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January 29, 2009

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

RE: GWNF Forest Plan Revision, Wind Energy Development

Dear Planning Team,

Shenandoah Valley Network (SVN) is a non-profit conservation organization that links community groups working on land protection, land use and transportation issues in the northern Shenandoah Valley. The six counties where we work, Frederick, Shenandoah, Warren, Page, Rockingham, and Augusta, each include portions of the George Washington National Forest (GWNF).

SVN is a strong proponent of reducing our region's reliance on fossil fuels. We encourage compact growth around existing towns for less driving; we promote rail improvements over an expanded I-81 for more efficient trucking; and we support small, appropriate-scale wind energy projects on private lands through our participation in the development of county wind ordinances. Therefore it is with careful consideration that we oppose wind energy development on the George Washington National Forest at this time. We strongly encourage you to disallow wind projects in the revised Forest Plan.

The George Washington National Forest 2007 Comprehensive Evaluation Report (CER), which guides the Forest Plan revision, correctly identifies wind energy development as an emerging public issue. The CER outlines four Tentative Options for establishing guidelines for wind energy development on the Forest. Option C-4 states:

Identify that nowhere on the National Forest is generally suitable for wind energy development because of known effects on bats, particularly the Indiana bat (whose summer habitat is the entire Forest), until such time as wind energy technology exists that significantly lessens the known effects of the turbine on bats. (Draft Comprehensive Evaluation Report p. 120, 2/15/2007).

We encourage the pursuit of Option C-4 with some critical additions.

1- Broader Wildlife Impacts. The potential wildlife consequences of construction and operation of large-scale wind power projects are well-documented in United States Fish and Wildlife Service's (USFWS) November 16, 2007 letter to Ms. Wendy Tidhar recommending against wind turbines on the Shenandoah Mountain site (enclosed). The USFWS states that wind turbines on Shenandoah Mountain site would likely impact the Indiana bat, as well Virginia big-eared bat, bald eagles and migratory songbirds. Beyond turbine effects, the USFWS letter raises concerns about the consequences of clearing forest for roads to construct and access turbines. According to USFWS, these consequences may include "*direct loss of deep forest habitat; an increase in edge habitat; increased nest parasitism and predation; a decrease in abundance and diversity of area-sensitive species with a concurrent increase in habitat suitability for edge and generalist species; and interruption of travel corridors, displacement, and other behavioral effects.*" **Until technology exists that significantly lessens turbine effects on at-risk birds and bats and minimizes the habitat impacts of construction and access, wind energy development is unsuitable on the George Washington National Forest.**

2- Scenic and outdoor recreation impacts. Public lands are one of this country's greatest legacies. Good stewardship of these lands requires a strong public commitment to the land and the public land management agencies charged with their protection. In order to ensure that the public insists upon good land management, it is critical that George Washington National Forest continue to provide a wonderful outdoor experience for hikers, birders, hunters, fisherman, backpackers, and other recreationists. Current technology for wind energy development, which requires huge towers, wide roads on ridgetops, and forest clearing, is inconsistent with the recreational experience on the George Washington National Forest. **Until wind energy projects can be developed that have a minimal footprint on the landscape for scenic and recreational resources, industrial wind projects are inappropriate on the George Washington National Forest.**

3. Private land suitable for wind projects. National Forest lands can only be used for energy development when other non-Federal lands cannot. According to a letter submitted to Ms. Linda Brett by Southern Environmental Law Center (SELC) on May 13, 2008 regarding the Church Mountain wind turbine proposal (enclosed), the Forest Service Handbook implementing special use regulations, under which wind applications would be considered, requires that applicants demonstrate the need to use National Forest lands. According to SELC, "private land ridge tops account for more than half of the class 3+ wind potential" in western Virginia. **Until wind energy applicants can demonstrate that there is not suitable non-Federal land on which to develop wind energy, industrial wind projects should not be permitted on the George Washington National Forest.**

In developing your draft Forest Plan, please reconsider CER's recommendation to pursue Option 1, identifying the Forest as generally suitable for locating wind energy development outside of special areas. Instead, we encourage you to protect the multiple uses for which the Forest was created by prohibiting wind energy development. Impacts of wind generation on wildlife, scenic and recreational resources are too high to warrant the use of George Washington National Forest lands for industrial wind projects at this time.

Thank you for your consideration of these comments. Please do not hesitate to contact us if we can provide additional information.

Sincerely,

Kate G. Wofford
Director

Enclosures