

October 17, 2011

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

Dear Ms. Hyzer:

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

Vision

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

Land Allocations

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

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

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

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

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

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

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

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

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

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

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

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

Tiers of Management

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

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

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

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

Collaborative Process

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

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

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

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

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

Conclusion

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

Signed by:

Friends of Shenandoah Mountain per Thomas Jenkins and Lynn Cameron

Greif Packaging, LLC per Jay Phaup

International Mountain Bicycling Association per Frank Maguire and Jeremy Fancher

James River Chapter of the Ruffed Grouse Society per Wayne Thacker

Mount Pleasant Forestry, LLC per Marvin Tinsley

Shenandoah Mountain Touring per Chris Scott

Shenandoah Valley Bicycle Coalition per Kyle Lawrence

Southern Appalachian Forest Coalition per Mark Miller

The Nature Conservancy per Marek Smith

Virginia Council of Trout Unlimited per Graham Simmerman

Virginia Forest Watch per Bud Watson

Virginia Forestry Association per John Hancock

Virginia National Wild Turkey Federation per Rick Layser

Virginia Wilderness Committee per Laura Neale and Jim Murray

Additional letters of endorsement submitted by:

Back Country Horseman of Virginia per Deborah Sensabaugh

Earth Care House Church per Ronda Baer

Shenandoah Riverkeeper per Jeff Kelble

Southern Shenandoah Valley Chapter of Potomac Appalachian Trail Club per Karen Waterman

Virginia Native Plants Society per Sally Anderson

Virginia Society of Ornithology per Stephen Eccles