would enhance the recreational value of the trail network and would provide for more loop opportunities. Adding this outer flank of Bald Ridge to Ramseys Draft Wilderness will make a Wilderness of substantial size.

This proposal will not affect any access roads. This area is not being managed for timber; Wilderness designation will not result in any loss of revenue or taxes for Augusta County.

**Lynn Hollow Wilderness** (see attached map) This 6,168-acre area was originally part of the Ramseys Draft Wilderness proposal. It lies on the western flank of Shenandoah Mountain in Highland County and encompasses Freezeland Hollow, Lynn Hollow, and Sinclair Hollow. Sinclair Hollow Trail lies within the proposed Wilderness boundary.

The western Ramseys Draft Wilderness boundary is the ridgeline of Shenandoah Mountain. As the Shenandoah Mountain Trail weaves east and west of the ridgeline, it goes in and out of Ramseys Draft Wilderness fourteen times in five miles. We ask that a boundary adjustment be made that would make Shenandoah Mountain Trail the Ramseys Draft Wilderness boundary rather than the ridgeline. The trail would be a more definable boundary, and it would result in a slight increase of 20 acres for Ramseys Draft Wilderness. The Lynn Hollow Wilderness could then be a separate Wilderness area west of the Shenandoah Mountain Trail. Shenandoah Mountain Trail is a critical segment of the Great Eastern Trail, which is intended to be a shared use trail. With a boundary adjustment, the SMT would lie outside both Wilderness areas and could serve as a shared use trail.

This proposed Wilderness area will not affect any access roads. This area is not being managed for timber; Wilderness designation will not result in any loss of revenue or taxes for Highland County. Currently the mineral rights under this area are privately owned. We encourage the Forest Service to acquire these rights when feasible.

When viewed topographically, a Ramseys Draft Wilderness expanded by the addition of the outer flank of Bald Ridge and a separate Lynn Hollow Wilderness on the western flank of Shenandoah Mountain separated only by Shenandoah Mountain Trail would make a logical large wilderness area, while opening up access for recreational use.

In addition to asking for strong protection of the Shenandoah Mountain area, Friends of Shenandoah Mountain also asks for protection of two other special places:

**Laurel Fork** in Highland County, Warm Springs Ranger District (see attached map) – We ask that this remote 10,153-acre special management area be recommended for Wilderness designation; it is an ideal candidate. With elevations ranging up to 4,000 ft., it is one of the most beautiful and biologically rich areas in Virginia. It contains one of the finest examples of Northern Boreal natural community complexes in Virginia and is the only representative of the Allegheny Plateau Ecoregion within the commonwealth. At least 25 species of plants and animals have their only known occurrences in Virginia within this area. It is particularly known for salamanders, birds, beaver ponds, a spruce forest, and an exceptional native trout stream. It provides excellent opportunities for birdwatching, hiking, backpacking, and fishing. Citizen wilderness groups have considered this area to be one of the top candidates for Wilderness designation for 40 years. In the 1990s, a gas pipeline was constructed along the boundary of Laurel Fork. Ninety-six percent of Laurel Fork was under lease for mineral rights at that time. Conservation groups collaborated with the Forest Service to approach the holder of the leases. The holder agreed to relinquish surface occupancy of all the leases, and the easements are currently held by The Nature Conservancy. Given the successful outcome of this collaboration and cooperation, Laurel Fork has no mineral leases that would affect Wilderness designation. The Wilderness boundary would exclude Locust Spring Picnic Area.

**Kelley Mountain/Big Levels** (see attached map) in Augusta County, Pedlar Ranger District – This 12,895-acre area on the Blue Ridge Mountain range should be recommended for a National Scenic Area. It is a rich area that has long been recognized for its wildlife habitat potential. In 1935 President Roosevelt signed an act enlarging the Big Levels Game Refuge from the original 3,000 acres to more than 32,000 acres. The area ranges in elevation from 1,600 ft at the Coal Road to 3,440 ft at the summit of Flint Mountain. It is generally typical of the Blue Ridge province and consists of broadly sloping, steep-sided rocky ridges, drained by small steep-gradient freestone streams. An unusual feature is the Big Levels. This plateau averages 3,000 ft and is a remnant of the Summit Peneplain dating before the Blue Ridge upthrust. It is almost perfectly flat in some areas and is densely vegetated with pin oak, post oak, chestnut oak, Virginia pine, mountain laurel, rhododendron, wild azalea, black gum, and an extensive growth of young American chestnut. Green Pond, located at the western boundary, is a boggy remnant of the Summit Peneplain and is geologically older than the Blue Ridge upthrust. Wild turkey and whitetail deer are particularly abundant with a healthy population of black bear present along with smaller animals and birds. All streams draining the area with the exception of Orebank Creek contain populations of

native Eastern brook trout. It has an extensive network of trails that are popular for mountain biking. Local clubs from Charlottesville and Harrisonburg maintain the trails in this area. Its proximity to Sherando and the Blue Ridge Parkway makes National Scenic Area designation appropriate. This status would protect the biological richness of the area while allowing mountain biking to continue. The area is bounded by FR160 (which separates Kelley Mountain/Big Levels from St. Marys Wilderness), Coal Road, Blue Ridge Parkway land, and Sherando Recreation Area.

## **Conclusion**

The area of Shenandoah Mountain between Rt. 250 and Rt. 33 is the largest and least fragmented continuous block of land remaining in the Central Appalachians. It provides exceptional natural beauty, wildlife habitat, trails, and scenic roads and overlooks. It supports a rich array of recreational opportunities, such as hunting, fishing, camping, biking, hiking, and nature study. Springs, streams, and rivers that flow from the area supply a precious, essential resource for the Valley and downstream. We believe that the best way these values can be permanently protected is through National Scenic Area designation with core wild areas designated as Wilderness. Our proposal would protect water quality and wildlife habitat, while supporting a rich array of recreational experiences that are important to our quality of life and the economy of our local area.

Laurel Fork is a remote, unique, and biologically rich area that would make an ideal candidate for Wilderness.

Kelley Mountain/Big Levels is a popular recreation area with rich biological resources; given its proximity to the Blue Ridge Parkway and Sherando Recreation Area, it would be well suited for a National Scenic Area.

Thank you for your consideration.

Sincerely,

Lynn Cameron  
Co-Chair  
Friends of Shenandoah Mountain  
5653 Beards Ford Rd.  
Mt. Crawford, VA 22841  
(540)234-6273  
[camerosl@jmu.edu](mailto:camerosl@jmu.edu)

Thomas Jenkins  
Co-Chair  
Friends of Shenandoah Mountain  
375 E. Wolfe St.  
Harrisonburg, VA 22802  
(540) 437-9000  
[tj@shenandoahbicycle.com](mailto:tj@shenandoahbicycle.com)

Attachments:

Map of Proposed Shenandoah Mountain National Scenic Area (with proposed Skidmore Fork, Little River, Lynn Hollow, and Bald Ridge Wilderness areas shown within)  
Map of Proposed Kelley Mountain National Scenic Area  
Map of Proposed Laurel Fork Wilderness