P.O. Box 1065
Charlottesville, VA 22902
(434) 971-1553
www.wildvirginia.org

July 2, 2009

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

COMMENTS on the REVISION
of the LAND and RESOURCE MANAGEMENT PLAN
for the GEORGE WASHINGTON NATIONAL FOREST
on the issues of
ROADLESS AREAS, WILDERNESS,
POTENTIAL WILDERNESS AREAS, ROADS,
PRIMITIVE RECREATION and FRAGMENTATION

We greatly appreciate your review of Virginia Mountain Treasures areas for inclusion in the Potential Wilderness Inventory for the Revised Land and Resource Management Plan for the George Washington National Forest. Your analysis, however fails to address numerous significant and important issues which are listed and discussed in these comments. Wild Virginia believes the significantly reduced timeline and legally questionable planning regulations under which the planning is being carried out results in analysis which is incomplete, deficient and flawed with regards to the issues we have identified.

The George Washington National Forest (GW) has more roadless acreage than any national forest east of the Mississippi River and may be viewed as the wildest forest in the East. Yet only 4% of the GW is Wilderness, much less than the average across the nation, Region 8 or Region 9.

INCOMPLETE ANALYSIS

The Potential Wilderness Inventory is incomplete as required by Chapter 74, Land Management Planning Handbook (FSH 1909.12, Amendment Number 1909.12-2007-1, effective January 31, 2007).

1. There is no overview of the areas as required, including the acreage of the area and its location, uses and key attractions.

2. The "Capability" Evaluation consists only of a spreadsheet listing factors and corresponding yes, no or list-type answers for the areas. Without any narrative discussion, the spreadsheet is oversimplified and inadequate. It does not describe "the basic characteristics that make the area appropriate and valuable for wilderness".

3. The "Capability" Evaluation does not explain how the listed factors were considered by the Forest Service (FS). For example, the spreadsheet does not indicate whether the FS viewed the factor as supporting a Wilderness recommendation, detracting from it, or neutral, or how important the factor was to the agency (what role the factor played in the decision).

4. The analysis of the "availability" of areas has not yet been performed or has not been provided to the public. The list of availability factors that will be considered, dated 8/27/2008, consists entirely of factors that would, in the FS view, weigh against Wilderness recommendation. We are concerned that these factors will constrain the analysis and prevent a true comparison of the value of and need for the wilderness resource compared to the value of and need for other resources.

5. The analysis of need for more Wilderness either has not been done or has not been provided to the public.

6. The effects of a Wilderness recommendation compared to a nonwilderness designation and to other management options must be analyzed and described, (ibid. Ch.74). The effects analysis also has not been done or has not been provided to the public. The Forest Service should perform this analysis, considering and comparing the effects of Wilderness recommendation, designation as a remote backcountry special area (management consistent with 2001 Roadless Area Rule), and allocation to areas suitable for timber harvesting, timber production, and permanent or temporary road construction.

7. There was never a consideration of maximizing Potential Wilderness, as would have been done through the NEPA analysis required of consideration of a range of alternatives under planning regulations that applied to the 1992 Plan. As a result, road closures/decommissionings, purchasing of mineral rights, and acquisitions of surrounding lands or inholdings within the purchase boundaries were not considered as possibilities that would increase the size or number of areas which qualify for Potential Wilderness.

8. Primitive Recreation possibilities were not explored to the fullest in the Potential Wilderness analysis.

9. Detailed old growth inventories were not updated or analyzed in your Potential Wilderness Inventory.

10. Several areas were excluded from the review by the FS and should be evaluated and considered for Potential Wilderness and/or Wilderness Study recommendation, including Three High Heads (part of Big Schloss), Skidmore Fork (part of the new High Knob roadless area), and Whites Peak which have not been evaluated as separate areas.

11. Finally, planners wrongfully formed a fairly clear idea of the areas they were likely to recommend for Wilderness designation in January 2009, before analyzing the previously mentioned factors and lack of explanation regarding how the factors were considered for each area.

LAND ADJACENT to GWNF

In its multiple use mandate, the Forest Service is required to prioritize those resources and values not available elsewhere. These priorities were net evaluated, weighed or valued in the analysis. The current and projected increases in housing density on lands adjacent to the GW ("projected changes on more than 1.4 million adjacent private rural acres") clarify and intensify the significant contrast value provided by Mountain Treasures, Wilderness Areas, roadless areas, and/or "potential wilderness areas" on the National Forest. These public places grow increasingly important as they provide conditions that are different from the rest of the developed landscape. And the fact that they may be close to such development is actually beneficial in a social and economic sense.

THE NEED for WILDERNESS

One of the planning parameters from the agency is to analyze the need for wilderness. This was not included in the Potential Wilderness Inventory analysis. Under the Bailey ecosystem classification regime, the GWNF is part of the ecoregion called the "Central Appalachian Broadleaf Forest - Coniferous Forest - Meadow Province". The area of this province is approximately 43,600,000 acres, which is 2.3% of the conterminous U.S. land area. However, only 0.6% of the province is presently protected as Wilderness. The Wilderness to province area ratio of less than 1 (*viz*., 0.26) indicates that this ecoregion is under-represented in the National Wilderness Preservation System and not well protected (see pp. 20-23 in Loomis, J.B. and R. Richardson. 2000 and Economic Values of Protecting Roadless Areas in the United States. The Wilderness Society, Washington, D.C. 34 + vii).

REPRESENTATIVE AREAS

In recent years, scientists, land managers, and policy makers have become more aware of the importance of landscape "representation" to conserving biodiversity. One way to examine the adequacy of representation is the extent to which ecosystems are

protected in the Wilderness System. Only about 2% of the land area in the continental United States is protected as Wilderness; the situation in Virginia is even worse, with a mere 0.8% of the state as protected Wilderness.

COMMUNITY TYPES

Potential Wilderness Areas can provide data to better understand the dynamic nature and condition of Forest ecosystems and to provide reference points/benchmarks for comparisons with other altered environments. U.S. Climate Change Science Program (CCSP), Preliminary review of adaptation options for climate-sensitive ecosystems and resources, Product 4.4, pp. 1-3 and 3-4 (June 2008) (USDA and Forest Service are participants in the CCSP. They also can provide baseline and inventory data to meet certain legal and Congressional mandates (*e.g.*, sustained yield) related to protection of the natural world and public benefits.

Community types are a fundamental element pertaining to protecting diversity and sustainability. Potential Wilderness Areas should be analyzed to see that they protect all representative habitat types. (see Fleming, G.P. and P.P. Couling. 2001. Ecological Communities of the George Washington and Jefferson National Forests, Virginia: preliminary classification and description of vegetation types. Natural Heritage Tech. Rep. 01-14. Virginia Dept. of Conservation and Recreation, Division of Natural Heritage, Richmond. Unpublished report submitted to the USDA Forest Service. 372 pp., incorporated by reference.) All the vegetation/ecological community types on the GWNF identified by the VDNH should be represented in Wilderness areas. These ecological community types are important characteristics that need to be considered in making decisions regarding “capability”, value, and need of potential wilderness areas.

DISCRETION

A number of important inventoried and uninventoried roadless areas were improperly excluded from the Potential Wilderness inventory. The Forest Service (FS) excluded from the inventory a number of areas that the agency determined met the current road density criteria, based on other factors. The most frequently cited factors were the claim that areas lacked outstanding opportunities for solitude or recreation, size (less than 5,000 acres), existence of private subsurface mineral rights, or presence of improvements which easily could have been excluded from the area’s boundaries. We find that these criteria are arbitrary and capricious. None of these criteria would have excluded these areas from either RARE II or Roadless inventories. It is arbitrarily applied here with the result of reducing the inventory of lands which would qualify for Roadless Area protection, Wilderness Study designation in the Forest Plan or considered for Wilderness designation via appropriate legislation.

In addition, in revising the GWNF Plan and formulating the “inventory of potential Wilderness” the Forest Service is using a version of the National Forest Management Act regulations that have been found to be illegal and that is currently the subject of yet another lawsuit. Use of these Bush regulations is improper and unreasonable and an abuse of discretion. These illegal regulations do not properly and adequately implement the National Environmental Policy Act. These regulations fail to recognize the “on the

ground" impacts that the Forest Plan directs. They fail to sustain the Forest's diversity and fail to ensure the protection of viable populations of flora and fauna.

The FS needs to explore a range of alternatives to a draft plan, examine specific management alternatives in detail in the draft analysis which should include full comparative economic, ecological and data as required by the National Environmental Policy Act. No decisions with regard to the GWNF Forest Plan should be made under the current planning regulations.

SIGHTS and SOUNDS

The Potential Wilderness Review improperly applies a subjective and arbitrary "sights and sounds" criterion. The recreation opportunity spectrum (ROS) used to measure opportunities for solitude underestimated the degree of solitude and remoteness experienced by visitors. The FS guideline that only areas with a 2,500-acre "semi-primitive" (SP) core possess adequate solitude is arbitrary and capricious and not founded in any legislation, regulation, physical reality or objective analysis. The Wilderness Act is purposefully general in this area so as to allow for variants in discretion.

IRREGULAR BORDERS

It is difficult to believe that "irregular borders" are significantly problematic in this day and age. With the easy availability of GIS capability and GPS units, it is easier than ever to accurately ascertain just about any boundary. Congress regularly designates small and/or narrow areas, areas with irregular boundaries, or areas with appendages as Wilderness. The shape of numerous Wilderness areas in Oregon, with numerous attenuations and cherry-stems, is just one of many examples.

The use of shape ("Long, narrow areas are more difficult to preserve . . .") introduces an unreasonable bias into the inventory process on the GWNF. Land ownership patterns here are an inescapable artifact of the past; National Forest lands are generally on the narrow ridges and private lands on the extensive lower elevations. To now use the vagaries of past land acquisition (along with ancient geological upheavals) to exclude areas from a potential wilderness inventory is unreasonable and arbitrary.

NATURAL BARRIERS to ILLEGAL USE

Wilderness candidates should not be disqualified because they do not have steep slopes or natural barriers to illegal use. It is the Forest Service's responsibility to protect and manage Wilderness areas so as to preserve their natural conditions, 16 U.S.C. § 1131(c), and the agency's obligation to enforce the laws for ATV and other motorized use. It is not reasonable to require areas to provide their own barriers in order to qualify for Wilderness designation and heightened protection

ROADS and ROADLESS AREAS

The inventoried roadless areas and the newly identified areas that meet roadless criteria (the new "potential Wilderness areas" and all other qualifying areas, including all those VMTs discussed herein) should be managed consistent with the **2001 Roadless**

Area Conservation Rule. Most of these areas meet roadless criteria and therefore should be managed consistent with the 2001 Roadless Area Rule, which does not permit temporary road-building.

Temporary roads scar the landscape, detract from the natural, undisturbed character of in these areas, and create avenues for illegal motorized use and for introduction/spread of non-native invasive species. They are not truly "temporary" because they can take a very long time to regain natural appearance, particularly if cut into the slope, and because they often are used by the FS to justify future timber sales on the theory that the road-beds already exist. Temporary roads manifest harmful edge effects and result in the perforation, fracturization, and/or fragmentation of habitat and/or forest.

ROADS and ROAD INVENTORY

The **Forest-level "roads analysis"** conducted in 2003 is inadequate for making management decisions regarding the road system in this Plan revision and insufficient for addressing issues and concerns raised by the public. "This analysis pertains to only Forest Roads in maintenance levels 3, 4, or 5. However maintenance level 1 and 2 roads may be used for some specific analysis or to give the reader the complete picture of the Forest Road System." (pg. 3 of "Forest-level" analysis) But of all the FS roads on the Forest, only 568 miles are currently maintenance levels 3, 4, or 5 roads (see pp. 5-6). Fully 68.4% of the roads (1231 miles) are maintenance level 1 or 2 roads (see pg. 6). So this Forest-wide "roads analysis" for-the-most-part ignores <u>two-thirds</u> of the existing permanent FS roads on the Forest.

In addition, the national FS Roads Policy is not being implemented properly on the GWNF. The opportunities for decommissioning, closing, and revegetating roads in VMTs and PWAs have not been properly, fully, and fairly considered by the FS thus far. Planners have neither considered nor identified the minimum road system needed. The only roads that would normally be considered for decommissioning are maintenance level 1 and 2 roads, but by the agency's own admission this "analysis" does not pertain to those. Such a perfunctory and ommissive analysis cannot possibly achieve the stated "objectives" of the FS roads policy. This "analysis" simply does not meaningfully address, provide reasonable rationale for, or identify opportunities regarding the significant issues of decommissioning and closing and constructing and reconstructing roads on the Forest.

Roads that have been closed, overgrown, abandoned and function only as trails should not be considered roads at all and not considered in road density analysis in the Potential Wilderness Inventory. This would give the fairest and most accurate appraisal for areas in any consideration of Wilderness Study designation or in seeking candidates for federal designation as wilderness.

ROADS as BOUNDARIES

The propriety or desirability of using roads or the NF boundary as boundaries for roadless areas or PWAs of VMTs has been questioned by some. If this is problematic

then we suggest pulling back the boundaries 100 feet from roads and the NF boundary. This will allow roadside vehicle camping and accommodate some firewood collecting without directly violating “Wilderness” values. This pull back of boundaries will also allow flexibility as far as the use of fire fighting equipment.

SOLITUDE

Many areas have been omitted from the Potential Wilderness Inventory by claiming there are no outstanding opportunities for solitude. This criterion is highly subjective and arbitrary as it cannot effectively be documented. Wild Virginia members have found solitude and isolation in all of the mentioned Virginia Mountain Treasure areas, including those excluded from the inventory.

MINERAL RIGHTS

Your evaluation of Potential Wilderness Areas arbitrarily uses mineral rights as an exclusionary factor. The existence of private mineral rights, alone, is insufficient rationale for excluding areas from the inventory. The Handbook’s inventory criteria for Eastern areas state: “The area has existing or attainable NFS ownership patterns, both surface and subsurface, that could ensure perpetuation of identified wilderness characteristics.” FSH 1909.12 Ch.71.12(3). As the GW Inventory Guidance recognized, all minerals are attainable if the FS and land owner are willing. The unwillingness of the FS to establish this fact and consider the purchase of mineral rights, of itself cannot exclude areas from the inventory.

As the 1984 GAO report makes clear, the Forest Service should make information about private mineral rights available to Congress, not usurp Congress’ prerogative to consider Wilderness candidates. Therefore, the existence of private mineral rights is not a proper reason to exclude areas from the inventory of potential wilderness areas that subsequently will be evaluated.

The GW Guidance quoted from a 1984 Government Accounting Office (GAO) report on privately-owned minerals in Wilderness, concludes that “subsurface rights lend themselves better to being avoided in any consideration of potential wilderness areas,” and states that areas with less than 70% federal mineral ownership would not be included in the inventory. The 70% benchmark is totally arbitrary and capricious, excluding worthy areas from consideration. The GAO further states, “We believe that the Congress should have the opportunity to consider as many areas as possible for inclusion in the wilderness system including areas with private mineral rights.”

If the GW is going to look to the GAO report for guidance, then the report clearly requests the Forest Service to make information about private mineral rights available to Congress, not to usurp Congress’ prerogative to consider Wilderness candidates. Therefore, the existence of private mineral rights was not a proper reason to exclude areas from the inventory of areas which will be evaluated.
The Inventory Guidance seemed to recognize this, stating that mineral rights “may be used to evaluate areas rather than to identify areas on the inventory.” Inventory Guidance at 13.

FRAGMENTATION

Habitat and forest fragmentation (including edge effects) and ecological sustainability must be fully considered and analyzed in the review of Potential Wilderness Area characteristics, capability, value of, and need for such areas. In *Krichbaum v. Kelley*, 844 F. Supp. 1107, 1116 (W.D.Va.1994) the court held that general issues of forest fragmentation and edge effects were more appropriately addressed at the plan-level stage rather than at the project-level stage (regarding a preliminary injunction to stop a site-specific timber sale project). Planning for the GW needs to follow that direction.

Wild Virginia is concerned about the supply and viability of unfragmented habitat and interior forest conditions. Various taxa (e.g., herbaceous flora, amphibians, reptiles) are negatively impacted when forests lack an adequate and high quality component of these features. We are concerned that the revised plan will direct forest management activities that diminish the supply and viability of unfragmented and interior forest conditions. Similarly, we are concerned the revised plan will direct forest management activities that diminish remote areas of habitat, which various taxa occupy.

Roadless Areas and Potential Wilderness Areas hold the greatest potential to function as areas of undisrupted “control” or “benchmark areas” with which to make monitored comparisons to other areas. This should be adopted in the plan as a critical component of truly scientific forest management (Christensen *et al*. 1996. The Report of the Ecological Society of America Committee on the Scientific Basis for Ecosystem Management. Ecological Applications 6: 665-691). Wilderness areas serve as a land laboratory, a metric for gauging effects to other lands under various active management regimes. Yet there is only a single Wilderness control area even over thirty-thousand acres in size (the Cranberry in West Virginia) for hundreds of miles.

Large-scale reestablishment of unmanipulated forest conditions is perhaps the greatest single improvement and assistance to biodiversity and ecological integrity that we can implement (see Noss, R. 1990. "What Can Wilderness Do For Biodiversity?" pp. 49-61 in USDA FS General Technical Report SE-66. Southeastern Forest Experiment Station, Asheville, NC; Noss, R. 1991. Wilderness recovery: Thinking big in restoration ecology. The Environmental Professional 13: 225-234; and Noss, R. 1995. Maintaining Ecological Integrity in Representative Reserve Networks. World Wildlife Fund, Washington, DC. 77 pp.).

At this time, the prime opportunities for the reestablishment of even moderately large unfragmented wildlands in the Central Appalachians are found in blocks of low road-density land in the George Washington, Jefferson, and Monongahela National Forests. One primary conservation vision is to sustain native ecological systems and diversity by allowing for the landscape-level re-emergence of natural old-growth forest. This can best be achieved by

1. creating a Potential Wilderness Inventory which is both extensive and inclusive of all of the areas thus far recommended and those included in this comment letter,

2. working to maintain, restore, and connect existing large habitat blocks through 'passive' management such as strictly protecting all Virginia Mountain Treasure areas,
3. allowing natural processes to operate unimpeded through such actions as road closure and revegetation, invasive species removal, and the addition of woody debris to streams, and
4. creating a plan for land acquisitions, mineral rights acquisitions and road closures that would allow larger and more contiguous Potential Wilderness areas to be created.

OLD GROWTH

Existing old growth inventories in the forest are seriously deficient. This analysis should have been carried out prior to and considered in Potential Wilderness analysis. While "on the ground" old growth inventories are being required before possible old growth is logged, the GW still proposes to allow two types of verified, existing old growth to be cut. Existing old growth forest is extremely important and rare in the Southeast and should not be logged. Logging existing old growth cannot be justified by the claim that there is plenty of old growth elsewhere on the forest, since the acreage of old growth claimed to exist is based only on stand ages in the Forest Service's database. The database is of questionable accuracy and has not been ground-truthed, so no one knows how much old growth actually exists. The existence of old growth needs to part of the Potential Wilderness analysis.

Known old growth, such as Peters Mountain North, Frozen Knob and other sites identified by the Virginia Division of Natural Heritage, old growth documented by the public, and old growth identified by the Forest Service in field inventories, should be placed into Special Biological Areas.

PRIMITIVE RECREATION

Wild Virginia is concerned that the potential for primitive recreation opportunities was not adequately considered in the Potential Wilderness Inventory. The Forest and Rangeland Renewable Resources Planning Act of 1974 directed the Secretary of Agriculture to prepare a Renewable Resources Assessment in 1975 with updates in 1979 and each 10th year thereafter. These assessments are to include "an analysis of present and anticipated uses, demand for, and supply of the renewable resources, with consideration of the international resource situation, and an emphasis of pertinent supply, demand and price relationships trends".

"The sense of creativeness, refreshment and pleasure which the recreationist has while recreating or having a good time can be viewed as the recreationist realizing satisfactory experiences. The recreationist attains these satisfactory experiences by participating in preferred recreation activities in preferred surroundings or settings. Therefore although the recreation resource manager manages settings, he or she does so to provide opportunities for recreation experiences and the benefits those experiences produce for individuals and society. Those experiences are influenced by many factors: the settings, the activities, other resources present, activities by managers, and by the values, expectations and other characteristics of the

recreationists. These factors interrelate to define outdoor recreationists' needs and the way these needs are met by management action.

Managing for recreation requires different kinds of data and management concepts than does most other activities. While recreation must have a physical base of land or water, the product - recreation experience - is a personal or social phenomenon. Although the management is resource based, the actual recreational activities are a result of people, their perceptions, wants, and behavior.

The word opportunity is defined as a combination of circumstances favorable for a purpose. The purpose or goal of the recreationist, as discussed above, is to realize satisfying experiences. This is done by participating in preferred activities in preferred environmental settings. Thus, recreation opportunity is the availability of a real choice for a user to participate in a preferred activity within a preferred setting, in order to realize those satisfying experiences which are desired.

While the goal of the recreationist is to obtain satisfying experiences, the goal of the recreation resource manager becomes one of providing the opportunities for obtaining these experiences. By managing the natural resource, and the activities that occur within it, the manager is providing the opportunities for recreation experiences to take place. "(USFS ROS Users Guide -1982)

ROS inventory identifies and defines the ROS classes using six criteria: size, naturalness, remoteness, social encounters, access and distance from road. These six criteria reflect the types of settings and experience opportunities the recreationist would expect to encounter. Primitive Recreation is defined by areas with very high degree of remoteness and naturalness; very little or no motorized use within area; 5000 ha or more in size; 8 km or more from a 'rough' dirt or gravel road.

We believe it is fitting and proper and not beyond the scope of the GWNF Forest Plan revision process to consider the full range of the ROS and thoroughly analyze any areas that would quality as most closely fulfilling or approximating the criteria for primitive recreational opportunities in the GW. The opportune time for such analysis is during the Potential Wilderness Inventory analysis.

The Shenandoah Mountain complex of roadless, potential wilderness and Virginia Mountain Treasure areas should be identified and recognized as having the greatest primitive recreation potential in the forest. All of these areas combined represent and include approximately 300,000 acres. Specifically, Little River’s (see below) 29,000+ acres fulfill all of the 12 Criteria and factors of primitive recreation with the only exception that the core of the areas lies just less than 4 miles from any roads.

This fact notwithstanding, the GWNF planners have a responsibility to identify Little River Roadless Area as the area in the GWNF that most completely meets the definition and fulfills the recreational opportunities of primitive recreation. Little River should be given a level of protection that allow no activities within the area which would diminish or compromise the primitive quality of this area. Moreover, planners have the responsibility to make creative proposals for creating primitive recreation opportunities on

Shenandoah Mountain by proposing specific, strategic and reasoned road closures and decommissionings and land acquisitions which would create a contiguous, roadless potential wilderness area which would fulfill all criteria for primitive recreation in the George Washington National Forest.

ADDITIONS to EXISTING WILDERNESS AREAS

Any analysis of areas that would be considered additions to existing wilderness areas should face a different level of analysis than that which applies directly to Potential Wilderness Areas. Because adding to existing areas should be considered a priority for conservation and designation strategies, their inclusion should be approached more aggressively. The increase of wilderness values which they so obviously bring to the integrity of the entire area should be considered.

For example **Lynn Hollow** on the west side of Ramsey's Draft Addition is an excellent and important extension to Ramsey's Draft, but, as the January summary indicates, it is viewed as not a good area to recommend because of underlying private mineral rights. However, the Forest Service could recommend the area for Wilderness or Wilderness Study and manage the area accordingly under the revised plan, thereby ensuring that the agency does all within its power to maintain the wilderness character of the area. They could also begin preliminary negotiations to purchase the outstanding mineral rights.

The **Three Ridges Additions** consists of four small additions (about 300 acres total) to the existing Wilderness. It is unclear why the GW does not plan to recommend these additions. To the extent that the decision was driven by the "sights and sounds" and boundary-related factors listed in the "Capability" chart, those are not proper grounds, considering as they might be applied to the entire area, wilderness and additions in their totality. The addition of these areas would increase the wilderness values for the entire area combined.

Concerning the **Rough Mountain Addition,** there is again no clear reason why the GW does not intend to recommend this area for wilderness consideration. Applying any rationale to the entire "Rough Mountain plus Addition" area, the addition of this area would only increase wilderness values of the entire Rough Mountain.

SPECIFIC AREAS

Little River Roadless Area (27,292 ac.) is not only the largest inventoried roadless area in Virginia; it is the largest roadless area in the entire central and southern Appalachians. If the adjacent uninventoried areas are added in (as they should), Little River weighs in at more than 30,000 acres. One would have to travel all the way to New Hampshire or south to Georgia to find a larger, geographically intact roadless area.

Little River Roadless Area contains the headwaters of both Little River and North River, providing drinking water for Harrisonburg, Bridgewater and Staunton before joining the

rest of the Shenandoah River watershed. It contains the two largest Virginia Natural Heritage conservation sites in the GW, with a diversity of natural communities and rare species, including the Cowknob Salamander (Plethodon punctatus), the endemic millipede, Shenandoah Mountain Xystodermid (Nannaria Shenandoah) and the globally-rare variety of Least Trillium (Trillium pusillum var. monticulum).

Shenandoah Mountain is also known for its high elevation old growth and for breeding populations of disjunct northern birds such as the Red Crossbill (Loxia curvirostra), which has a circumpolar range, as well as others that breed at high elevations on the Allegheny Mountains and on Whitetop and Mt. Rogers. (Robert Mueller: Forests of the Central Appalachians, http://asecular.com/forests/reddish.htm.)

Trails run generally east-west and rise nearly 2800 feet to 4350 feet at Reddish Knob, the highest point in the George Washington National Forest. Reddish Knob was the site chosen by President Clinton as a setting to sign the historic 2001 Roadless Area Conservation Rule, protecting Little River and over 58 million acres in National Forests from most timber harvesting and road building.

The entire Little River area is clearly the gem of the GW. All of the 27,292/30,000 acres, as well as all roadless acres of the Shenandoah Mountain Complex (when considered as a single unit), qualify for Potential Wilderness. They should be specified as "wilderness study areas" to fully designate and protect their ecological integrity (see "fragmentation" section above), unique biodiversity and remote characteristics.

High Knob (18,400 acres) including **Dry River** and **Skidmore Fork**, is one of the largest and best Potential Wilderness Areas on the Forest. It has no characteristics which should exclude it from consideration as wilderness. It is irrelevant for the purposes of the inventory that West Virginia Department of Natural Resources (WVDNR) has reservations about Wilderness designation for this area because these are beyond the scope of the inventory. Their comments are appropriate as comments on the inventory, yet they are evidently, arbitrarily and capriciously being used as rationale for excluding this prime area from wilderness consideration .

While the WVDNR may have a vested interest in opposing Wilderness designations (such designations can be misperceived as getting in the way of work projects and thereby interfere with "appropriate management"), these should not be allowed to override a greater public good that protection High Knob can serve for all Americans.

The inventory also fails to note that the **Skidmore Fork** (5,700 acres) portion of High Knob is solely in Virginia and would be considered on its own worthy merits for wilderness consideration. Skidmore Fork contains 1200 acres of old growth which the Virginia Division of Natural Heritage describes as 'an exemplary natural community". VDNH has also identified five different "extremely rare" species within the 3,691 Special Biological Area here.

It should also be noted that the **Dry River** (12,939 acres) portion of High Knob contains over 5000 acres of old growth acreage and a 3,333 acre Special Biological Area, home to the Cowknob salamander. This area is unique for the combination of rare habitat and excellent trail system. Here the total is greater than the sum of its parts, as worthy as they are: High Knob should be considered for wilderness designation and the FS should begin negotiations with WVDNR for including the entire area for Wilderness designation.

Jerkemtight/Benson Run (31,984 acres) is included in the draft inventory, but 5,467 acres of Benson Run are excluded, citing excessive road density. Although this is a good example of altering boundaries in order to maximize the size of areas for Potential Wilderness, independent road density analysis (S. Bamford) shows the entire area with a density small enough (.49 miles /1000 acres) for the entire area to qualify for the Potential Wilderness Inventory. The inventory should reflect this by including the entire area as Potential Wilderness.

Laurel Fork (10,324 acres) is truly unique and very deserving of wilderness designation. Two thirds of the area is a Special Biological Area due to the presence of 25 rare species, as ranked by the Virginia Division of Natural Heritage, and the Northern Flying Squirrel, a federally listed endangered species. It's remote location, excellent trail system and rare habitat makes this area an absolutely outstanding candidate for Wilderness. The January, 2009 capability study listed Laurel Fork as among the best Wilderness candidates. In fact the only reference to climate change in the entire GW planning process appears here, as a reason *not* to protect an area, when in fact, it could perhaps more easily be argued as rationale *for* its protection. Widely accepted (including by the Forest Service) strategies to improve species' resilience and adaptation to climate change include reducing other stressors (such as forest fragmentation from road construction and logging and threats from invasive species) and protecting high-elevation refuges [U.S. Climate Change Science Program (CCSP), Preliminary review of adaptation options for climate-sensitive ecosystems and resources, Product 4.4, pp. 1-3 and 3-4 (June 2008), noting that USDA and Forest Service are participants in the CCSP]. If a primary goal for Laurel Fork is to help its species survive climate change, then Wilderness designation may be the best way to accomplish that goal. Laurel Fork deserves recommendation for wilderness designation by the USFS.

Big Schloss (31,204 acres) is one of the largest roadless areas anywhere in the eastern United States. It deserves to be considered for wilderness for this reason alone. However, arbitrary road density standards seem to remove it from consideration.

Another way to approach this is to find smaller areas within Big Schloss which qualify for wilderness consideration. **Three High Heads** (5,000+ acres) is a good example, but was not included in the Potential Wilderness Inventory. It meets all the criteria and, therefore, should be considered a wilderness candidate.

The other possibility is to consider strategic permanent road closures, in order for the entire area to qualify. For instance, Wild Virginia has in the past recommended permanently closing FS 93 and Paddy Cove Lane in order to afford the highest protection for rare and vulnerable species. This would reduce the road density in the entire Big Schloss Area, allowing it to be included in the Potential Wilderness Inventory in its entirety.

Note that some citizens have advocated for the designation of a Big Schloss National Scenic Area (30,129 ac.), perhaps containing a Three High Heads Wilderness (*ca*. 5,000 acres). While we agree that Three High Heads deserves wilderness designation, and although establishing strict protections for this entire area is beneficial and necessary, we urge the Forest Service to instead consider the value of the entire Big Schloss Area. The possible designation of the area as a National Scenic Area (and access "improvements" such as connector trails) could potentially result in greater visitation with concomitant increased and significant collection and depredation pressures upon various rare and vulnerable species. Such a situation can and should be avoided. It is inevitable that growing numbers of Americans (such as Northern Virginians) will be seeking places for recreation in the great outdoors that are close to metropolitan areas and population centers; we do not need to exacerbate this situation and make it worse (as regards rare and vulnerable species). There are effective ways, including wilderness and/or special biological area designation or simple road closure/decommissioning to protect populations of rare and vulnerable species and the Big Schloss area without naming and advertising it as a National Scenic Area.

Three Sisters (13,028-9,871 acres) is an ideal candidate for wilderness consideration. Our analysis shows that it fulfills all of the criteria for Wilderness designation. Boundaries could easily be considered that limit gas and powerline easements. Besides being the largest roadless area in the Pedlar District, it contains both native trout streams and a full length stretch of the Appalachian Trail, excluding the shelters and access on the north and south extremities. Three Sisters also borders the James River and designation would protect the northern slope of the gorge. Please reconsider this entire area for Wilderness recommendation.

Beech Lick Knob (14,000-17,000 acres) appears to have been reduced in size from the total area which qualifies for an aggressive application of Potential Wilderness analysis. This area was recognized in the January 2009 report as being an excellent candidate for Wilderness designation. The only reason cited in the January summary for not recommending it is that the area is currently suitable for timber management. This is an arbitrary and capricious application of Potential Wilderness criteria - Beech Lick Knob does qualify for wilderness consideration using all major criteria.

Note that Beech Lick Knob is not readily accessible for logging. The majority of the area is located more than ½ mile from open roads, within the riparian corridor and on slopes over 30%. This demonstrates why the area is still roadless despite being totally unrecognized by the Forest Service up to now. Designating this area as Recommended Wilderness would remove only a small fraction (3%) of the desired 350,000-acre timber

base. And virtually no land that is accessible, recently has been managed for timber, and realistically is likely to be logged in any significant way in the future would be included in the Potential Wilderness Inventory.

Little Cow Knob (5,305 ac.) has outstanding opportunities for solitude and primitive recreation. It is one of the most remote areas on the entire Forest, centered in the western interior of Shenandoah Mountain. The area is steep and rugged with numerous drainages. The 1584 acre special biological area, rare species, and over 2000 acres of old-growth forest make this area important for protection. Little Cow Knob is both greater than 5000 acres and meets the 2500- Acre Semi-Primitive core as specified by the Southern Regional Forester's May 1995 guidance letter. The USFS should prioritize purchasing outstanding mineral rights in the area and, in the meantime, include Little Cow Knob in its Potential Wilderness Inventory.

Broad Run (5,047 ac.) is a 5,000+ -acre area containing only 0.109-.22miles of road (see VMT Review and S. Bamford analysis), yet the Forest Service has incorrectly given it a Roaded Natural classification. It also meets the 2,500- Acre Semi-Primitive core as specified by the Southern Regional Forester's May 1995 guidance letter. Broad Run is steep and rugged with numerous drainages. Broad Run contains the 2300 acres Shenandoah Crest Special Biological Area and 2000 acres of old growth which clearly present opportunities for unconfined backcountry-type or primitive recreation, and isolation from human activities. It contains few areas of mineral rights. It also should be included in your Potential Wilderness Inventory.

Kretchie Mountain (6,677 ac.), has some of the most remote areas on the entire Forest, centered as it is in the interior of Shenandoah Mountain. The FS determines that Kretchie Mountain meets current road density criteria for Potential Wilderness classification, yet it has been incorrectly given a ROS classification of Roaded Natural. It contains Cow Run Special Biological Area and is a Virginia Natural Heritage conservation site. It should be a priority to purchase included mineral rights and for now should be included in the Potential Wilderness Inventory.

Cove Mountain (2,572 ac.) on the West Virginia western edge of the GW contains no trails which makes bushwhacking, hunting, primitive recreation and solitude all of the highest quality. Cove Mountain has a 1,520 acre SPNM core. At the April 8, 2009 IDT meeting, the recreation staff area recommended that the SPNM area and a ½ mile buffer be identified as unsuitable for permanent road-building and timber production. None of the SPNM area is currently suitable. There are no privately owned mineral rights and no private land within its boundaries. These characteristics qualify Cove Mountain to be included in the Potential Wilderness Inventory.

Jonnies Knob (2,499 ac.) has outstanding cliffs and rock outcrops, as well as outstanding views and provides opportunities for solitude and primitive and unconfined recreation. It has been managed as such (Remote Highlands) since the 1993 Plan with just under half of it considered semi-primitive, non-motorized. There are no subsurface mineral rights in the area. Although less than 5,000 acres, Johnnies Knob is a steep and

rugged area with numerous intermittent streams which should be preserved due to its terrain and natural conditions. In addition, the conditions here offer refuge to vulnerable species, including hibernacula for the Eastern Forest Rattlesnake (*Crotalus horridus*). Johnnies Knob was part of the Big Schloss RARE II roadless area and, under the 1993 Plan, was managed under MA 9 (Remote Highlands).

Mud Run Mountain (4,303 ac.) is also very remote and contains no trails. It contains 2,928 Semi Primitive acres at its core, thereby fulfilling the 2,500-acre core required by the FS. See Final Process Paper, GWNF, Guidance on How to Conduct the "Potential Wilderness Area Inventory" for the Revision to the Revised GW Forest Plan, at 19 (8/21/2008) (hereinafter Inventory Guidance). The VMT Review treated other areas with 2,500 SP acres (including 2,240 Semi-primitive non-motorized acres) as satisfying the solitude and recreation criteria and the same criteria should be applied to Mud Run Mountain. The FS recreation staff, at the April 8, 2009 IDT meeting, recommended the SPNM area and a ½ mile buffer be identified as unsuitable for permanent road-building and timber production (see below for further discussion of large SPNM areas identified by the recreation staff). Because it contains no private mineral rights or inholdings and is nearly 5,000 acres in size, it should not be excluded from the Potential Wilderness Inventory.

Short Mountain (4,647 ac.), sandwiched between Rough Mountain and Rich Hole Wilderness and with limited road access, has outstanding opportunities for solitude, remoteness, or primitive recreation. It provides a vital linkage between the two wilderness areas, separated only by railroad tracks. The presence of special biological areas and rare species also provide a significant recreational opportunity. Short Mountain contains over a thousand Semi-primitive acres. Short Mountain and the Rich Hole addition (aka Mill Mountain) along with Rich Hole and Rough Mountain Wildernesses provide a significant opportunity for a large block of "back-country" or wildlands that is rare in the East. For these reasons, it should be included in the Potential Wilderness Inventory.

Dunkle Knob (8,398 ac.) has roadless characteristics which warrant inclusion in the Potential Wilderness Inventory, despite containing a shooting range on the south west edge of the area, which could be easily excluded from the area. It contains the 2000 acre Shenandoah Crest Special Biological Area which includes habitat for the Cowknob salamander and black bear. Existing mineral rights (as previously stated) should not prevent inclusion in the inventory.

Hogpen Mountain (9,211ac) has 2,635 Semi Primitive Non Motorized acres, none of which is suitable for timber production, according to the chart distributed at the April 8, 2009 IDT meeting. At that meeting, the George Washington National Forest's recreation staff recommended this area be designated as a special area focusing on backcountry recreation. Although the area contains Slate Lick Dam and a utility right-of-way, boundaries could easily be drawn to exclude them. The areas of private mineral rights should not, of themselves, exclude Hogpen Mountain from the Potential Wilderness inventory.

Great North Mountain (6,662 ac.) is steep and rugged with numerous drainages. It offers rocky outcrops offering outstanding views, ample feelings of solitude, a high degree of naturalness, opportunities for unconfined backcountry-type or primitive recreation and isolation from human activities. The chart handed out at the April 8, 2009 IDT meeting lists 2,120 acres of Semi-Primitive Non-Motorized acres and 1,726 acres of Semi-Primitive Motorized for a total of 3,846 acres which meets the 2,500-acre Semi-Primitive requirement.

The Review claims there is an excessive road density here, but analysis by Sherman Bamford, Virginia Forest Watch and Southern Environmental Law Center disputes this figure and suggests that this area does meet road density standards for Potential Wilderness. The fact that a utility corridor exists in the area can easily be solved by considering only the area south of the corridor. Regardless, Great North Mountain was part of the Big Schloss RARE II roadless area and was inexplicably dropped from the inventoried Big Schloss roadless area between the draft and final revised plan in 1993 (see FEIS for 1993 Plan at C-15). It all needs to be included in the Potential Wilderness Inventory.

Falls Ridge (7,737 ac.) is one of the largest of the GW's uninventoried roadless areas. Like Great North Mountain, it has had its boundaries drawn to include a utility right of way which, if excluded, leaves a sufficiently large area with sufficient road density (again, FS figures are unsubstantiated given Mr. Bamford's analysis) and low subsurface mineral rights. Given the area's significant Semi-Primitive Non-Motorized acreage, this area should be included in the Potential Wilderness Inventory.

Church Mountain VMT (11,995 ac.) was excluded from the Potential Wilderness Inventory because of road density and presence of a cleared utility right of way. This is a very large area with 6,457 acres of semi-primitive land, and 2,199 acres of Semi-Primitive Non-Motorized area. If the boundary were configured to not include roads on the eastern side, this area would easily meet road density requirements. Given its size, the existing utility corridor should not exempt it from the Potential Wilderness Inventory. If a boundary were drawn south of the existing utility corridor, clearly it would meet requirements.

Long Mountain VMT (10,503 ac.) is a relatively large area with a large 2,425 acres designated as Semi-Primitive Non-Motorized area plus 1,915 acres Semi-Primitive Motorized. It was recommended by the FS recreation staff at the April 8, 2009 IDT meeting for designation as unsuitable for permanent road-construction and timber production. The claim of excessive road density is unsubstantiated. Utility corridors should not be included in roaded acerage and the FS boundaries are subjectively drawn to include the corridor in this area. The corridor doesn't need to be included. This is a clear example of the necessity of a clearer and more detailed analysis necessary for the Potential Wilderness Inventory.

Catback Mountain/Duncan Knob (6,386 ac.) contains two parallel ridges with a diversity of terrain. It includes Scothorn Gap Shale Barren Special Biological Area and Waterfall Mountain Cliffs, a Virginia Division of Natural Heritage conservation site. It has all of the characteristics and qualifications necessary for inclusion in the Potential Wilderness Inventory. It is large enough, contains mostly Semi Primitive acreage and its road density is less than .4 miles per 1000 acres. Its trails afford great solitude and have outstanding scenic characteristics, such as Duncan Knob. It was a mistake to omit Catback Mountain from the Potential Wilderness Inventory.

Sideling Hill (7,155 ac.) is a seven-mile-long ridge that helps bridge the Shenandoah Mountain and Great North Mountain GWNF lands and the Virginia Mountain Treasure complexes found there. It is one of the larger Mountain Treasures that has thus far been excluded from the Potential Wilderness Inventory. It has a sufficiently low road density at under .45 miles per thousand acres (Bamford). One can experience feelings of solitude, a high degree of naturalness, opportunities for unconfined backcountry-type or primitive recreation, and isolation from human activities in this area. It is good distance from population centers such as Staunton, Warm Springs, and Lexington. It contains no subsurface mineral rights or inholdings and includes 3,389 Semi-Primitive acres. The southern end forms the dramatic backdrop for US 39 as it wends its way through Panther Gap. This Treasure includes the parallel ridge of Mill Mountain on its southeast flank, as well as headwaters for Panther Gap Draft, Ingram Draft, and Clayton Mill Creek.

The Mill Mountain Trail travels eight miles up Mill Mountain to Ingram Draft before crossing over to run along the crest of Sideling Hill to FDR 61. Around midway along this trail, large rock outcroppings offer visitors stunning views of Great and Little North Mountains, the Marble Valley of the Calfpasture River, the hamlet of Goshen, and the Maury River Gap through the mountains to the southeast. The Sam Judd Ramsey Trail traverses the northern part of Sideling Hill. There is absolutely no reason that Sidling Hill should not be included in the Potential Wilderness Inventory.

Snake Run Ridge (8,166 acres) contains some of the ‘wildest’ settings anywhere on the GWNF. This area contains steep and rugged slopes dissected by numerous drainages. The fact that the area contains two wild trout streams, Crow Run and Little Crow Run, and 3,600 acres of old growth identified by the Virginia Division of Natural Heritage as some of the largest in the Central Appalachians demonstrates its values as Potential Wilderness (Wilson, I.T. 2000. Biological Diversity Protection on the George Washington National Forest, First Supplement; Technical Report 00-10. Virginia Department of Conservation and Recreation, Division of Natural Heritage, Richmond, VA.). There are no open or maintained roads in the area. The area contains no subsurface mineral rights or inholdings. Bushwhacking across this area offers a high degree of naturalness, as well as ample feelings of solitude, opportunities for primitive recreation, and isolation from human activities.

This area is also very diverse, with 410 vascular plant taxa recorded from 52 plots; compare this to the 274 taxa from 49 plots at an even larger GWNF Blue ridge site. And the low number of exotics in this data set “reflect the generally excellent condition of the

Peters Mountain landscape . . .” (Fleming, G.P. and W.H. Moorhead III. 2000. Plant communities and ecological land units of the Peters Mountain area, James River Ranger District, George Washington and Jefferson National Forests, Virginia. Natural Heritage Tech. Rep. 00-07, Virginia Dept. of Conservation and Recreation, Division of Natural Heritage, Richmond. Unpublished report submitted to the USDA Forest Service).

Snake Run Ridge was described as “semi-primitive natural appearing” in the recreation analysis for the Southern Appalachian Assessment, ca. 1995. The abandoned road beds in the area fail to meet the definition of Traffic Service Level B and C roads. The boundaries considered in Virginia Mountain Treasurers were specifically configured to keep road density to a minimum.

Despite some recent logging in the area, Snake Run Ridge maintains its primitive characteristics. The abandoned roads in the area should be permanently decommissioned and maintained only as foot trails. The entire area should be included in the Potential Wilderness Inventory.

Southern Massanutten Mountain (11,721 ac.) contains 3,871 acres that are Semi-Primitive Non-Motorized acres and over 2000 acres of old growth. Its hiking trail system, including Massanutten Mountain Trail, is one of the finest in the forest. Its primitive character and roadless acreage warrant its inclusion in the Primitive Wilderness Inventory, despite containing private mineral rights.

The Friar (3,976 ac.), like Southern Massanutten Mountain, has been determined by the USFS to meet roadless criteria. The 1993 plan revision documented that “The Friars area is extremely steep and rugged. The interior is relatively inaccessible and remote for its small size.” 1993 FEIS for Revised LRMP, App. C-51 obviously identified the Friar as having outstanding opportunities for solitude. No road construction or timber harvesting has occurred in these areas since the 1993 inventory. Therefore, there is no rationale for excluding them from the Potential Wilderness Inventory.

Slatey Mountain (4,100 acres) is an area whose steep drainages and hollows are virtually undisturbed and clearly Semi-Primitive. Although it is less than 5000 acres, it is predominantly unroaded, natural and primitive. Slatey Mountain contains significant amounts of semi-primitive acreage (previously inventoried as SPM 2 lands). It should be inventoried as a Potential Wilderness Area.

Walker Mountain (5,596 acres) is bisected by an administrative road which remains closed, overgrown, abandoned and impassable by passenger vehicles. It now functions only as a trail. The proposed new road construction for the Back Draft Timber Sale linking this area to Clayton Mills Road is, at the top eastern ridge, extremely steep and contains beautiful and fragile geologic formations. The area proposed for reconstruction is closed, abandoned and overgrown. If this and the so-called Walker Mountain Road were permanently closed and decommissioned, this area would totally qualify for inclusion in the Potential Wilderness Inventory. In our site visit for the Back Draft Timber Sale, we experienced feelings of solitude, a high degree of naturalness, opportunities

for unconfined backcountry-type or primitive recreation, and isolation from human activities in this area in addition to black bears and timber rattlesnakes.

Warm Springs Mountain (7,832 acres) is somewhat of a stand-alone ridge, encompassing much of both the eastern and western slopes of Warm Springs Mountain. This area can be preserved due to the content and context of its physical terrain, natural conditions, and landscape features. Its location in Bath County, with low human population and a very high proportion of forested land, is certainly conducive to the perpetuation of wilderness values. It has an excellent trail system yet this area is regaining a natural, untrammeled appearance; human alterations existing in the area are being affected by the forces of nature and are disappearing or muted. Warm Springs Mountain seems to meet road density standards (Bamford) but if road density is somehow considered problematic for the inclusion of Warm Springs Mountain on the Potential Wilderness Inventory, then examine an area with a boundary readjustment that excludes most or all of road FS600.

Signal Knob (5,471 acres) lies at the far northwest end of Massanutten Mountain. Besides having historical significance, Signal Knob contains two Special Biological Areas: Signal Knob Shale Barren and Mudhole Bog. The Virginia Division of Natural Heritage would like to see these boundaries expanded and we agree. The area includes 2,512 Semi-Primitive acres and has no outstanding private mineral rights. This area was one of the priority Semi Primitive Motorized areas on the forest identified in the recreation staff's chart distributed at the April 8 IDT meeting. In addition, only 15% of the Semi-Primitive area is suitable for timber production. Signal Knob's low road density meets Potential Wilderness requirements.

There is some ambiguity regarding the electronic installation and utility right of way in the area which could be excluded from the area by appropriately placed boundaries for Potential Wilderness analysis.

Scaffold Run (aka Galford Gap, 6,600 acres) is actually part of a large 12,600 acre area including 6,000 acres of contiguous unroaded Monongahela National Forest lands in West Virginia. It is one of the more excellent Wilderness candidates on the Forest as it is located in one of the most remote areas in the East based on distance from 4-lane roads, the very low population density of the surrounding counties, and the high proportion of public lands nearby. It lies at the heart of the Central Appalachians with rugged mountainous terrain all around. This site includes the highest elevations on the entire GWNF. It is also in some formulations considered to be part of the Allegheny Mountain physiographic province (little represented in Virginia and in this Forest). It contains significant old growth and is one of the rare areas in Virginia that is home to a red spruce population. It contains sufficient road density to include it in the potential Wilderness Inventory and to be recommended for Wilderness Study.

Adams Peak (7,283 ac.) has outstanding scenic characteristics, such as wonderful views of hoodoos and vistas at various locations. It also affords solitude, remote rugged habitat and refuge to the vulnerable Eastern Forest Rattlesnake (*Crotalus horridus*).

The more remote extent of FS104 could easily be closed and decommissioned, creating an area which would meet all of the criteria for inclusion in the Potential Wilderness Inventory.

CONCLUSION

The GW is considered the wildest and least fragmented forest in the East, with the most roadless acreage of any National Forest east of the Mississippi River (see, *e.g*., Bolgiano, C. 1998. The Appalachian Forest: A Search for Roots and Renewal. Mechanicsburg, PA: Stackpole Press). So the GW planners began with an enormous pool of roadless or "potential Wilderness" areas to consider for recommendation for Wilderness designation: at least 372,631 acres in 37 areas (see FS August 2008 inventory) or 63 VMT areas of approximately 602,000 acres.

The agency must do all within its power to maintain the wilderness character of the Potential Wilderness areas. It is the Forest Service's responsibility to protect and manage Wilderness areas so as to preserve their natural conditions, 16 U.S.C. § 1131(c). This includes the agency's obligation to enforce the laws for ATV and other motorized use, as well as controlling mineral/gas development.

We appreciate all of the time and effort that has gone into the analysis thus far. Yet the January 2009 summary indicates the GW planners are likely to recommend only about 24,300 acres for Wilderness designation. As this document attests, many more areas and acreage should be included. This relatively paltry amount is not nearly adequate, particularly in light of that summary's recognition that some Wilderness areas are overused, of the public desire for more Wilderness, of the need to protect and restore ecological integrity (including issues involving natural old-growth forests and natural processes such as disturbance regimes), of ecosystem representation, and of the fact that only 4% of the GW is Wilderness (much less than the average across the nation, Region 8 or Region 9). The basis for recommending only a tiny amount of Wilderness is not apparent. Much of the rationale seems arbitrary and capricious and seems to result from inherent biases against wilderness and wilderness values. It is not clear what social and biological factors were fully and fairly considered in establishing the rationale for such meager Wilderness recommendations. It is clear that there was no full, complete and aggressive effort to honestly and truly analyze the full potential for wilderness in the George Washington National Forest. We submit that this should be done.

The preceding comments are submitted on behalf of Wild Virginia.

Sincerely,

Ernie Reed, Board of Directors
David Hannah, Conservation Director
Wild Virginia
P. O. Box 1065
Charlottesville, VA 22902